



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

September 26, 2019

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. E-22, Sub 562
DENC Responses to Public Staff Data Requests on Yearly Ash
Volumes

Dear Ms. Campbell:

In connection with the above-referenced docket, the Public Staff wishes to provide the Commission and the parties the attached Public Staff Late-Filed Exhibit 1. This late-filed exhibit was requested by Commissioner Brown-Bland on September 24, 2019, during the evidentiary hearing of the above-referenced matter.

By copy of this letter, I am forwarding a copy to all parties of record by electronic delivery.

Sincerely,

/s/ Nadia Luhr
Staff Attorney
nadia.luhr@psncuc.nc.gov

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Transportation
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Accounting
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Consumer Services
(919) 733-9277

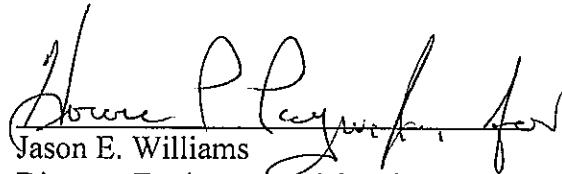
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Dominion Energy North Carolina
2019 NC Base Case – Docket No. E-22, Sub 562
Public Staff
Data Request No. 3

The following response to Question No. 1 of Public Staff Data Request No. 3, dated March 29, 2019 has been prepared under my supervision.


Jason E. Williams
Director-Environmental Services
Dominion Energy Services, Inc.

Question No. 1:

For all current and former coal generating stations, please list all locations (e.g. lay of land areas, cinder piles, ponds, impoundments, and landfills) where the Company has disposed of CCR, including both original locations and, where applicable, new or relocation sites if CCR has been moved from its original location. For each location, please provide:

- a. The physical address.
- b. The nomenclature used to identify each CCR storage area at each location.
- c. Year(s) during which each CCR storage area was in operation (receiving or storing CCR).
- d. Amount of CCR disposed (columns for cubic yards and tonnage) during each year identified in 1.c. (if available), and cumulatively.
- e. A description of the engineering features and construction details of the storage areas including, the storage volume.
- f. A site plan for each location, and, if available, an aerial photograph with key features marked.
- g. Whether the Company plans to excavate or otherwise close or take corrective action at the area.
- h. The timeframe for closure plans or other corrective action. Please also provide any draft closure or corrective action plans.
- i. If the area is being excavated or other corrective action is being taken, whether it being done to meet regulatory requirements and which regulatory requirements.
- j. If the area is being excavated and there is not a regulatory requirement or other environmental compliance reason, please provide the management reason for the excavation or other corrective action being taken.

Response:

The response for a, b, c, d, g, h, i, and j are provided in a table included in Attachment Public Staff Set 3-1b (JW). The response for “e” is provided in Attachment Public Staff Set 3-1a (JW) which includes applicable engineering, design, and construction information. The site plans requested in “f” can be found in the groundwater monitoring plans included in Attachment Public Staff Set 3-11b (JW).

Attachment Public Staff Set 3-11b (JW)

Station	Unit Name	Operating Years	Total Volume (CuYd)	Closure Method	Closure Timeframe	Regulatory Driver
Bremo	East Pond	1930s-1980s	327,323***	Removal	2019	CCR Rule/SB 1355
Bremo	North Pond	1983-2014	6,200,000****	Removal	2034	CCR Rule/SB 1355
Bremo	West Pond	1970s-2014	1,577,205****	Removal	2019	CCR Rule/SB 1355
CEC	Bottom Ash Pond	1985-2014	60,000	Removal	2034	CCR Rule/SB 1355
CEC	Historic Pond	1950s-1980s	1,150,000	Removal	2034	CCR Rule/SB 1355
CEC	Landfill	1985-2014	975,000	Removal	2034	CCR Rule/SB 1355
Chesterfield	Lower Ash Pond	1964-2017	3,600,000	Removal	2034	CCR Rule/SB 1355
Chesterfield	Reymet Rd Landfill	2017-Present	100,000	Closure in Place	TBD	CCR Rule/VSWMR
Chesterfield	Upper Ash Pond	1985-2017	11,300,000	Removal	2034	CCR Rule/SB 1355
Clover	FGD Basins	1995-Present	Deminimus*****	Removal	TBD	CCR Rule/VSWMR
Clover	Landfill	1995-Present	6,369,200	Closure in Place	TBD	CCR Rule/VSWMR
Mt. Storm	Low Volume Ponds	2016-Present	Deminimus	Removal	TBD	CCR Rule
Mt. Storm	Phase A&B Landfill	1986-Present	19,305,000	Closure in Place	TBD	CCR Rule
Possum Point	Pond D	1960s -1971; 1986-2003	4,000,000**	Removal	2034	CCR Rule/SB 1355
Possum Point	Pond E	1968-2003	1,329,463*	Removal	2019	CCR Rule/SB 1355
Possum Point	Ponds A, B, C	1955-1967	358,250*	Removal	2019	CCR Rule/SB 1355
VCHC	Landfill	2012-Present	7,435,929	Closure in Place	TBD	CCR Rule/VSWMR
Yorktown	Landfill	1985-Present	1,500,000	Closure in Place	2019	CCR Rule/VSWMR

