

Dominion Energy Services, Inc.  
600 East Canal Street, Richmond, VA 23219  
DominionEnergy.com



James K. Beazley  
Senior Policy Director  
Direct: (804) 814-5448  
james.k.beazley@dominionenergy.com

**VIA ELECTRONIC SUBMITTAL**

October 1, 2024

Laura L. Wilborn  
Information Processing Specialist  
Division of Legislative Automated Systems  
Pocahontas Building, Suite W528  
900 East Main Street  
Richmond, Virginia 23219

**Virginia Electric and Power Company's October 1, 2024 CCR Biennial Progress Report**

Dear Ms. Wilborn:

Pursuant to Va. Code § 10.1-1402.03 (G.1), Enactment Clause 1, Section 1(G) of Chapters 650 and 651 of the 2019 Acts of Assembly, Dominion Energy Virginia is required to submit a biennial report related to closure of certain CCR Units “to the Governor, the Secretary of Natural and Historic Resources, the Chairman of the Senate Committee on Agriculture, Conservation and Natural Resources, the Chairman of the House Committee on Agriculture, Chesapeake and Natural Resources, the Chairman of the Senate Committee on Commerce and Labor, the Chairman of the House Committee on Labor and Commerce, and the [DEQ] Director” and “post each such report on a publicly accessible website.”

The report is attached here for electronic submittal to the Division of Legislative Automated Systems.

Sincerely yours,

A handwritten signature in black ink that reads "James K. Beazley".

James K. Beazley  
Senior Policy Director

Enclosure

# Biennial Progress Report Coal Combustion Residuals Unit Closures

Prepared for:

Dominion Energy Virginia  
600 E. Canal Street  
Richmond, VA 23219



Prepared by:

## **AECOM**

AECOM  
4840 Cox Road  
Glen Allen, VA 23060

[aecom.com](http://aecom.com)

September 2024

## Executive Summary

In accordance with Virginia Code § 10.1-1402.03(G)(1), this Biennial Progress Report documents Dominion Energy Virginia's (Dominion Energy) progress to date closing the Coal Combustion Residuals (CCR) units subject to the 2019 legislation (SB 1355). This report documents the closure plan, closure progress to date, accounting of CCR disposal and beneficial use amounts, description of transportation planning, and a discussion of groundwater and surface water monitoring results, for each applicable CCR unit at Dominion Energy's Chesterfield Power Station, Bremo Power Station, Possum Point Power Station, and Chesapeake Energy Center. The CCR unit closure progress to date is summarized below with details provided for each station in the following sections of this report.

### Chesterfield Power Station

- The closure plan includes excavation and removal of CCR from the Upper Ash Pond (11.3 million cubic yards (Mcy)) and the Lower Ash Pond (3.6 Mcy), disposal of approximately 8.1 Mcy in the existing on-site CCR landfill and transporting an estimated 6.8 Mcy off-site by rail for beneficial use.
- Design, permitting and procurement phases are substantially completed. A solid waste permit (SWP 619) for the pond closures and associated groundwater and surface water monitoring is in process with Virginia DEQ ("DEQ").
- Significant infrastructure construction has been completed, including the ongoing sequential build-out of the existing on-site CCR landfill, construction and operation of a water treatment system, rail loading facility and associated track upgrades, road upgrades, truck wash system, water line extension, and additional infrastructure improvements to support the project.
- The CCR beneficiation contract was rebid in late 2022, and a new contract was awarded in early 2024 to transport CCR off-site by rail for beneficial use.
- Upper Ash Pond – As of June 30, 2024, approximately 123,812 cy of CCR has been excavated and transported to the on-site rail loading facility for off-site beneficial use, and 887,917 cy of CCR has been excavated and transported to the on-site CCR landfill for disposal.
- Lower Ash Pond – As of June 30, 2024, approximately 757,781 cy of CCR has been excavated and transported to the on-site CCR landfill for disposal.

