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May 15, 2009

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

Dear Mr. Kinch:

This document is prepared in response to the letter from Mr. Barry N. Breen to Plant Manager, Wateree Generating Station, 142 Wateree Station Road, Eastover, 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), received by SCE&G on May 4, 2009.

Please find attached my signed certification and responses to questions set forth in Enclosure A.

Sincerely,

James M. Landreth

Cc: Mr. Stephen A. Byrne, Sr. Vice President Generation, Nuclear & Fossil Hydro
Plant Manager, Canadys Steam Power 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: James M. Landreth
Name: James M. Landreth
Title: Vice President
Date: 5/15/2009

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 Wateree Station ash ponds do not have a rating. Dams and reservoirs in South Carolina are regulated pursuant to the SC Dams and Reservoirs Safety Act and the regulations pertaining thereto. Regulation 72-2.D.1 of the SC Dams and Reservoirs Safety Act Regulations exempts the following types of dams 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."

Both "Ash Pond 1" and "Ash Pond 2" at Wateree Station have an approximate maximum berm/embankment height of 20-24 feet respectively. Since both of the ponds are less than 25 feet in height, the ponds are exempt from the Act per Regulation 72-2.D.1 and therefore no ratings have been assigned.

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

Ash Ponds 1 and 2 were commissioned in the early 1970's and have received waste to the present. Ash Ponds 1 and 2 act as the primary settling pond and polishing pond, respectively, for ash sluicing operations.

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 Wateree Steam Power Station:

- Coal Pile Runoff Pond
- Low Volume Waste Ponds 1 & 2

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 Ash Ponds 1 and 2.

3. ***What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (l) 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?***

   At this time, SCE&G does not have sufficient information to confirm that Ash Ponds 1 and 2 were designed by a Professional Engineer and that the construction of the ash ponds was performed under the supervision of a Professional Engineer.

   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 an annual 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?***

   Structural integrity assessments/evaluations were performed for the Ash Ponds in 1994. The assessments/evaluations were performed by Parsons Main, Inc.

(currently Parsons, Inc.), one of the world's largest multidisciplinary engineering consulting firms. Subsequent to the assessments/evaluations, Parsons Main, Inc. prepared a plan that included placement of soil fill along the inner slope of the Ash Pond 1 dike to provide additional buffer between the Ash Ponds and the near river, and enhance the stability of the ash ponds' dikes. Crowder Construction Company implemented the plan. Crowder Construction Company, founded in 1947, is a heavy construction general contractor who performs projects throughout the Southeast.

SCE&G is not aware of any other structural integrity assessments/evaluations performed for the ash ponds beyond those discussed above.

SCE&G currently intends to perform assessments/evaluations of the structural integrity of both ash ponds in 2009.

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 inspects 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 Pond 1 has a surface area of approximately 80 acres and a total estimated storage capacity of approximately 1,936,000 cubic yards. Ash Pond 1 is currently near capacity, and current pond management practices include routine removal of ash from the pond for beneficial off-site reuse (recycling).

Ash Pond 2 has a surface area of approximately 80 acres and a total estimated storage capacity of approximately 1,936,000 cubic yards. The volume of materials currently stored in Ash Pond 2 is estimated to be approximately 421,000 cubic yards. SCE&G's estimate of the volume of materials currently stored in Ash Pond 2 is based on a detailed bathymetric survey of the pond performed in October 2006 and an estimate of average ash thickness across the surface area of the pond.

The maximum berm/embankment height for Ash Ponds 1 and 2 is 24 feet.

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 Wateree Steam Power Station facility to include the subject ash ponds is legally owned and operated by SCE&G.