

US EPA ARCHIVE DOCUMENT

May 18, 2011

**VIA FEDERAL EXPRESS**

Mr. Stephen Hoffman  
US Environmental Protection Agency  
Two Potomac Yard  
2733 South Crystal Drive  
5th Floor, N-5237  
Arlington, VA 22202-2733

Subject: Final Impoundment Assessment Report  
Plan and Schedule  
Grainger Generating Station – Conway, SC

Dear Mr. Hoffman:

South Carolina Public Service Authority (Santee Cooper) received and reviewed the final impoundment assessment report for the Grainger Generating Station which resulted from the site assessment conducted by EPA's engineering contractor, GEI Consultants, Inc., on June 24, 2010.

EPA's engineering contractor has rated the Grainger Generating Station impoundments in accordance with the National Inventory of Dams rating criteria. Ash Pond #1 is rated as having a "Less than Low" hazard potential and Ash Pond #2 is rated as having a "Low" hazard potential. Santee Cooper concurs with these ratings. Santee Cooper has an excellent track record with regard to the safety of our coal combustion residual storage impoundments and is fully committed to maintaining this record.

The final report includes two recommendations to collect and assess information to insure the continued structural integrity of Ash Pond #2. Santee Cooper responds to each of these recommendations as follows:

**12.1 Corrective Measures and Analyses for the Structures**

**Recommendation –**

*Santee Cooper should complete and document a preliminary evaluation of site seismicity, seismic slope stability and liquefaction potential of the Ash Pond #2 dike to determine whether a more detailed seismic study is necessary. Although State and Federal regulatory agencies do not mandate that seismic evaluations be performed for embankments classified as small and low hazard, it would be prudent engineering to check whether seismic loads could affect the safety of the dike.*

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Response -

Given the low height and generally low consequences of failure, the generally good condition of the basins and embankments, exceptional performance record, and satisfactory condition rating for Ash Pond #2; preliminary seismic stability and liquefaction potential analyses are not considered critical. However, Santee Cooper will perform a preliminary evaluation of site seismicity, seismic slope stability, and liquefaction potential of the Ash Pond #2 dike and document whether or not more detailed studies are necessary. Santee Cooper will provide the necessary documentation by March 29, 2012.

**12.2 Corrective Measures Required for Instrumentation and Monitoring Procedures**

Recommendation -

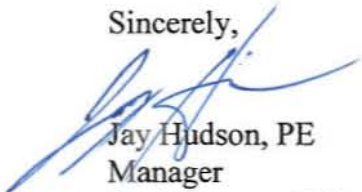
*Santee Cooper should review the water level readings recorded in the groundwater quality wells at the toe of Ash Pond #2 to monitor any changes in the piezometric surface, and estimate the piezometric surface in future stability studies.*

Response -

Santee Cooper agrees to continue the current schedule of groundwater well readings at the toe of Ash Pond #2. In addition, Santee Cooper will continue the schedule of staff gauge readings in and adjacent to Ash Pond #2. Together these readings are used to monitor changes in the piezometric surface. These readings will also be used to estimate the piezometric surface for the preliminary stability study. The preliminary stability study will be completed by March 29, 2012.

Santee Cooper makes no confidentiality claims with respect to material contained in the report or with respect to this correspondence. Please contact me at 843-761-8000 if you have any questions.

Sincerely,

  
Jay Hudson, PE  
Manager  
Environmental Management

JAH:SWJ:DBB:dss

[Attachment](#)