### Bremo Power Station

- The closure plan includes excavation and removal of approximately 6.2 Mcy of CCR from the North Ash Pond for placement in a new on-site CCR landfill to be constructed adjacent to the North Ash Pond.
- Received Special Use Permit from Fluvanna County for new landfill.
- Final design and permitting phases are in process. The project has received a VPDES permit renewal, Clean Water Act Section 404/401 permits for impacts to wetlands and

surface waters, and a conditional Part A Solid Waste Permit (SWP 627) for the new CCR landfill. The Part B SWP for construction of the new CCR landfill is under review by DEQ with an expected approval by early 2025.

- Construction of a water treatment system has been completed, and commissioning of the system is underway.

#### **Possum Point Power Station**

- The closure plan includes excavation and removal of approximately 4 Mcy of CCR from Pond D for placement in a new on-site CCR landfill to be constructed adjacent to Pond D.
- Received zoning determination from Prince William County for new landfill.
- Design and permitting phases are in process. The project has received a State Programmatic General Permit (SPGP) from DEQ for wetland and surface water impacts and a conditional Part A Solid Waste Permit (SWP 628) for the new CCR landfill. A VPDES permit renewal application was submitted in 2024 and is under review by DEQ, and the Part B SWP application is being finalized for submittal to DEQ in late 2024.
- Construction of a water treatment system is underway with expected completion and commissioning in 2025.

#### **Chesapeake Energy Center**

- The closure plan includes excavation and removal of approximately 2.2 Mcy of CCR from the site, including the landfill, bottom ash pond, and historical pond, for off-site transportation by rail (or barge) and truck for disposal and/or beneficial use.
- A Conditional Use Permit (CUP) for closure of the landfill, bottom ash pond, and historical pond was issued by the City of Chesapeake in December 2022.
- Design and permitting activities are underway with applications for a SWP modification (closure) and VPDES permit renewal expected to be submitted to DEQ in 2024.

**Summary of CCR quantities for closure activities as of June 30, 2024 (cubic yards).**

Station	CCR Unit or Area	CCR Quantity per Unit	Beneficial Use Expected	Beneficial Use Actual	Landfill Expected	Landfill Actual
<b>Chesterfield Power Station</b>	Upper Ash Pond	11,300,00	~6,800,000	123,812	~4,500,000	887,917
	Lower Ash Pond	3,600,000			3,600,000	757,781
<b>Bremo Power Station</b>	North Ash Pond	6,200,000	0		6,200,000	
<b>Possum Point Power Station</b>	Pond D	4,000,000	0		4,000,000	
<b>Chesapeake Energy Center</b>	Landfill, Bottom Ash Pond, Historical Pond	2,200,000	TBD		~2,200,000	
<b>Total</b>		<b>27,300,000</b>	<b>~6,800,000 (minimum)</b>	<b>123,812</b>	<b>~20,500,000</b>	<b>1,645,698</b>

## Table of Contents

<b>Acronyms</b> .....	<b>1-5</b>
<b>1. Introduction</b> .....	<b>1-6</b>
<b>2. Chesterfield Power Station</b> .....	<b>2-1</b>
2.1 Background.....	2-1
2.2 Closure Plans.....	2-1
2.3 Closure Progress to Date .....	2-1
2.4 Accounting of CCR Beneficially Used .....	2-2
2.5 Accounting of CCR Landfilled.....	2-2
2.6 Transportation Options and Plans .....	2-2
2.7 Groundwater and Surface Water Monitoring .....	2-3
<b>3. Bremo Power Station</b> .....	<b>3-1</b>
3.1 Background.....	3-1
3.2 Closure Plan .....	3-1
3.3 Closure Progress to Date .....	3-1
3.4 Accounting of CCR Beneficially Used .....	3-2
3.5 Accounting of CCR Landfilled.....	3-2
3.6 Transportation Options and Plans .....	3-2
3.7 Groundwater and Surface Water Monitoring .....	3-2
<b>4. Possum Point Power Station</b> .....	<b>4-1</b>
4.1 Background.....	4-1
4.2 Closure Plan .....	4-1
4.3 Closure Progress to Date .....	4-1
4.4 Accounting of CCR Beneficially Used .....	4-2
4.5 Accounting of CCR Landfilled.....	4-2
4.6 Transportation Options and Plans .....	4-2
4.7 Groundwater and Surface Water Monitoring .....	4-2
<b>5. Chesapeake Energy Center</b> .....	<b>5-1</b>
5.1 Background.....	5-1
5.2 Closure Plan .....	5-1
5.3 Closure Progress to Date .....	5-1
5.4 Accounting of CCR Beneficially Used .....	5-2
5.5 Accounting of CCR Landfilled.....	5-2
5.6 Transportation Options and Plans .....	5-2
5.7 Groundwater and Surface Water Monitoring .....	5-2

