

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 20, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. R. M. Singletary, Senior Vice President
Santee Cooper
One Riverwood Drive
Moncks Corner, South Carolina 29461-2901

Dear Mr. Singletary:

On June 28, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Jefferies facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Jefferies facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Jefferies facility is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Jefferies facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by May 20, 2011. Please send your response to:

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-237
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

This request has been approved by the Office of Management and Budget under EPA ICR Number 2350.01.

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosures

1.2 RECOMMENDATIONS

1.2.1 Recommendations Regarding the Structural Stability

Ash Pond A Dam and Ash Pond B Dam – None appear warranted at this time to satisfy a critical need; however, to eliminate concern about the lack of documentation, it is advised that Santee Cooper perform at least simplified, but conservative, documented analyses to verify static stability of the perimeter dike impounding Ash Pond A and Ash Pond B. Santee Cooper has indicated that they will evaluate the need to perform static stability analyses for the Ash Pond A and Ash Pond B Dams.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety

Ash Pond A Dam and Ash Pond B Dam – It is recommended that Santee Cooper review and document how the apparent off-site drainage toward Ash Pond A is handled and perform hydrologic/hydraulic analysis as may be required to document that the basins can safely store and pass the appropriate design flood. Santee Cooper has indicated that they will review and document how the off-site drainage toward Ash Pond A is handled and perform hydrologic/hydraulic analyses as may be required to document that the basins can safely store and/or pass the appropriate design flood.

1.2.3 Recommendations Regarding the Supporting Technical Documentation

Ash Pond A Dam and Ash Pond B Dam – Provide documentation as recommended above in Subsections 1.2.1 and 1.2.2. As previously noted, Santee Cooper has indicated that they will evaluate the need for 1) static stability analyses of the Ash Pond A and Ash Pond B Dams, 2) review and documentation of how the off-site drainage toward Ash Pond A is handled, and 3) hydrologic/hydraulic analyses as may be required to document that the basins can safely store and/or pass the appropriate design flood.

1.2.4 Recommendations Regarding the Description of the Management Unit(s)

Ash Pond A Dam and Ash Pond B Dam – None appear warranted at this time.

1.2.5 Recommendations Regarding the Field Observations

Ash Pond A and Ash Pond B Dam – None appear warranted at this time.

1.2.6 Recommendations Regarding the Maintenance and Methods of Operation

Ash Pond A Dam and Ash Pond B Dam – None appear warranted at this time.

1.2.7 Recommendations Regarding the Surveillance and Monitoring Program

Ash Pond A Dam and Ash Pond B Dam – In addition to the informal inspections of the spoil bank from a boat along the Tailrace Canal, it is recommended that more detailed inspections along the spoil bank be performed at least once per quarter and be documented by a written report or checklist. Santee Cooper has indicated that it will document annual inspections from a boat and further indicated that it will evaluate what is required to facilitate quarterly inspections on

the crest of the spoil bank. This would be a suitable alternative to quarterly documented inspections from a boat, as long as the land-based inspections are documented and suitable access trails are cleared along the spoil bank crest and other points of interest (e.g., to top edge of steep-sloped sections to check for tension cracks or to locations of any depressions, etc.) and at least one documented inspection from a boat is conducted annually. It is further recommended that internal inspection of the main outlet structure at Ash Pond B be performed at a frequency of at least once every 5 years and be documented with a written report.

1.2.8 Recommendations Regarding Continued Safe and Reliable Operation

Ash Pond A Dam and Ash Pond B Dam – No additional recommendations for continued safe and reliable operation appear warranted at this time, other than to document static stability of the Ash Pond A and Ash Pond B dams and hydrologic safety of Ash Pond A, and to periodically review downstream changes that may alter the hazard potential classification or assessment of the consequences of failure of the dams.