

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. James Landreth, Vice President
SCE&G
111 Research park Drive
Columbia, South Carolina, 29203

Dear Mr. Landreth:

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 Wateree 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 Wateree 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 Wateree 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 Wateree County 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

Enclosure 2
Wateree Recommendations

1.2.1 Recommendations Regarding the Structural Stability

Ash Pond 1 - Continue with the newly implemented maintenance and inspection programs.

Ash Pond 2 - Continue with the newly implemented maintenance and inspection programs.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety

Ash Pond 1 - None appear warranted at this time.

Ash Pond 2 - None appear warranted at this time.

1.2.3 Recommendations Regarding the Supporting Technical Documentation

Ash Pond 1 - None appear warranted at this time.

Ash Pond 2 - None appear warranted at this time.

1.2.4 Recommendations Regarding the Description of the Management Units

Ash Pond 1 - None appear warranted at this time.

Ash Pond 2 - None appear warranted at this time.

1.2.5 Recommendations Regarding the Field Observations

Ash Pond 1 - Vegetation should be cut or mowed on an as-needed basis to prevent the establishment of large woody-stemmed vegetation. Pot-holes in crest need to be repaired and corrected to prevent water from ponding.

Ash Pond 2 - Vegetation should be cut or mowed on an as-needed basis to prevent the establishment of large woody-stemmed vegetation. Pot-holes in crest need to be repaired and corrected to prevent water from ponding.

Subsequent to the site visit, the utility informed Dewberry that actions were taken consistent with the above recommendations.

1.2.6 Recommendations Regarding the Maintenance and Methods of Operation

Ash Pond 1 – Items in 1.2.5 need to be addressed. The implementation of monthly and annual inspections should help with discovering maintenances problems before they become a safety hazard.

Ash Pond 2 - Items in 1.2.5 need to be addressed. The implementation of monthly and annual inspections should help with discovering maintenances problems before they become a safety hazard.

Subsequent to the site visit, the utility informed Dewberry that actions were taken consistent with the above recommendations.

1.2.7 Recommendations Regarding the Surveillance and Monitoring Program

Ash Pond 1 – The newly implemented monthly and annual inspections need to

address monitoring any past or present seepage areas. One inactive and two active seepage areas were identified by SCE&G during our site visit.

Ash Pond 2 – The newly implemented monthly and annual inspections need to address monitoring any past or present seepage areas. One inactive and two active seepage areas were identified by SCE&G during our site visit

1.2.8 Recommendations Regarding Continued Safe and Reliable Operation

Ash Pond 1 - None appear warranted at this time.

Ash Pond 2 - None appear warranted at this time.