## Acronyms

ACM	Assessment of Corrective Measures
AECOM	AECOM Technical Services, Inc.
CCR	coal combustion residuals
CFR	Code of Federal Regulations
CPS	Chesterfield Power Station
CUP	Conditional Use Permit
cy	cubic yard
DEQ	(Virginia) Department of Environmental Quality
GPS	Groundwater protection standard
LAP	lower ash pond
Mcy	million cubic yards
MOU	Memorandum of Understanding
PM	particulate matter
RFP	request for proposal
SB	Senate Bill
SWP	Solid Waste Permit
UAP	upper ash pond
VA	Virginia
VPDES	Virginia Pollutant Discharge Elimination System
VSWMR	Virginia Solid Waste Management Regulations
VWP	Virginia Water Protection (Permit)

## 1. Introduction

This Biennial Progress Report documents Dominion Energy's CCR Unit Closure progress in accordance with Virginia Code § 10.1-1402.03 (SB 1355). Subsection G of the law requires submission of the initial biennial report by October 1, 2022, and no less frequently than every two years thereafter until closure of all CCR units is complete. The report must include:

- Description of the closure plan for all CCR units.
- Closure progress to date.
- Detailed accounting of amount of CCR by unit and in total that have been and are expected to be beneficially used.
- Detailed accounting of amount of CCR by unit and in total that have been and are expected to be landfilled.
- Detailed accounting of the utilization of transportation options and a Transportation Plan.
- Discussion of groundwater and surface water monitoring results and measures taken to address such results as closure is being completed.

The following sections of this report provide the required information for each station.



## 2. Chesterfield Power Station

### 2.1 Background

Two on-site CCR surface impoundments - Lower Ash Pond (LAP) and Upper Ash Pond (UAP) - at the Chesterfield Power Station (CPS) are subject to the requirements of SB 1355 and the federal CCR Rule. CPS ceased coal-fired generation in 2023. The 101-acre LAP was constructed in 1964 and the 112-acre UAP in 1983. Both ponds are unlined. The UAP contains approximately 11.3 million cubic yards (Mcy) of CCR, and the LAP contains approximately 3.6 Mcy.

### 2.2 Closure Plan

Closure by removal of the UAP and LAP will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR. A Solid Waste Permit for the UAP and LAP closures (SWP 619) is pending before DEQ and will cover all details of the final closure and restoration, as well as groundwater and surface water monitoring.

The Closure Plan includes:

- Excavation of all CCR from the UAP and LAP for landfill disposal as well as any associated on-site screening, drying, and handling to meet applicable criteria for beneficial use.
- Transportation of approximately 8.1 Mcy to the on-site CCR landfill for disposal.
- Transportation of approximately 6.8 Mcy to the on-site rail loading facility and subsequent off-site transportation by rail for beneficial use.
- Closure and restoration of the UAP and LAP.
- Long term groundwater and surface water monitoring, as required.

### 2.4 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Build-out and operation of Phase 1 and Phase 2, and the ongoing construction of Phase 3 of the existing on-site CCR landfill. Phase 4 will be constructed after completion of Phase 3.
- Construction and operation of a water treatment system.
- Construction and operation of a rail loading facility and associated rail infrastructure.
- Construction and operation of a truck wash system, water lines, dewatering systems, roads, and material handling systems to support project operations.
- Rebidding the beneficial use contract in late 2022 and awarding a new contract in early 2024 to transport CCR offsite by rail for beneficial use at two offsite locations: a cement kiln in Holly Hill, SC and a proposed processing facility in Skippers, VA. Transportation to the Holly Hill facility was initiated in 2024 and the Skippers facility is in design and permitting to process a portion of the CCR into a cement replacement product.

