DEPARTMENT OF THE ARMY
CHARLESTON DISTRICT, CORPS OF ENGINEERS
69A HAGOOD AVENUE
CHARLESTON, SC 29403-5107
MAY 23 2018

Regulatory Division

Mr. Thomas N. Effinger
Director, Corporate Environmental Services
SCANA
Mail Code C-221
220 Operation Way
Cayce, South Carolina 29033-3701

Dear Mr. Effinger:

I am writing in response to your letter, dated March 19, 2018, on behalf of SCE&G/ SCANA (SCE&G) regarding the U.S. Army Corps of Engineers, Charleston District's (Corps) Nationwide Permit (NWP) 38 verification letter, dated October 18, 2017, for SCE&G's Congaree River Sediment Capping Project (CRSCP) of the Tar-like Material (TLM) in the Congaree River. It is the Corps' understanding that the Corps' NWP 38 verification letter is associated with SCE&G's ongoing coordination efforts with the South Carolina Department of Health and Environmental Control (DHEC) as the state agency with established legal and contractual authority over the cleanup effort, including pursuant to Voluntary Cleanup Contract # 02-5295-RD (VCC). The Corps further understands that SCE&G is continuing to coordinate with DHEC to identify a preferred final remedy pursuant to the ongoing execution of the VCC for the TLM material in the Congaree River.

As an update to these efforts, the introduction to your letter reports that SCE&G submitted to DHEC a Sediment Capping Work Plan (SCWP) on November 30, 2017. The introduction to your letter also references SCE&G's apparent position that "a cofferdam installed in the Congaree River would present more risk than is allowed under the Individual Permit program administered by the U.S. Army Corps of Engineers (USACE)." Finally, your introduction section requests clarification from the Corps "regarding the criteria that prevented issuing a permit for the proposed cofferdam in the Congaree River."

After a detailed background explanation of the history of SCE&G's TLM cleanup efforts in the Congaree River, your letter further poses four additional clarification questions regarding the Corps' prior review of SCE&G's Department of the Army (DA) permit application for the cofferdam removal approach for the TLM in the Congaree River that SCE&G abandoned in lieu of pursuing the capping approach, which the Corps verified under NWP 38, as referenced above. Responses to your clarification questions appear towards the end of this letter.

Clarification of the Corps' Prior Review of TLM Removal Options

As an initial matter, SCE&G's characterization of the Corps' position (or prior determination) that "a cofferdam installed in the Congaree River would present more risk than is allowed under the Individual Permit program . . ." is inaccurate. The Corps never reached such a conclusion. As you know, at the request of SCE&G, through its coordination with DHEC, the

Corps never completed its review of the original DA permit application associated with the TLM removal options, including the cofferdam proposal. As cited in your letter, in the summer of 2016 SCE&G abandoned all removal options in lieu of pursuing a TLM capping project at DHEC's written request due to what the Corps understands to be previously unforeseen issues with implementing the cofferdam proposal, including the breach of the Columbia Canal and the resulting newly deposited sediment in the Congaree River in October 2015. Due to the abandonment of the removal option, the Corps never rendered a final decision on the application, including with regard to risk associated with a cofferdam.

Similarly, SCE&G's assertion that its decision to abandon the cofferdam approach was ***exclusively*** a product of the Corps' incomplete review of the DA permit application associated with TLM removal options misstates the record. On this particular topic, the narrative in the background section of your March 19th letter states as follows:

> "Ultimately, the [Corps] identified significant risks and concerns during the permitting process and communicated those concerns in a January 2015 meeting with SCDHEC and SCE&G . . . In light of these concerns, the [Corps] **questioned** the feasibility of constructing a cofferdam that would meet the conditions necessary to obtain a permit. Because SEC&G was unable to completely address [Corps] concerns after multiple submittals, SCE&G began to explore other project alternatives in collaboration with the resources agencies."