* Ash originally disposed of in this impoundment has now been consolidated into Pond D.

** Includes the ash now removed from Ponds ABC and E and consolidated into D.

*** Ash originally disposed of in this impoundment has now been consolidated into the North Pond.

****Includes the ash now removed from the East and West Ponds and consolidated into the North Pond.

*****FGD solid are routinely removed from the FGD sludge pond and taken to the Stage III landfill for disposal. Liquids are recirculated.

Note: All volumes above are estimates based on available design information combined with survey results. Dates of operation are also estimates and based on available records and communication with station personnel.

Dominion Energy Services, Inc.
Law Department
120 Tredegar Street, Richmond, VA 23219
DominionEnergy.com



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VIA ELECTRONIC DELIVERY

July 12, 2019

Layla Cummings, Esq.
Nadia Luhr, Esq.
Public Staff
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, North Carolina 27603

Docket No. E-22, Sub 562

Dear Layla and Nadia:

Enclosed are the responses of Dominion Energy North Carolina to Public Staff's One Hundred and Fourteenth Set of Data Requests dated July 2, 2019.

If you have any questions, please do not hesitate to contact me.

Sincerely,

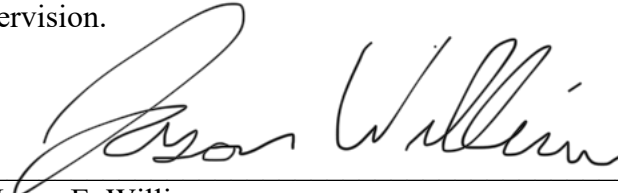
A handwritten signature in black ink, appearing to read "Horace", written over a horizontal line.

Horace P. Payne, Jr.
Assistant General Counsel

Enclosures

Dominion Energy North Carolina
2019 NC Base Case – Docket No. E-22, Sub 562
Public Staff
Data Request No. 114

The following response to Question No. 1 of Public Staff Data Request No. 114, dated July 2, 2019 has been prepared under my supervision.



Jason E. Williams
Director, Learning Development & Communications
Dominion Energy Services, Inc.

Question No. 1:

In response to DR 3-1a, b, c, d, i, and j, Dominion provided a spreadsheet titled Table Public Staff Set 3-1(b) JW. The table includes a total volume (CuYd) for each CCR storage unit. DR 3-1d specifically requested the following information:

Amount of CCR disposed (columns for cubic yards and tonnage) during each year identified in 1.c. (if available), and cumulatively.

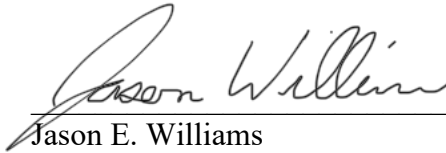
Please provide the requested information for each year of operation.

Response:

Dominion does not have records of year to year ash volumes for its CCR impoundments. Storage capacity in CCR impoundments was managed through compliance with VPDES permits and visual observation. In addition, in many cases CCR from smaller ponds was periodically dredged and placed in larger ponds or landfills on site for permanent storage. Dominion is reassessing whether year to year storage volumes are available for some or all of its CCR Landfills, and it will supplement its response to this request if responsive information is identified.

Dominion Energy North Carolina
2019 NC Base Case – Docket No. E-22, Sub 562
Public Staff
Data Request No. 114

The following *supplemental* response (dated July 19, 2019) to Question No. 1 of Public Staff Data Request No. 114, dated July 2, 2019 has been prepared under my supervision.



