



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

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July 6, 2017

Jason E. Williams
Manager, Generation Environmental Services
Dominion Virginia Power
Chesterfield Power Station
Transmitted via email: Jason.E.Williams@dominionenergy.com

Re: Notice of Planned Change – Discharge of Construction Stormwater through Outfalls 401 and 004
VPDES Permit VA0004146 – Dominion Chesterfield Power Station

Dear Mr. Williams:

The DEQ received your Notice of Planned Change letter dated June 26, 2017, regarding the proposed discharge of construction stormwater comingled with Metals Cleaning Waste Treatment Basin (MCWTB) wastewater through Outfall 401 to the Lower Ash Pond and subsequently through Outfall 004. It is understood that approximately 55,000 - 60,000 gallons of construction stormwater was transferred to the MCWTB by a construction contractor before the pumps were shut down and that corrective actions have been put into place to prevent future unauthorized transfers.

We have no objection to the proposed discharge of the comingled wastewater to the Lower Ash Pond through Outfall 401 and subsequently through Outfall 004. It is understood that the MCWTB is typically discharged to the Lower Ash Pond when the volume of the MCTWB reaches 17,250,000 gallons, at which point the 55,000 - 60,000 gallons of construction stormwater would comprise approximately 0.32 – 0.35% of the total volume. Given the small percentage of total volume comprised by the construction stormwater and the typical nature of such water, the discharge of the comingled wastewater from the MCWTB to the Lower Ash Pond is not expected to alter the characteristics of the effluent at Outfall 004.

Nothing in this letter relieves Dominion from the responsibility to comply with requirements set forth in VPDES Permit No. VA0004146 or from adhering to the Virginia Water Quality Standards (9VAC25-260).

Sincerely,



Kyle Ivar Winter, P.E.
Deputy Regional Director

cc: Heather Deihls, DEQ-PRO
Azra Bilalagic, DEQ-PRO
Kenneth Roller, Dominion



BY U.S. MAIL
RETURN RECEIPT REQUESTED

June 26, 2017

RECEIVED PRO
JUN 26 2017

Mr. Joseph B. Bryan
VPDES Water Permit Writer
Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, Virginia 23060

RE: Chesterfield Power Station VPDES Permit No. VA0004146: Transfer of Construction Stormwater to Metals Cleaning Waste Treatment Basin and Related Notice of Planned Change

Dear Mr. Bryan:

This letter is to provide information concerning the inadvertent transfer of construction stormwater to the Metals Cleaning Waste Treatment Basin (MCWTB) at the Chesterfield Power Station and notice of our plan to discharge the combined wastewater through Outfall 401 and ultimately Outfall 004.

On Wednesday, June 21, 2017 at approximately 16:15 hours, Chesterfield Integrated Ash Project (CHIAP) personnel observed a slight change in the water level in the station's MCWTB. Upon further investigation it was determined that the Low Volume Wastewater Treatment System (LVWWTs) construction contractor, RECON, was pumping construction stormwater from the equalization (EQ) basin to the MCWTB. RECON was notified that this transfer was not appropriate and the pumps were immediately shutdown.

Through subsequent discussion with RECON personnel it was determined that the transfer of water to the metals pond began around 13:30 hours on June 21 resulting in a transfer period of approximately three (3) hours. Given this amount of time and the pumping rates for the transfer pumps, it is estimated that approximately 55,000 – 60,000 gallons of construction stormwater were transferred to the MCWTB.

It has also been determined that the individuals responsible for the placement and operation of the stormwater transfer equipment lacked an adequate understanding of the construction Erosion and Sediment Control and Stormwater Pollution Prevention Plans. Consequently, as a corrective action, all RECON on-site personnel will be retrained on these plans. In addition, RECON has implemented a policy that every time a pump is set up in a new location the site Environmental Compliance Coordinator or Construction Manager must observe and approve it before it can be operated.

As stated above, approximately 55,000 – 60,000 gallons of construction stormwater were transferred to the MCWTB, which is currently about one quarter full. When full the MCWTB holds approximately 23 million gallons of water, so the current volume of water in the pond is estimated to be 5,750,000 gallons, of which approximately 1% is construction stormwater.

The station typically discharges the Metals Pond to the lower ash pond (LAP) through Outfall 401 when the MCWTB is about three quarters full (i.e. contains ~17,250,000 gallons). Assuming a Metals Pond volume of 17,250,000 gallons, the next discharge to the LAP from the MCWTB would contain about 0.3% construction stormwater. Given the relatively benign nature of the construction stormwater and the small percentage of the MCWTB that will consist of this water, there should be no perceptible impact to the characteristics of Outfall 401 or to the final LAP discharge Outfall 004. Consequently, we are seeking DEQ concurrence to move forward with discharging this water through Outfalls 401 and 004 under the existing permit.

Please contact Ken Roller at (804) 273-3494 or kenneth.roller@dominionenergy.com should you have any questions about this information.

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 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.

Sincerely



Jason E. Williams
Manager, Generation Environmental Services