

US EPA ARCHIVE DOCUMENT

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March 23, 2009

Overnight Delivery

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202 2733

Dear Mr. Kinch:

This letter responds to letters from Barry N. Breen, dated March 9, 2009, the earliest of which was received on March 11, 2009, to the Plant Managers at Brema Power Station, Chesapeake Energy Center and Chesterfield Power Station requesting information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") regarding surface impoundments that receive liquid borne residuals or by-products from the combustion of coal. This letter also responds to Mr. Breen's letter (dated March 9 and received March 11, 2009) to the chief executive officer for Virginia Electric & Power Company ("Dominion Virginia Power") requesting a list of additional facilities that have surface impoundments subject to the request, but which did not receive an information request. This response includes information for other Dominion Virginia Power stations as well as other stations owned by subsidiaries of Dominion Virginia Power's parent company, Dominion Resources, Inc.

Enclosed with this letter are responses to the information requests directed to Brema Power Station, Chesapeake Energy Center and Chesterfield Power Station. In addition to these three facilities, another facility owned by Dominion Virginia Power, the Possum Point Power Station, has surface impoundments that are subject to this request. Our response to the information request relative to this station is enclosed. Certifications signed and dated by an authorized representative of Dominion Virginia Power are included with our response.

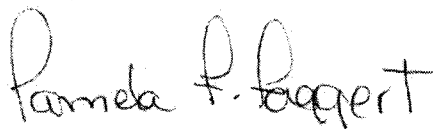
Another facility, owned by Kincaid Generation, LLC (a Dominion Resources, Inc. subsidiary) and operated by Dominion Energy Services Company (also a Dominion Resources, Inc. subsidiary), is subject to the information request. Our response to the information request relative to this station, with the appropriate certification, also is enclosed.

As we understand the EPA's information request, no other Dominion facilities or impoundments should be subject to the information request. In addition to the surface impoundments described in our response, there are a number of other types of ponds at Dominion's coal-fired power stations that may receive some limited quantities of coal combustion residuals or by-products. However, these ponds are not used for the storage or disposal of these materials. Typically such ponds are designed for, and dedicated to the treatment of wastewaters generated during the chemical cleaning of station boilers and associated equipment. These ponds also can include storm water retention ponds that are designed to handle runoff from various other locations throughout the power station, including ash handling areas associated with dry coal combustion by-product management facilities. The ponds described above are not included in our response.

The responses provided pursuant to the information request are not intended and should not be construed as an admission of liability by Dominion Resources, Inc. or its subsidiaries for the release or threatened release of hazardous substances at these facilities.

For questions concerning this response, please contact Cathy Taylor at (804) 273-2929.

Sincerely,

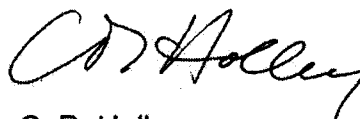
A handwritten signature in cursive script that reads "Pamela F. Faggert". The signature is written in dark ink and is positioned above the printed name.

Pamela F. Faggert

**Certification for Bremo Power Station, Chesapeake Energy Center,
Chesterfield Power Station, Possum Point Power Station, and Virginia
Electric & Power Company**

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature:



Name:

C. D. Holley

Title:

Vice President Fossil & Hydro
System Operations

Date:

March 23, 2009

Company: Virginia Electric and Power Company
Station: Bremo Power Station
Ash Facility: West Ash Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The West Ash Pond Dam is not regulated by a state or federal dam safety agency. It does not meet the criteria for a regulated dam under the Virginia Impounding Structures Regulations. The dam does not have an NID hazard rating.

