Comments

EPA: None

State: None

Company: See letter dated October 15, 2010

James M. Landreth
Vice President
Fossil Hydro Operations

SCE&G®
A SCANA COMPANY

October 15, 2010

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

Subject: Coal Combustion Waste Impoundment
Round 5 – Dam Assessment Report
Wateree Station, Ash Pond 1 & 2
South Carolina Electric & Gas Company (SCE&G)
Eastover, SC

Dear Mr. Hoffman,

SCE&G has reviewed the DRAFT Assessment Report for the Wateree Station Ash Ponds that was prepared by Dewberry & Davis, LLC, on behalf of the United States Environmental Protection Agency. The report concludes from the onsite inspections conducted on June 28th, 2010, and ensuing records review that the Wateree Station Ash ponds are structurally stable, entirely safe and in good working order. Obviously, SCE&G is pleased that this assessment concurs with the findings of a recent Ash Pond Containment Structure Subsurface Investigation and Structural Stability Report that was commissioned by us.

Since you have requested our comments, there are several items in the DRAFT Assessment Report that we believe deserve further clarification. Page 2-2 states "Ash Pond 1 is assumed to be completely full of ash according to a hydrologic and hydraulic study provided by SCE&G dated October 2006". No mention is provided as to ongoing ash excavation/recycling activities within the pond and resultant maintenance of pond settling capacity. We ask that you consider adding a follow-up statement noting SCE&G's common practice to excavate and remove ash from within Pond 1 for recycling and pond performance. Thus, the pond is dynamic with regards to the accumulation and removal of ash and we believe this helps to clarify that the pond is still functional. Additionally, Section 6.1.3 twice references "Fly Ash Pond," which is incorrect. The term used throughout the rest of the Draft Report is "Ash Pond."

The CONCLUSIONS AND RECOMMENDATIONS Section of the report (Section 1.0) notes that minor maintenance items need to be monitored although they do not present a safety issue. This completely matches what we heard during the exit meeting on June 28th, when Mr. Shmurak and Mr. Story of Dewberry & Davis mentioned two minor maintenance items that had no negative structural effect on the impoundment but needed follow-up. That same week, we

100 SCANA Parkway • Cayce, SC • P (803) 217-7224 • F (803) 933-8241 • jlandreth@scana.com
Mailing Address 220 Operation Way • MC A221 • Cayce, SC • 29033-3701

took immediate action to implement those recommendations. Specifically, we completed the following:

- The crests of all the impoundment structures were bladed to remove the potholes All of the small pine trees noted on the Western slope of the embankment were removed and the soil stabilized to prevent erosion on the upstream slope.
- Monthly and annual inspections of the Ash Ponds were implemented in July 2010 and include inspections of seeps that were formerly done on an annual basis.

We ask that you consider supplementing the discussion in Section 8.0 and clarify Section 8.3.2 so that it is consistent with the conclusions in Section 1.0. Specifically, Section 1 concludes that no safety issues were found, just maintenance items that need to be monitored to include the cutting and mowing of vegetation on an as-needed basis to prevent the establishment of large woody-stemmed vegetation and the repairing of pot-holes in the crest to prevent water from ponding.

Thank you for this opportunity to comment. Should you have any questions or need additional information, please do not hesitate to contact me by phone or email.

Sincerely,

James M. Landreth
Vice President
Fossil Hydro Operations

cc: James Kohler (EPA)
M. C. Summer
J. K. Todd
T. N. Effinger
J. C. Younan
J. H. Hamilton
G. E. Williams/A. D. Kelly
T. Miller/J. R. Devereaux
File