SCE&G letter, dated March 19, 2018 (emphasis added). To be sure, the Corps' review of the TLM removal proposal in 2013 and 2014 did ***question*** the constructability of the proposed cofferdam in the Congaree River. In fact, the Corps' letter dated May 29, 2014 raised numerous concerns about the cofferdam's design regarding navigation, flooding, and the potential for catastrophic failure that were discussed further in January 2015. However, the Corps did not express a conclusion that "any removal would create too much risk in the River."

The implication that SCE&G's January 2015 decision to abandon the pursuit of the DA permit for the cofferdam proposal was necessitated by what amounted to a deemed denial based upon the Corps' concerns for flooding and catastrophic failure is inconsistent with SCE&G's prior explanations. Specifically, by letter dated February 18, 2015, SCE&G notified DHEC as follows:

> "In summary, given the physical characteristics of the river, the horizontal extent of the TLM-impacted area and based on the information developed during the design/permitting phase of the project, the risks and potentially negative impacts associated with constructing the requisite cofferdam, as currently designed, outweigh the benefits of removal using the cofferdam approach.
>
> However, the 'large' cofferdam approach was merely an option to facilitate a complete and effective removal action. Based on the information discussed above, SCE&G is requesting that SCDHEC consider a modified removal action of the TLM as described/proposed below."

SCE&G letter, dated February 18, 2015. And by email dated March 13, 2015, SCE&G provided the following explanation to the Corps:

> "Due to the magnitude of the original project scope and the inherent construction difficulties with the original task as defined by SCDHEC, the project scope has been redefined to focus remediation of the river in the areas with the greatest potential for exposure of the general public. As a result, the project has been reduced in scope to alleviate previous concerns."

SCE&G email, dated March 13, 2015. We appreciate that "SCE&G has persistently tried to address [stakeholder] concerns without speaking on behalf of the [Corps]," but want to be clear that the above statements represent SCE&G's own conclusions and do not reflect any similar conclusions by the Corps.

Documentation indicates that SCE&G's and DHEC's subsequent decisions in the summer of 2016 to abandon the TLM removal options and pursue a capping project resulted from SCE&G's assessment of the Field Demonstration Project (FDP) in combination with the substantial flooding event in early October 2015. For example, your letter acknowledges that the "factors identified earlier by the [Corps] and 'stated in SCDHEC's [August 16, 2016] letter . . . were substantiated by the flood event.'" These SCE&G and DHEC decisions effectively mooted any DA permit decision by the Corps on TLM removal options because further Corps review of TLM removal options was cut short at SCE&G's and DHEC's request. Specifically, on August 16, 2016, DHEC notified SCE&G that, "[t]he Department has reevaluated the available options presented in the [2013 Engineering Evaluation / Cost Analysis] and has determined that based on the construction and permitting limitations, **it is not feasible to conduct a removal of TLM / impacted sediment in the Congaree River**." (emphasis added). Similarly, by letter dated September 22, 2016, SCE&G notified that Corps that, "[f]or numerous reasons as detailed in the SCDHEC letter [dated August 16, 2016] . . ., the excavation and removal approach has been abandoned and SCE&G has now been directed to pursue a capping approach."

In summary, Corps did not dictate the key decisions by SCE&G and DHEC in this process, including: SCE&G's decision in January 2015 not to address the Corps' questions; SCE&G's and DHEC's decisions in August-September 2016 to abandon the TLM removal options altogether; SCE&G's and DHEC's collective decisions for purposes of the VCC to include what TLM cleanup project constitutes an appropriate "response action" and/or "final remedy" in the Congaree River; and, any decisions as to the ultimate permitability of various TLM removal options. The Corps did express concerns as part of the permit evaluation process, but SCE&G reached its own conclusion that "[d]ue to the magnitude of the original project scope and the inherent construction difficulties with the original task as defined by SCDHEC, the project scope has been redefined . . ." The Corps never informed either SCE&G or DHEC that applicable criteria prevented the Corps from issuing a permit for the proposed cofferdam in the Congaree River (or any TLM removal project for that matter). Accordingly, to the extent SCE&G would like to renew exploration of the cofferdam proposal (or any other TLM cleanup project subject to the Corps' regulatory authority), the Corps would welcome the opportunity to meet with SCE&G, DHEC, and the City of Columbia to further explore the Corps' DA permit review process.