2. What year was each management unit commissioned and expanded?

Response: The West Ash Pond was built in 1978 - 1979. The West Ash Pond has not been expanded.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The materials that are contained in the pond are fly ash, bottom ash, boiler slag and other. The other materials are: (1) coal mill rejects (including small amounts of pyrites); and (2) coal fines.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: There are insufficient records to know if the West Ash Pond Dam was designed and constructed under the supervision of a Professional Engineer. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The West Ash Pond Dam was last inspected by Dominion's in-house geotechnical engineer in January 2009. He has 35 years of geotechnical engineering experience and for the past 25 years has had responsibility for safety inspections of all Dominion's dams and required reporting to State and Federal regulatory agencies. No significant corrective actions were identified by the latest inspection.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: This dam is not regulated by any state or federal dam safety agency.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: This dam is not regulated by any state or federal dam safety agency. The January 2009 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of the West Ash Pond is approximately 17 acres and its capacity is approximately 290 acre-feet. As of January 2009, the estimated solids volume is 252 acre-feet. The maximum height of the dam is approximately 17 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There have been no spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility.

Response: The West Ash Pond Dam is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion personnel working at the Bremo Power Station.

Company: Virginia Electric and Power Company
Station: Bremo Power Station
Ash Facility: North Ash Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The dam does not have an NID hazard rating. It is regulated by the Virginia Department of Conservation & Recreation (DCR) Dam Safety program and has been proposed to be a Low Hazard dam in accordance with the recently revised Virginia Impounding Structure Regulations.

2. What year was each management unit commissioned and expanded?

Response: The North Ash Pond was commissioned in 1983. The North Ash Pond has not been expanded.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The materials that are contained in the pond are fly ash, bottom ash, boiler slag and other. The other materials are: (1) coal mill rejects (including small amounts of pyrites); (2) coal fines; and (3) sand/silt/sediment from dredging the James River within and adjacent to cooling water intake structures.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: The North Ash Pond Dam was designed by J.K Timmons and Schnabel Engineering, Inc., both professional engineering firms. Construction was overseen by the design engineers. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The North Ash Pond dam was last inspected by our in-house geotechnical engineer in October 2008, in accordance with our Operation and Maintenance Certificate with the Virginia DCR. He has 35 years of geotechnical engineering experience and for the

past 25 years has had responsibility for safety inspections of all Dominion's dams and required reporting to State and Federal regulatory agencies. No significant corrective actions were identified by the latest inspection.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: The Virginia Impounding Structures Regulations require inspections to be performed by the owner or their engineer and DCR officials do not perform additional safety inspections or evaluations.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: The October 2008 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of the North Ash Pond is approximately 96 acres and its capacity is approximately 4300 acre-feet. The estimated solids volume currently in the North Ash Pond is 2,169 acre-feet based on assessments made in January 2009. The maximum height of the dam is 102 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There have been no spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility.

Response: The North Ash Pond Dam is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion personnel working at the Brema Power Station.

Company: Virginia Electric and Power Company
Station: Chesapeake Energy Center
Ash Facility: Bottom Ash and Sedimentation Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The Bottom Ash and Sedimentation Pond is not regulated by a state or federal dam safety agency. It does not meet the criteria for a regulated dam under the Virginia Impounding Structures Regulations. The dikes do not have an NID hazard rating.

2. What year was each management unit commissioned and expanded?

Response: The original station ash pond was commissioned in the mid 1950's. In 1984, when the original pond was filled, a dry ash storage facility was designed and constructed above the stored ash. The Bottom Ash and Sedimentation Pond was created in 1984 at the south end of the dry ash storage facility. In late 2001 to early 2002, two internal berms were installed in the current bottom ash pond to facilitate solids settling from the bottom ash sluice line.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The materials that are contained in the pond are: fly ash, bottom ash, boiler slag, and other. The other materials are: (1) coal fines; (2) waste water from the boiler cleaning treatment/settlement pond, coal pile runoff settlement pond, and low volume waste water system; and (3) sluiced economizer ash from Unit 3.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: The Bottom Ash and Sedimentation Pond dikes were part of an original fly ash settling pond designed by Stone & Webster Engineering Corporation, a professional engineering firm. Stone & Webster oversaw construction of the facility. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or

contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The Bottom Ash and Sedimentation Pond dikes were inspected by Dominion's in-house geotechnical engineer in January 2009. He has 35 years of geotechnical engineering experience and for the past 25 years has had responsibility for safety inspections of all Dominion's dams and required reporting to State and Federal regulatory agencies. The need to remove/cut vegetation from the downstream slopes of the dikes was identified. Chesapeake Energy Center personnel are in the process of implementing a vegetation removal project. Another inspection will be conducted after the vegetation control is complete.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: This dam is not regulated by any state or federal dam safety agency.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: This dam is not regulated by any state or federal dam safety agency. The January 2009 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of the Bottom Ash and Sedimentation Pond is approximately 9.7 acres and its capacity is approximately 77 acre-feet. The estimated volume of stored material (assessed in January 2009) is approximately 25 acre-feet. The maximum height of the dikes is approximately 15 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There is no history of spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility

Response: The Bottom Ash and Sediment Pond is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion

personnel working at the Chesapeake Energy Center in conjunction with an ash management contractor, Headwaters Resources.

Company: Virginia Electric and Power Company

Station: Chesterfield Power Station

Ash Facility: Lower (Old) Ash Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The Lower (Old) Ash Pond Dam is not regulated by a state or federal dam safety agency. It does not meet the criteria for a regulated dam under the Virginia Impounding Structures Regulations. The dam does not have an NID hazard rating.

2. What year was each management unit commissioned and expanded?

Response: The Lower (Old) Ash Pond was commissioned in two stages, starting in 1964 and then raised 5 feet in 1967-68.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The materials that are contained in the pond are fly ash, bottom ash, boiler slag and other. The other materials are: (1) coal mill rejects (including small amounts of pyrites); (2) coal fines; (3) runoff from the coal pile; (4) water from the boiler cleaning waste treatment basin; and (5) water from the master sump pond.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: The Lower (Old) Ash Pond Dam was designed by Stone & Webster Engineering Corporation, a professional engineering firm. Construction of the dam was also overseen by Stone & Webster. The 1967-68 expansion was also designed and overseen by Stone & Webster. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The Lower (Old) Ash Pond Dam was last inspected by Dominion's in-house geotechnical engineer in January 2009. He has 35 years of geotechnical engineering experience and for the past 25 years has had responsibility for safety inspections of all

Dominion's dams and required reporting to State and Federal regulatory agencies. The most significant corrective action identified was the need to remove/cut vegetation from the downstream slopes of the dikes. Chesterfield Power Station personnel are in the process of implementing a vegetation removal project. Another inspection will be conducted after the vegetation removal is complete.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: This dam is not regulated by any state or federal dam safety agency.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: This dam is not regulated by any state or federal dam safety agency. The January 2009 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of the Lower (Old) Ash Pond is approximately 49 acres and its capacity is approximately 740 acre-feet. The current volume of material stored (assessed in January 2009) is 555 acre-feet. The maximum height of the dam is 19 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There was an unusual discharge event involving elevated Total Suspended Solids (TSS) at Outfall 004 (lower ash pond discharge point to the James River) on January 13, 2005. The Virginia Department of Environmental Quality ("DEQ") was notified. Corrective action was taken to address the issue and prevent recurrence as required by the DEQ.

10. Please identify all current legal owner(s) and operator(s) at the facility

Response: The Lower (Old) Ash Pond Dam is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion personnel working at the Chesterfield Power Station in conjunction with a contractor, Shoosmith Brothers, Inc.

Company: Virginia Electric and Power Company

Station: Chesterfield Power Station

Ash Facility: Upper (New) Ash Pond

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The dam does not have an NID hazard rating. It is regulated by the Virginia Department of Conservation & Recreation (DCR) Dam Safety program and has been proposed to be a Low Hazard dam in accordance with the recently revised Virginia Impounding Structure Regulations.

2. What year was each management unit commissioned and expanded?

Response: The Upper (New) Ash Pond was commissioned in 1983. The Pond Closure Plan for the Upper Ash Pond was first submitted to the DEQ in 1996. Closure of the unit began in 2002 and continues.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The materials that are contained in the pond are fly ash, bottom ash, boiler slag flue gas emission control residuals and other. The other materials are: (1) coal mill rejects (including small amounts of pyrites); (2) coal fines; and (3) dredge spoil materials (removed from facilities, areas, and systems related to operating and maintenance of the power station).

