

US EPA ARCHIVE DOCUMENT



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August 4, 2009

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor; N-5738  
Washington, DC 20460

Dear Mr. Kinch:

This document is prepared in response to the letter from Mr. Barry N. Breen to Plant Manager, Urquhart Generating Station, 100 Urquhart Drive, Beech Island, South Carolina, Re: Request for Information Under Section 104(e) of the Comprehensive Environment Response, Compensation, and Liability Act, 42 U.S.C. 9604(e).

Please find attached my signed certifying document and responses to questions set forth.

Sincerely,



James M. Landreth

Enclosure

CC: Mr. Stephen A. Byrne, Sr. Vice President Generation, Nuclear & Fossil Hydro  
Plant Manager, Urquhart Generating Station

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 the 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: James M. Landrith

Title: VP

This request has been reviewed and approved by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C., 3501-3520.

Please send your reply to:

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

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

Mr. Richard Kinch  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Dr.  
5th Floor; N-5738  
Arlington, VA 22202 2733



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.***

The Urquhart Station ponds do not have a rating. Dams and reservoirs in South Carolina are regulated under the provisions of the SC Dams and Reservoirs Safety Act. In part, Rule 72-2.D of the SC Dams and Reservoirs Safety Act regulations states the following types of dams are exempt from the Dams and Reservoirs Safety Act:

“1. Unless the hazard potential as determined by the Department is such that dam failure or improper reservoir operation may cause loss of human life, any dam which is or shall be (a) less than twenty-five feet in height from the natural bed of the stream or water course measured at the downstream toe of the dam, or twenty-five feet from the lowest elevation of the outside limit of the dam, if it is not across a stream channel or water course, to the maximum water storage elevation and (b) has or shall have an impounding capacity at maximum water storage elevation of less than fifty acre-feet.”

Ash Pond 1 and Ash Pond 2 have approximate maximum heights of 8 and 14 feet, respectively, and have storage impounding capacities of less than fifty acre-feet each. Therefore, the ponds are exempt from the Act per Rule 72-2.D.1 and no ratings have been assigned.

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

Ash Pond 1 and Ash Pond 2 were commissioned in 1977 and have received waste to the present.

The description for management units for coal combustion residuals/by-products offered in the USEPA March 9, 2009 letter is widely encompassing and could be broadly interpreted to include the following other ponds/basins at the Urquhart Steam Power Station:

- Metals Pond
- The Low Volume Waste Pond
- Ash Landfill Runoff Basin
- Low Volume Waste Polishing Pond
- Stormwater Runoff Pond

The above ponds/basins are primarily used for wastewater treatment purposes and are not designated as landfills/impoundments for the storage or disposal of coal combustion byproducts. SCE&G therefore believes that these ponds/basins

are not consistent with the intentions of EPA's Request for Information and we have limited our responses to Urquhart Station's Ash Pond 1 and Ash Pond 2.

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).***

Ash Ponds 1 and 2 contain fly ash, bottom ash, pyrites, and boiler slag.

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?***

Ash Ponds 1 and 2 were designed by a Professional Engineer. The role of a Professional Engineer in the supervision of the pond construction cannot be verified.

Routine, scheduled inspections and monitoring of the ash ponds are not performed under the supervision of a Professional Engineer. Currently, SCE&G performs assessments/evaluations of the dike structure for both ash ponds as part of the NPDES permit on a quarterly basis. The results are internally documented. The annual inspection reports are not submitted to DHEC unless a finding is identified or a corrective action plan is required. A daily visual inspection is performed to look for signs of cracking, settling, slope movement, erosion and vegetative growth. If any follow up action is required, a Work Order is written and the items completed and closed out in a timely manner. All follow up actions to date have been for minor maintenance.

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?***

SCE&G is not aware of any previous assessments/evaluations of the structural integrity of the Ash Ponds.



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.*

SCE&G is not aware of past inspections by State or Federal officials for the purpose of evaluating the safety (structural integrity) of the Ash Ponds. SCE&G is not aware of any planned State or Federal inspections in the future.

The South Carolina Department of Health and Environmental Control (SCDHEC) periodically inspect the ash ponds. However, these inspections are generally for NPDES permit compliance purposes and do not involve evaluations of the structural integrity of the ponds.

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.*

No.

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

Ash Ponds 1 and 2 are not used for the permanent storage of ash, and are periodically dredged (approximately once every 12 to 18 months) to remove a variable quantity of the accumulated ash waste materials.

Ash Pond 1 has a surface area of approximately 1.4 acres and a total maximum calculated storage capacity of approximately 18,000 cubic yards. When dredged, the volume of materials removed from Ash Pond 1 is estimated to be about 5,000-6,000 cubic yards.

Ash Pond 2 has a surface area of approximately 0.8 acres and a total maximum estimated storage capacity of approximately 11,500 cubic yards. When dredged, the volume of materials removed from Ash Pond 2 is estimated to be about 1,000 cubic yards.

The maximum heights of Ash Ponds 1 and 2 are approximately 8 and 14 feet, respectively.

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).*

Upon information and belief, there have not been any spills or unpermitted releases from the Ash Ponds within the last ten years.

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

The Urquhart Steam Power Station facility to include the subject Ash Ponds is legally owned and operated by South Carolina Electric & Gas.