Jason E. Williams
Director, Learning Development & Communications
Dominion Energy Services, Inc.

Question No. 1:

In response to DR 3-1a, b, c, d, i, and j, Dominion provided a spreadsheet titled Table Public Staff Set 3-1(b) JW. The table includes a total volume (CuYd) for each CCR storage unit. DR 3-1d specifically requested the following information:

Amount of CCR disposed (columns for cubic yards and tonnage) during each year identified in 1.c. (if available), and cumulatively.

Please provide the requested information for each year of operation.

Response:

Dominion does not have records of year to year ash volumes for its CCR impoundments. Storage capacity in CCR impoundments was managed through compliance with VPDES permits and visual observation. Dominion is reassessing whether year to year storage volumes are available for some or all of its CCR Landfills, and it will supplement its response to this request if responsive information is identified.

Supplemental Response:

Please see Attachment Public Staff 114.

Attachment Public Staff Set 114 SUPP
Yorktown

<u>Year</u>	<u>Tons of Ash to Landfill</u>
2000	111,921.98
2001	110,862.44
2002	90,682.38
2003	79,239.75
2004	31,727.77
2005	126,715.09
2006	107,894.17
2007	116,828.06
2008	88,971.12
2009	105,222.23
2010	97,295.48
2011	57,136.39
2012	15,113.71
2013	35,264.36
2014	44,282.74
2015	11,939.23
2016	19,368.16
2017	5,266.27
2018	11,222.89
2019	318.89

<u>Year</u>	<u>Tons of Ash to Landfill</u>
2011	0
2012	749,327.42
2013	1,446,014.25
2014	1,322,150.01
2015	1,138,821.48
2016	1,222,177.30
2017	1,111,689.20
2018	1,110,331.00

Attachment Public Staff Set 114 SUPP
Mt. Storm

<u>Year</u>	<u>Tons of Ash to Landfill</u>
2004	964,723
2005	924,100
2006	971,340
2007	792,253
2008	790,427
2009	763,696
2010	830,082
2011	744,792
2012	662,308
2013	688,110
2014	745,595
2015	775,091
2016	960,624
2017	466,966
2018	410,361
2019	145,635

Attachment Public Staff Set 114 SUPP
Chesterfield

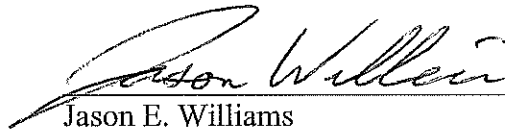
<u>Year</u>	<u>Tons of Ash to Landfill</u>
2017	12,749
2018	93,088

Attachment Public Staff Set 114 SUPP
Clover

<u>Year</u>	<u>Tons of Ash to Landfill</u>
1999	437,678
2000	494,640
2001	519,806
2002	505,469
2003	563,736
2004	572,906
2005	606,461
2006	654,013
2007	592,219
2008	567,786
2009	521,737
2010	560,267
2011	479,496
2012	445,635
2013	534,833
2014	487,627
2015	452,974
2016	409,864
2017	261,193
2018	251,914
2019	23,873

Dominion Energy North Carolina
2019 NC Base Case – Docket No. E-22, Sub 562
Public Staff
Data Request No. 140

The following response to Question No. 1 of Public Staff Data Request No. 140, dated July 22, 2019 has been prepared under my supervision.



Jason E. Williams
Director, Learning Development & Communications
Dominion Energy Services, Inc.

Question No. 1:

In its response to DR 114-1 (follow-up to DR 3-1), the Company stated the following:

Dominion does not have records of year to year ash volumes for its CCR impoundments. Storage capacity in CCR impoundments was managed through compliance with VPDES permits and visual observation. In addition, in many cases CCR from smaller ponds was periodically dredged and placed in larger ponds or landfills on site for permanent storage. Dominion is reassessing whether year to year storage volumes are available for some or all of its CCR Landfills, and it will supplement its response to this request if responsive information is identified.

Regarding the Company's CCR impoundments, where the Company does not have records of the amount of CCR disposed of each year, please provide any quantifications or estimates by the Company, its consultants, and/or its contractors for operational tracking, planning, permitting, or assessment purposes of ash volumes and/or weights over time. Please provide the data in spreadsheet format, including the month and year the quantity was determined.

