



Christopher E. Martino
County Executive

COUNTY OF PRINCE WILLIAM
OFFICE OF EXECUTIVE MANAGEMENT
1 County Complex Court, Prince William, Virginia 22192-9201
(703) 792-6600 Metro 631-1703 FAX: (703) 792-7484

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March 9, 2017

Richard Doucette
Land Protection Manager
Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

Via Hand Delivery and E-mail to PossumPointPowerStationWastePermit@deq.virginia.gov

**RE: Draft Solid Waste Facility Permit 617 Dominion Possum Point Power Station –
Comments of the Prince William Board of County Supervisors**

Dear Mr. Doucette,

This letter is written on behalf of the Prince William Board of County Supervisors (Board) in order to provide the Board's comments on the Draft Solid Waste Facility Permit 617 Dominion Possum Point Power Station (Draft Permit). At the Board's direction, County staff and the Board's consultant have thoroughly and carefully reviewed the Draft Permit. Based on this review, the Board remains concerned about the protection of County citizens and the natural environment as provided in the Draft Permit's proposal to allow the Coal Combustion Residue (CCR) to be capped in place in Pond D. The Board requests that further analysis and conditions be included in the Draft Permit as follows.

1. A complete independent third-party assessment of the alternatives to cap in place, including recycling or removing the CCR, needs to be completed prior to proceeding with the Draft Permit and the cap in place option.
 - a. This assessment shall consider a detailed analysis of recycling the material on-site or off-site. All benefits and impacts should be considered in this analysis, including short-term and long-term impacts on the environment, length of time to recycle, truck traffic, and costs.
 - b. The assessment shall consider a detailed analysis of the option to haul all CRR off-site to a modern composite lined landfill which meets all current

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The assessment shall include an analysis of short-term and long-term risks, including short-term and long-term impacts on the environment, length of time to remove CCR, and costs. The option to rail or barge material off site shall take precedent over removal by truck.

- c. These alternatives shall be compared to the short-term and long-term risks of cap in place. The assessment shall be submitted to VDEQ by July 1, 2017 and be available for public comment and review for at least 45 days. This assessment should be considered and evaluated by VDEQ, prior to issuing a final solid waste permit, and the time for the Draft Permit review should be extended to consider this alternatives analysis. **VDEQ should not take any final action on the Draft Permit unless and until this alternatives assessment is complete, made available for public review and comment for at least 45 days, and VDEQ carefully reviews and considers the assessment and any public comments.** VDEQ should ask Dominion for an extension of the Draft Permit review period to complete this assessment, review it and made it publicly available, and consider any public comments. The Board will be writing separately to Dominion requesting that it agree to extend the review period to complete this process, and to agree to any other extension that VDEQ requests as it considers the Draft Permit.
2. The Groundwater Monitoring Plan sampling frequency and time frame should be accelerated to expedite the establishment of the new statistical background concentrations, and the sampling of the new wells to better assess the groundwater conditions. The proposed new background wells have been sampled since September 2016 as part of the Virginia Pollutant Discharge Elimination System (VPDES) Permit. Using monthly values (every other biweekly), eight (8) independent results will be available by April 2017 in order to perform the required statistical analysis to assess the new down-gradient wells. A condition should be added to the Draft Permit which requires Dominion to develop Groundwater Protection Standards (GPS) no later than April 2017, and conduct monthly sampling to determine if GPS standards are exceeded no later than October 2017.
3. A condition should be added stating that the installation of the final cap system shall not be initiated until such time as a completed statistically-valid groundwater analysis, and any required corrective action assessments and plans, have been completed and approved by VDEQ.
4. The sampling frequency should be increased from semi-annual to quarterly in order to more quickly detect any potential releases.

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5. The Groundwater Monitoring Plan calls for a proposed additional investigation of Stratum E west of Pond D. The absence of Stratum E (the aquiclude) could result in hydraulic interconnection with the underlying Stratum F aquifer. Elevated concentrations have already been observed in wells ED-22RA and T-1615S which are located in Stratum F. This could necessitate installation of Stratum F wells between Pond D and Pond E to detect any impacts on Stratum F originating from Pond D. Wells 1610 and 1611 are in Stratum D. Paired Stratum F wells should be installed at these locations.
6. The Groundwater Monitoring Plan for demonstration of clean closure for Ponds A, B, C, and E should be revised to require results below GPS for at least three years before terminating post-closure monitoring.
7. The EPA regulations require demonstration of location requirements for existing CCR surface impoundments for placement above the uppermost aquifer, wetlands, fault areas, seismic impact zones, and unstable areas (40 CFR § 257.60-64). These documents for Pond D should be submitted, reviewed, and incorporated into the Draft Permit.
8. The details of the Surface Water Sampling Plan are not included in the Draft Permit. This plan should be submitted immediately, and be subject to public comment and review prior to approval of the Draft Permit. Surface water monitoring should be initiated as soon as possible.
9. Sediment samples should be taken and analyzed in the unnamed tributary to Quantico Creek (the Beaver Pond), located on the west side of the site (adjacent to Pond E), to ensure the continued long-term release of water from Pond E has not impacted sediments in this Creek.
10. The post-closure plan for Pond D should include groundwater and surface water detection monitoring as long as CCR is left in place at Possum Point. The regulation to cease post-closure monitoring after the 30-year period should not be an option in this case due to the close proximity of Pond D to Quantico Creek.
11. The Financial Assurance requirements should be increased to include a catastrophic failure of the Pond D impoundment, including clean up and removal of all the CCR resulting from the failure and all remaining CCR on site.
12. The Draft Permit should include a condition to develop and provide public information to nearby residents, through regular quarterly (or more frequent) meetings and newsletters, and whenever a significant event occurs in the closure

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process. Dominion should provide a central point of contact for all community questions and concerns, and that individual should be readily available to the public. All monitoring results and reports should be made available promptly to the public via the VDEQ and Dominion websites. In addition, Dominion should be required to regularly update County staff on Dominion's closure activities.

Please do not hesitate to contact the County if you have any questions or would like to discuss this matter. The County's point of contact is Tom Smith, Solid Waste Division Chief, who can be contacted via phone at (703) 792-6252 or email at tsmith@pwcgov.org.

Regards,



Christopher E. Martino
County Executive

cc: Board of County Supervisors
Chiefs of Staff, Board of County Supervisors
Michelle Robl, County Attorney
Tom Bruun, Director of Public Works
Tom Smith, Solid Waste Division Chief