- As of June 30, 2024, excavation of approximately 1,011,729 cy of CCR from the UAP, and approximately 757,781 cy from the LAP.
- Transportation of excavated CCR to the on-site CCR landfill and on-site rail loadout facility.
- Semi-annual groundwater monitoring and corrective action evaluations.

## 2.5 Accounting of CCR Beneficially Used

Approximately 123,812 cy transported to the rail loading facility for subsequent off-site transportation by rail for beneficial use through June 30, 2024.

## 2.6 Accounting of CCR Landfilled

Approximately 1,645,698 cy transported to the on-site landfill for disposal through June 30, 2024.

## 2.7 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in two ash ponds at Chesterfield Power Station within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR off-site. Dominion Energy has worked closely with Chesterfield County to develop a Transportation Plan to avoid, minimize, and mitigate traffic impacts from CCR removal activities.

In developing the Transportation Plan, and as outlined in the agreed upon Memorandum of Understanding (MOU) with Chesterfield County that addresses transportation and public access impacts, Dominion Energy and the County focused their evaluation on safety, environmental protection, local road use and traffic needs, noise control, dust mitigation, and preserving access to the important historic and recreational areas near the Chesterfield Power Station. Under the Transportation Plan, Dominion Energy will:

- Make public roadway improvements at the beginning of the project.
- Ensure roadways are maintained to Virginia Department of Transportation standards for the duration of the trucking operations.
- Follow all relevant federal, state, and local regulations on noise levels.
- Employ accepted practices to mitigate and control dust.

The Transportation Plan lays out planned trucking routes and identifies impacted roads and intersections and is available at <https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/chesterfield-power-station-coal-ash-project>.

As part of the Transportation Plan and pursuant to the MOU with Dominion Energy, Chesterfield County plans to develop new recreational facility improvements to provide additional access to Henricus Historical Park and other local recreational resources. The County's preliminary recreation improvement plans include new access roads, new roadway and pedestrian bridges, a parking lot, a walking path, and a new boat ramp.

The MOU and Transportation Plan were both finalized in 2020. Dominion Energy has implemented community outreach and engagement following the finalization of these documents and will continue such outreach throughout the project.

## 2.8 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95) and the CPS Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website:

<https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for the UAP and LAP identified exceedances of applicable Groundwater Protection Standards (GPS) for certain constituents, generally consistent with previous results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has developed an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures.

The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate the natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR.

The pending closure permit (SWP 619) for the UAP and LAP will include updated groundwater monitoring requirements and additional requirements for surface water monitoring.

## 3. Brema Power Station

### 3.1 Background

One on-site CCR surface impoundment (North Ash Pond, or NAP) at the Brema Power Station (Brema) is subject to the requirements of SB 1355 and the federal CCR Rule. The NAP was constructed as an unlined pond in 1983. Brema ceased coal-fired generation in 2014, and all generation was retired in 2018. CCR from the former West and East Ash Ponds was subsequently excavated and consolidated in the NAP, and a temporary geomembrane rain cover was installed in 2019 to prevent stormwater contact. The NAP contains an estimated 6.2 Mcy of CCR.

### 3.2 Closure Plan

Closure by removal of the NAP will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR. A new CCR landfill is being permitted with DEQ on adjacent Dominion Energy-owned property to receive the CCR removed from the NAP.

The Closure Plan includes:

- Construction of a new on-site CCR landfill located immediately east of the NAP.
- Excavation and onsite transportation of approximately 6.2 Mcy of CCR and placement in the new landfill for disposal.
- Closure and restoration of the NAP.
- Long term groundwater and surface water monitoring, as required.