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: The Upper (New) Ash Pond Dam was designed by J.K. Timmons and Schnabel Engineering, both professional engineering firms. The construction of the dam was overseen by the design engineers. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The Upper (New) Ash Pond Dam was inspected by Dominion's in-house geotechnical engineer in September 2008, in accordance with our Operation and Maintenance Certificate with the Virginia DCR. He has 35 years of geotechnical engineering experience and for the past 25 years has had responsibility for safety inspections of all Dominion's dams and required reporting to State and Federal regulatory agencies. No significant corrective actions were identified by the latest inspection.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: The Virginia Impounding Structures Regulations require inspections to be performed by the owner of the facility or their engineer and DCR officials do not perform additional safety inspections or evaluations.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: The September 2008 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The Upper (New) Ash Pond is no longer receiving liquid borne material. The surface area of the Upper (New) Ash Pond is approximately 112 acres and the total capacity of the management unit after closure is approximately 10,240 acre feet. The volume of material currently stored in the management unit is estimated to be 6360 acre feet as of January 2009. The maximum height of the dam is 44 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There have been no spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility

Response: The Upper (New) Ash Pond is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion personnel working at the Chesterfield Power Station in conjunction with a contractor, Shoosmith Brothers, Inc.

Company: Virginia Electric and Power Company

Station: Possum Point Power Station

Ash Facility: Ash Pond 'E'

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The dam does not have an NID hazard rating. It is regulated by the Virginia Department of Conservation & Recreation (DCR) Dam Safety program and has been proposed to be a Significant Hazard dam in accordance with the recently revised Virginia Impounding Structure Regulations.

2. What year was each management unit commissioned and expanded?

Response: Ash Pond 'E' was commissioned in 1968. Ash Pond 'E' has not been expanded.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The station no longer consumes coal as a fuel source. The materials that are contained in the pond are coal fly ash, coal bottom ash, boiler slag, and other. The other materials are: (1) a small quantity of oil ash; (2) coal mill rejects (including small amounts of pyrites); and (3) coal fines.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: The Ash Pond 'E' Dam was designed by Stone & Webster Engineering Corporation, a professional engineering firm. Stone & Webster oversaw the construction of the dam as well. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The Ash Pond 'E' Dam was last inspected by Dominion's in-house geotechnical engineer in January 2009. He has 35 years of geotechnical engineering experience and for the past 25 years has had responsibility for safety inspections of all Dominion's dams and

required reporting to State and Federal regulatory agencies. No significant corrective actions were identified by the latest inspection.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: The Virginia Impounding Structures Regulations require inspections to be performed by the owner of the facility or their engineer and DCR officials do not perform additional safety inspections or evaluations.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: The January 2009 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of Ash Pond 'E' is approximately 32 acres and its capacity is approximately 600 acre-feet. The estimated solids volume currently in Ash Pond 'E' is 451 acre-feet based on assessments made in January 2009. The maximum height of the dam is 40 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There have been no spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility

Response: The Ash Pond 'E' is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion personnel working at the Possum Point Power Station.

Company: Virginia Electric and Power Company

Station: Possum Point Power Station

Ash Facility: Ash Pond 'D'

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The dam does not have an NID hazard rating. It is regulated by the Virginia Department of Conservation & Recreation (DCR) Dam Safety program and has been proposed to be a Significant Hazard dam in accordance with the recently revised Virginia Impounding Structure Regulations.

