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SCE&G®
A SCANA COMPANY

May 18, 2011

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

Re: Response to April 20, 2011 letter on coal combustion residual (CCR) site assessment at the Wateree facility

Dear Mr. Hoffman:

On behalf of South Carolina Electric & Gas Company (SCE&G), I hereby submit our formal responses to the EPA's recommendations concerning the structural stability of the wet storage coal combustion residuals site assessment for the Wateree Station.

1.2. 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.

SCE&G Response: SCE&G agrees with EPA recommendations.

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.

SCE&G Response: SCE&G agrees with EPA recommendations.

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.

SCE&G Response: SCE&G agrees with EPA recommendations.

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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.

SCE&G Response: SCE&G agrees with EPA recommendations.

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.

SCE&G Response: SCE&G did take immediate action as recommended by Dewberry Associates to remove woody-stemmed vegetation and to repair pot-holes in the crest of both ash pond man-made dikes. SCE&G plans to follow its newly implemented inspection and maintenance programs to identify and make timely correction of such findings.

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.

SCE&G Response: SCE&G has implemented a comprehensive monthly and annual inspection and maintenance program for its coal combustion residual wet storage structures.

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.

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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

SCE&G Response: SCE&G has implemented a comprehensive monthly and annual inspection and maintenance program for its coal combustion residual wet storage structures that includes monitoring for seepage. In addition, SCE&G conducted engineering soils analysis and performed the following major activities within the interior of pond 1, as a means to mitigate identified seepage through a naturally occurring sandy lens from this pond: installed dewatering sumps, excavated coal combustion residuals along an approximate 750 foot natural earthen embankment section of the pond, placed a clay barrier keyed into the existing impermeable sub-surface, installed a geomembrane on top of the clay barrier and covering the entire surface of the 750' sloped embankment, covered the area with suitable soils, and seeded. Through this work and visual monitoring, SCE&G has successfully mitigated the seeps from ash pond 1.

SCE&G pointed out to Dewberry Associates during the inspection on Ash Pond 2 an area where a seep was thought to have occurred some years ago. This area has been routinely monitored for some time now and there are no active seeps outside of Pond #2.

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.

SCE&G Response: Through its comprehensive monthly and annual inspection and maintenance program, SCE&G has enhanced its safe and reliable operation of the Wateree ponds.

Sincerely,

James M. Landreth

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