### 3.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Received a Special Use Permit from Fluvanna County for new CCR landfill.
- For the new CCR landfill, received conditional Part A Solid Waste Permit (SWP 627) and Virginia Water Protection (VWP) Permit for wetland and stream impacts from DEQ in 2023, and a Clean Water Act Section 404 permit for wetland and stream impacts from the US Army Corps of Engineers in 2024.
- The SWP 627 Part B application was submitted for the new CCR landfill in 2023 and is under final review by DEQ with expected issuance by early 2025.
- Construction of a water treatment system has been completed, and the system is in final commissioning.
- Semi-annual groundwater monitoring, quarterly surface water monitoring, and corrective action evaluations.

### 3.4 Accounting of CCR Beneficially Used

Dominion Energy is planning to construct a landfill on Company-owned property adjacent to the NAP. The new CCR landfill will be designed and constructed to receive all CCR removed from the NAP. Therefore, none of the CCR in the NAP is planned to be beneficially used.

### 3.5 Accounting of CCR Landfilled

CCR closure construction has not been initiated pending receipt of all permits and completion of procurement activities.

### 3.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in the NAP within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR off-site as part of closure of the CCR units. All CCR transportation from the NAP to the new landfill is planned to occur within Company property on internal haul roads, and no off-site transportation of CCR is anticipated.

Nonetheless, Dominion Energy intends to work closely with Fluvanna County to avoid, minimize, and mitigate potential traffic impacts associated with project construction, such as importing fill materials, construction equipment, and supplies.

### 3.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95) and the Bremo SWP and Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website:

<https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for the NAP (and former West and East Ash Ponds) identified exceedances of applicable Groundwater Protection Standards for certain constituents, generally consistent with previous results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has initiated an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures.

The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate the natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR and will submit a proposed Corrective Action Plan to DEQ by the end of 2024.

The Bremo SWP requires quarterly surface water monitoring as a complement to groundwater monitoring. Results of surface water monitoring in the James River to date have not shown exceedances of applicable standards for the constituents tested.

## 4. Possum Point Power Station

### 4.1 Background

One on-site surface impoundment (Pond D) at the Possum Point Power Station (Possum Point) is subject to the requirements of SB 1355 and the federal CCR Rule. Pond D was constructed as a clay-lined pond in 1988. Possum Point ceased coal-fired generation in 2003. CCR from former Ponds ABC and Pond E was subsequently excavated and consolidated in Pond D by 2019. Pond D contains an estimated 4 Mcy of CCR.

### 4.2 Closure Plan

Closure by removal of Pond D will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR. A new on-site CCR landfill is being permitted with DEQ on adjacent Dominion Energy-owned property to receive the CCR removed from Pond D.

The Closure Plan includes:

- Construction of a new on-site CCR landfill located immediately west of Pond D.
- Excavation and onsite transportation of approximately 4 Mcy of CCR and placement in the new landfill for disposal.
- Closure and restoration of Pond D.
- Long term groundwater and surface water monitoring, as required.

### 4.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Received zoning determination from Prince William County for new landfill.
- For the new CCR landfill, received an Army Corps of Engineers State Programmatic General Permit (SPGP) for wetland and surface water impacts from DEQ in 2023, and a conditional Part A Solid Waste Permit (SWP 628) for the new landfill from DEQ in 2024.
- A VPDES permit renewal application was submitted in 2024 and is under review by DEQ, and the Part B SWP 628 application is being finalized for submittal to DEQ in late 2024.
- Construction of a water treatment system is underway with expected completion and commissioning in 2025.
- Active coordination with Prince William County and local community.
- Semi-annual groundwater monitoring, quarterly surface water monitoring, and corrective action evaluations.

#### 4.4 Accounting of CCR Beneficially Used

Dominion Energy is planning to construct a landfill at this site on Company-owned property adjacent to Pond D. The new CCR landfill will be designed and constructed to receive all CCR removed from Pond D. Therefore, none of the CCR in Pond D is planned to be beneficially used.

#### 4.5 Accounting of CCR Landfilled

CCR closure construction has not been initiated pending receipt of all permits and completion of procurement activities.

#### 4.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in Pond D within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR off-site as part of closure of the CCR units. All CCR transportation from Pond D to the new landfill is planned to occur within Company property, and no off-site transportation of CCR is anticipated.