2. What year was each management unit commissioned and expanded?

Response: The Ash Pond 'D' was commissioned in 1989. Ash Pond 'D' has not been expanded.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The station no longer consumes coal as a fuel source. The materials that are contained in the pond are coal fly ash, coal bottom ash, boiler slag, and other. The other materials are: (1) solids from VPDES treatment ponds and storm water management facilities; (2) solids from old/closed VPDES treatment ponds (Ash Pond A, B and C); (3) solids from station floor drains lift stations, and sumps; (4) water treatment plant filter cake and cooling tower basin sludge; (5) soil and fines from station beautification and land restoration projects, including the coal pile area, deicing grit, abrasives, and inert cleanup debris such as surplus soil, rock, and gravel; (6) sand/silt/sediment from the Potomac River and Quantico Creek within and adjacent to cooling water intake structures, outfall structures, oil barge berths, shoreline revetments, boat ramp, transportation structures, and navigation-related channels and structures; (7) dredge material from station settling ponds; (8) solids from lift stations and sumps; (9) dredge material from the Potomac River watershed under the jurisdiction of Virginia; (10) clean Fill (soil) material; (11) coal mill rejects (including small amounts of pyrites); and (12) coal fines.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: The Ash Pond 'D' Dam was designed by professional engineers from Dominion's in-house engineering staff. Construction was overseen by these design engineers. Inspection and monitoring is performed by our in-house geotechnical engineer, who is a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The Ash Pond 'D' Dam was last inspected by Dominion's in-house geotechnical engineer in January 2009, in accordance with our Operation and Maintenance Certificate with the Virginia DCR. He has 35 years of geotechnical engineering experience and for the past 25 years has had responsibility for safety inspections of all Dominion's dams and required reporting to State and Federal regulatory agencies. No significant corrective actions were identified by the latest inspection.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: The Virginia Impounding Structures Regulations require inspections to be performed by the owner of the facility or their engineer and DCR officials do not perform additional safety inspections or evaluations.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: The January 2009 in-house inspection revealed no structural safety issues.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of Ash Pond 'D' is approximately 120 acres and its capacity is approximately 6400 acre-feet. The estimated solids volume currently in Ash Pond 'D' is 1612 acre-feet based on assessments made in January 2009. The maximum height of the dam is 140 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There have been no spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility

Response: The Ash Pond 'D' is owned by Virginia Electric & Power Company (conducting business as Dominion Generation). It is operated by Dominion personnel working at the Possum Point Power Station.

Certification for Kincaid Generation, LLC

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: *Diane Leopold*

Name: *Diane Leopold*

Title: *VP-F&H Operations*

Date: *3/24/09*

Company: Kincaid Generation, L.L.C.

Station: Kincaid Power Station

Ash Facility: Kincaid Slagfield Berm

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The Slagfield Berm does not have a NID rating.

2. What year was each management unit commissioned and expanded?

Response: Construction of the Slagfield Berm began in 1964 and was commissioned in 1967. The Slagfield Berm has not been expanded.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

Response: The materials that are contained in the unit are fly ash, bottom ash, boiler slag, and other. The other materials are: (1) waste water and water treatment solids; (2) excavation spoils; and (3) dredge spoil materials (removed from facilities, areas, and systems related to operating and maintenance of the power station).

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Response: Sargent & Lundy was the Station's Architectural and Engineering firm that designed the Station and the Slagfield Berm. It is unknown whether the construction was supervised by a Professional Engineer. Routine inspections and monitoring are performed by Station personnel and not by a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

Response: The Slagfield Berm was last inspected on January 23, 2009 by James P. Knutelski, P.E., with Hanson Professional Services, Inc. Mr. Knutelski is a Geotechnical Engineer. The inspection identified three areas in need of attention: 1) Repair three animal burrows. 2) Add rip rap along the northwest shore of Lake Sangchris; and 3) Remove trees on the berm. The animal burrows have been repaired by Station personnel. Station

personnel and Dominion in-house Engineering are in the process of implementing a rip rap addition and tree removal project.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response: This dam is not regulated by any State or Federal Dam Safety Agency.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Response: There has not been a State or Federal regulatory inspection of the Slagfield Berm.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response: The surface area of the Station's Slagfield Berm is approximately 178 acres and is managed as one unit. The total storage capacity of the Slagfield Berm is approximately 3560 acre-feet. The volume of material currently stored in the Slagfield Berm is approximately 2096 acre-feet. This estimate was calculated on March 16, 2009. The nominal berm height is 20 feet. The maximum height of the berm is estimated at 35 feet.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

Response: There have been no spills or unpermitted releases from the unit within the last ten years.

10. Please identify all current legal owner(s) and operator(s) at the facility

Response: The Kincaid Facility was purchased by Dominion in February 1998. The legal owner of Kincaid Power Station is Kincaid Generation, L.L.C. and the operator is Dominion Energy Services Company.