



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE

P.O. Box 3000, Harrisonburg, Virginia 22801
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located at 4411 Early Road, Harrisonburg, VA
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Molly Joseph Ward.
Secretary of Natural Resources

David K. Paylor
Director

Amy Thatcher Owens
Regional Director

September 8, 2017

By Email (jason.e.williams@dominionenergy.com)

Mr. Jason E. Williams
Manager, Environmental
Dominion Energy Services, Inc.
5000 Dominion Boulevard
Glen Allen, Virginia 23060

Re: Notice of Planned Change – North Ash Pond Interim Stormwater Management Plan
Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004138
Dominion – Bremo Power Station

Dear Mr. Williams:

We are in receipt of the Notice of Planned Change for the Dominion – Bremo Power Station received under cover letter dated August 31, 2017, regarding stormwater management during the period from now until the final closure strategy is determined for the North Ash Pond. The Virginia Department of Environmental Quality has reviewed Dominion's submittal and does not consider the interim stormwater management plan to conflict with the facility's aforementioned VPDES permit, and does not believe a modification of VPDES Permit No. VA0004138 is necessary.

This correspondence does not constitute approval of the closure plans for the facility and Dominion should consider any possible implications as it relates to future planning for solid waste management purposes.

If you have questions about this notification, please contact me at (540) 574-7892 or brandon.kiracofe@deq.virginia.gov.

Sincerely,

A handwritten signature in purple ink that reads 'Brandon D. Kiracofe'.

Brandon D. Kiracofe
Regional Water Permits & Compliance Manager

cc: Ken Roller (kenneth.roller@dominionenergy.com)
Rick Woolard (rick.woolard@dominionenergy.com)
Bev Carver, VRO
Correspondence File



Overnight Mail
Return Receipt Requested

August 31, 2017

Ms. Beverley Carver
Senior Water Permit Writer
Virginia Department of Environmental Quality
Valley Regional Office
4411 Early Road, Harrisonburg, VA 22801

RE: Dominion Energy Bremo Power Station VPDES Permit No. VA0004138:
Notice of Planned Change – North Ash Pond Interim Stormwater Management Plan

Dear Ms. Carver,

Enclosed is the *North Ash Pond Interim Stormwater Management Plan* that describes how Dominion Energy plans to manage stormwater during the period from now until the final closure strategy is determined for the North Ash Pond. Implementation of this plan will minimize the potential for fugitive dust emissions, promote more effective dewatering and reduce the amount of treated water released to the James River.

Dominion is submitting this revised Notice of Planned Change in accordance with Part II.J of the subject permit and requests DEQ concurrence with the *North Ash Pond Interim Stormwater Management Plan*.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact Ken Roller at (804) 273-3494 should you have any questions related to this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason E. Williams", with a long horizontal flourish extending to the left.

Jason E. Williams
Manager, Environmental

ec: Brandon Kiracofe: brandon.kiracofe@deq.virginia.gov
Beverley Carver: beverley.carver@deq.virginia.gov



NORTH ASH POND INTERIM STORMWATER MANAGEMENT PLAN

The North Ash Pond Interim Stormwater Management Plan was created for stormwater management during the relocation of the Coal Combustion Residuals (CCR) from the East Ash Pond (EAP) to the North Ash Pond (NAP) at the Bremo Power Station. This plan, shown on Figure 1 (attached), is for the interim condition between the existing conditions and the implementation of the final closure strategy for the NAP. The plan was designed with the following objectives:

- Better manage NAP water (both contact and non-contact water) during construction activities through the use of an interim temporary geosynthetic rain cover up to 20-mils in thickness placed progressively over exposed areas of CCR as grading activities are completed;
- Minimize the infiltration of rainfall and run-on water into the exposed CCR material to promote more effective dewatering activities and improve the overall stability of the CCR material;
- Minimize the potential for fugitive dust emissions from the surface of the exposed CCR material as grading activities are completed;
- Pump NAP water (both contact and non-contact water) from construction and temporary lined areas to the Centralized Source Water Treatment System (CSWTS) for treatment until all exposed CCR areas of the NAP are temporarily covered, and;
- Pump non-contact water (after all exposed CCR areas of the NAP are temporarily covered) to established permitted Outfalls 006, 008 (Outfall 003 to reopen as Outfall 008 post CCR removal in the EAP), and/or the existing stormwater management pond as appropriate.

Temporary geosynthetic rain covering of the NAP will involve the continued relocation and grading of CCR material from the EAP until the implementation of the final closure strategy for the NAP. As the grading activities are completed in the NAP, a temporary geosynthetic rain cover up to 20-mils in thickness will be progressively installed over exposed areas of CCR to meet the objectives stated above.

Water within the NAP during relocation and grading will be treated as contact water and sent to the CSWTS regardless of whether it is generated from the CCR surface, subsurface, or on top of the temporary geosynthetic rain cover.

After all areas of exposed CCR within the NAP are graded and the temporary geosynthetic rain cover is completed, water collected on top of the temporary cover may be designated as non-contact water and routed to one of the established permitted outfalls, Outfall 006 or 008, and/or the stormwater management pond.

Any temporary geosynthetic rain cover is not considered to be part of a potential final cover system for the NAP and will be removed prior to implementation of the final closure strategy.