Nonetheless, Dominion Energy intends to work closely with Prince William County and the local community to avoid, minimize, and mitigate potential traffic impacts associated with project construction, such as importing fill materials, construction equipment, and supplies.

#### 4.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95) and the Possum Point SWP and Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website:

<https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for Pond D (and former Ponds ABC and E) identified exceedances of applicable Groundwater Protection Standards (GPS) for certain constituents, generally consistent with previous results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has conducted an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures. The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate the natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR.

The Possum Point SWP requires quarterly surface water monitoring as a complement to groundwater monitoring. Results of surface water monitoring in Quantico Creek and the Potomac River to date have not shown exceedances of applicable standards for the constituents tested.



## 5. Chesapeake Energy Center

### 5.1 Background

Chesapeake Energy Center includes a landfill, a CCR surface impoundment (Bottom Ash Pond), and an underlying historical pond. These areas are subject to closure under SB 1355, the VSWMR, and/or the CCR Rule. The current configuration of the CCR areas was developed in approximately 1985 when the landfill and adjacent Bottom Ash Pond were constructed on top of the historical pond area. CCR disposal ceased in 2015 following shutdown of the coal-fired units. The CCR areas collectively cover approximately 40 acres and contain an estimated 2.2 Mcy of CCR (approximately 1.2 Mcy in the landfill; 50,000 cy in the bottom ash pond; and 950,000 cy in the historical pond).

### 5.2 Closure Plan

Closure by removal of the CCR areas will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR.

The Closure Plan includes:

- Excavation and removal of 2.2 Mcy of CCR from the landfill, bottom ash pond, and historical pond.
- Removal of the Bottom Ash Pond (BAP) by 2027 to comply with federal CCR rule requirements. Dominion Energy currently plans to transport the CCR from the BAP off-site for beneficial use.
- Off-site transportation of all remaining CCR by rail (or barge) and truck for disposal and/or beneficial use.
- Closure and restoration of the CCR areas.
- Long term groundwater monitoring and surface water monitoring, as required.

### 5.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Site investigation work and preliminary closure design have been completed.
- Conditional Use Permit (CUP) issued by the City of Chesapeake in December 2022, with requirements to be incorporated into the Transportation Plan and overall closure project planning.
- Design and permitting tasks are underway for relocation of three transmission towers to facilitate future CCR removal.
- Applications for modification of SWP 440 (Closure) and VPDES permit renewal are in process and are expected to be submitted to DEQ in 2024.
- Semi-annual groundwater monitoring, semi-annual surface water monitoring, and corrective action evaluations.

## 5.4 Accounting of CCR Beneficially Used

CCR closure construction, including any future CCR beneficiation, has not been initiated pending receipt of all permits and completion of procurement activities.

## 5.5 Accounting of CCR Landfilled

CCR closure construction has not been initiated pending receipt of all permits and completion of procurement activities.

## 5.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in the CCR areas at the Chesapeake Energy Center within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR offsite as part of closure of the CCR areas.

Dominion Energy has worked closely with the City of Chesapeake to address potential impacts from off-site trucking. The CUP issued by the City of Chesapeake includes significant parameters to be incorporated into the Transportation Plan, including a requirement that rail (or barge) be the primary means (at least 51%) of CCR transportation off-site, limits on truck traffic, sealed trucks, proposed haul routes, and road repairs. Dominion Energy will continue working with the City of Chesapeake to develop the Transportation Plan in accordance with the CUP and the proposed transportation methods for the final selected off-site disposal or beneficial use options.

## 5.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95) and the Chesapeake Energy Center SWP and Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website: <https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for the Chesapeake CCR areas identified exceedances of Groundwater Protection Standards (GPS) for certain constituents, generally consistent with previous results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has initiated an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures. The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate the natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR.

The Chesapeake Energy Center SWP requires semi-annual surface water monitoring as a complement to groundwater monitoring. Results of surface water monitoring in Deep Creek and the Southern Branch Elizabeth River to date have not shown exceedances of applicable standards for the constituents tested.