Response:

Please see Attachment Public Staff 140, which contains a spreadsheet containing additional estimated ash volumes for Chesterfield. It should be noted the volumes reflected on the spreadsheet provided are a combination of soil and ash. It is not possible to know which portion of the volume reported was ash. As stated above, Dominion does not have records of year to year ash volumes for its CCR impoundments. Estimates of static ash volumes are provided in the CCR Rule compliance reports that are publicly available at:

<https://www.dominionenergy.com/company/community/environment/reports-and-performance/ccr-rule-compliance-data-and-information>. Those estimates are based on information that was available at the time the reports were developed.

Ash to UAP/LAP

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Jan	46,686	45,699	57,092	33,589	40,035	38,149	23,041	16,338	35,296	40,863	41,188	40,816	9,329
Feb	51,315	42,818	41,316	55,886	38,348	55,492	21,208	28,263	50,254	22,605	22,605	30,623	
Mar	54,352	50,859	40,381	48,220	50,906	56,401	38,112	25,308	31,945	29,062	29,062	22,346	
Apr	40,407	47,923	39,246	54,594	47,008	37,626	11,792	35,362	37,125	26,775	26,775	27,000	
May	35,603	59,489	66,870	42,762	44,459	39,877	11,304	27,771	39,887	26,463	26,463	20,387	
Jun	59,765	69,291	53,534	45,889	74,903	37,336	27,359	29,677	39,624	37,992	37,992	24,923	
Jul	50,281	57,631	79,734	54,261	72,934	49,786	42,360	76,820	49,124	41,161	41,172	29,732	
Aug	65,683	58,944	34,515	48,152	60,391	47,839	43,251	71,983	39,691	37,817	37,817	30,217	
Sep	42,196	44,944	57,818	41,871	42,624	36,923	27,467	61,638	36,770	35,732	35,732	24,862	
Oct	39,414	46,977	52,896	40,312	35,365	39,363	29,337	40,103	40,865	24,468	24,468	2,937	
Nov	25,090	48,174	25,056	34,792	24,985	19,972	22,095	30,596	34,136	31,323	31,323	9,659	
Dec	40,680	37,750	29,049	32,109	26,026	18,333	21,361	26,463	38,214	34,109	34,331	8,417	
	551,470	610,498	577,506	532,438	557,984	477,099	318,686	470,322	472,931	388,368	388,926	271,919	9,329

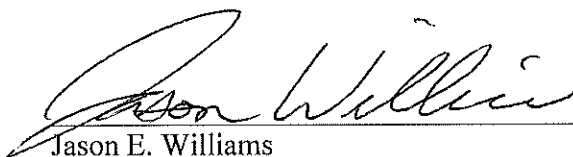
Combination of dirt and ash

Ash to Landfill

	2017	2018	2019
Jan	6,230	24,378	
Feb	7,805	5,954	
Mar		5,073	
Apr		387	
May		9,539	
Jun		8,583	
Jul		12,282	
Aug		15,000	
Sep		6,383	
Oct		354	
Nov		2,979	
Dec		7,387	
	14,036	98,299	

Dominion Energy North Carolina
2019 NC Base Case – Docket No. E-22, Sub 562
Public Staff
Data Request No. 169

The following response to Question No. 3 of Public Staff Data Request No. 169, dated August 9, 2019 has been prepared under my supervision.



Jason E. Williams
Director, Learning Development & Communications
Dominion Energy Services, Inc.

Question No. 3:

Pertaining to response provided to DR 140, please provide the following:

- a. Titles or specific links to the documents which contain static ash volumes at <https://www.dominionenergy.com/company/community/environment/reports-and-performance/ccr-rule-compliance-data-and-information>;
- b. This is the second time the Company has stated it does not have records of year to year ash volumes for its CCR impoundments. The Company did provide a spreadsheet of estimated ash volumes at Chesterfield. In DR 140, the Public Staff requested the following:

“Regarding the Company’s CCR impoundments, where the Company does not have records of the amount of CCR disposed of each year, please provide any quantifications or estimates by the Company, its consultants, and/or its contractors for operational tracking, planning, permitting, or assessment purposes of ash volumes and/or weights over time. Please provide the data in spreadsheet format, including the month and year the quantity was determined.”

Please provide the requested information for the sites in addition to Chesterfield where the Company does have records.

Response:

- a. See the closure plans at the above link for each CCR unit.
- b. After a thorough search for responsive information, all responsive documents for 3.b. have been provided in previous company responses.