Commonwealth of Virginia
General Assembly
RICHMOND

June 15, 2015

by email and first class mail

Secretary Molly Ward
Office of the Secretary of Natural Resources
Patrick Henry Building
1111 East Broad Street
Richmond, VA 23219

Re: Possum Point Power Station Coal Ash Ponds

Dear Secretary Ward,

I am writing regarding the coal ash ponds at the Possum Point Power Station, and Dominion’s March 30, 2015 “cap-in-place” proposal.

As you are aware, there are five old coal ash ponds at the Possum Point site, four of which are completely unlined, and all of which contain coal ash waste that contains high levels of metals and other contaminants. These ponds potentially leach numerous potentially harmful pollutants – including cadmium, selenium, arsenic, and zinc – all of which have been previously documented in discharges from the ponds, often at levels exceeding state standards. I am concerned about the impact these pollutants may be having on Quantico Creek, a popular recreational and commercial fishery and a tributary of the Potomac River as many Quantico Creek and fish caught in the Potomac River as a food source.

Two groundwater monitoring wells in closest proximity to residences sampled and analyzed in 2004 showed levels of some constituents above background but those wells are cross gradient and do not indicate a mitigation towards residential drinking water wells. This was consistent with prior sampling. Although those specific wells have not been sampled since 2004, another regularly sampled groundwater monitoring well that is located cross-gradient as well indicates the same result.

However, recent North Carolina news articles state that 93% of drinking water wells located near coal ash ponds are contaminated with dangerous heavy metals like hexavalent chromium, lead and vanadium, and public health agencies have advised residents not to drink or use well water for cooking. State agencies there are now revisiting coal ash closure plans as a result of new well testing data.

It is important for the DEQ and the public to have good information before considering Dominion’s “cap-in-place” proposal or making any decisions about how to best remediate the five coal
ash ponds at this facility. Therefore, I have two requests before any decisions are made:

(1) First, DEQ should obtain all recent sampling data for monitoring wells ED-22R and ED-23R, and that they be tested as soon as possible if no recent monitoring has been conducted.

(2) That DEQ work with the Virginia Department of Health to offer free testing of private drinking water wells for residents living along Possum Point Road near the coal ash ponds, to determine whether these wells have been affected by the ongoing leaks from the ponds into groundwater. DEQ should also consider offering the same water testing to residents living in close proximity to other coal ash ponds throughout Virginia.

This conservative approach to protecting public health has been implemented in North Carolina, and would certainly assure Virginians living near coal ash ponds that their well water is safe.

Lastly, I am concerned about the feasibility of a cap-in-place closure’s ability to prevent ponds from leaking through their sides and bottoms. As your agency considers Dominion’s proposal, I urge you to address the history of contamination at the site, and to make sure that any closure plan permanently halts the discharge of pollutants from these coal ash ponds and protects Quantico Creek, the Potomac River and the health of nearby residents.

At a minimum, DEQ would be well served by assessing the feasibility of at least taking the same precautionary approach as state environmental officials in South Carolina and North Carolina have taken, in requiring coal ash pond sites to empty their ponds and relocate this toxic waste to dry lined landfill storage away from rivers and drinking water sources. An approach that is consistent with other states would not put Virginia at any competitive disadvantage to other neighboring states.

Thank you for your careful consideration of this matter. I would welcome the opportunity to speak with you further about this issue, or to be of assistance in ensuring that we find a lasting solution to this problem.

Very Truly Yours,

Senator Linda “Toddy” Puller
36th District

Delegate Scott A. Surovell
44th District

cc: Governor Terrence R. McAuliffe
Hon. Mark R. Herring, Attorney General of the Commonwealth of Virginia
Mr. David Paylor, Director of the Virginia Department of Environmental Quality
Mr. William A. Hazel Jr., Secretary of Health and Human Resources
Mr. Bob Blue, Dominion Resources