Explanation of the Corps' Permitting Role (As Distinguished From DHEC's VCC Authority)

Prior to responding in detail to your four clarification questions, further explanation of the substantive differences between the Corps' and DHEC's respective roles with regard to

SCE&G's TLM cleanup efforts in the Congaree River may be helpful. When a DA permit applicant submits a proposed project for Corps review, the Corps is neither an opponent nor a proponent of the project. In this case, the various TLM removal options explored by SCE&G and submitted for Corps review all related to a state-sponsored TLM cleanup effort by SCE&G subject to DA permitting requirements pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. The Corps does not share DHEC's substantive state oversight role of SCE&G's cleanup efforts for the Congaree River (as contractually implemented through the VCC) with regard to the proposed scope, goals, and purpose of any state-sponsored cleanup efforts. The Corps will review a DA permit application for a TLM cleanup project that SCE&G prepares and submits for review for compliance with Sections 10/404, but in contrast to DHEC does not (as memorialized in the VCC) plan, formulate, select, dictate, and/or decide what constitutes an appropriate "response action" and/or "final remedy." Indeed, SCE&G's letter to the Corps dated February 19, 2015 recognizes DHEC's substantive authority to decide what project SCE&G would submit for Corps review: "If SCDHEC directs SCE&G to move forward with the Modified Removal Approach, SCE&G will contact [the Corps] to set up a meeting to discuss the details and procedures for moving forward."

SCE&G's Four Clarification Questions

As a general response to your four clarification questions, please be advised that the Corps does not provide pre-decisional, speculative advisory opinions regarding whether or not a proposed project that is subject to the Corps' regulatory authority would hypothetically, or ultimately, receive a favorable DA permit decision. Regardless, as stated above, the Corps has (and will) review any TLM-related projects (DHEC-sponsored through a VCC or otherwise) that are submitted to the Corps pursuant to its regulatory authority. As in all cases, the onus would continue to be on SCE&G, as the applicant, to provide to the Corps sufficient information to inform a DA permit decision on any such project.

1. Why did the USACE request a "lower flow sensitivity study" to evaluate the impact that the installation of a cofferdam would have under "normal" river conditions (lower than 100-year, 50-year, and 10-year flows)? Is there a FEMA requirement or some other regulation that requires it?

In January 2014, SCE&G provided to the Corps a draft backwater analysis, which indicated that the 10 year flow overtopped the cofferdam (on the order of 17 feet). However, because the impacts of the coffer dike and blockage of flow conveyance area (a cross-sectional reduction from 660 feet wide to 396 feet) were not captured (even in the final backwater analysis dated May 1, 2014), it remained unknown to the Corps: (1) how (and if) lower flows would be impacted by the cofferdam; and (2) under what circumstances the cofferdam would overtop.

Although SCE&G provided to the Corps a copy of an application for a No-Rise Certification, the Corps never received any official approval of this application from any local floodplain managers (*e.g.*, Richland County, City of Columbia, City of West Columbia, etc.). Beyond the contents of that application, the Corps does not know whether further information was requested of SCE&G in response to that application and/or whether a No-Rise Certification was ultimately issued by any local floodplain manager(s).

It is further noted that floodplain management is a mandatory public interest consideration in the Corps' evaluation of a DA permit application. Executive Order (EO) 11988, as referenced in Corps regulations at 33 C.F.R. 320.4(l), reflects, among other things, the need to determine whether there is a practicable alternative to adverse impacts associated with the occupancy and modification of floodplains and, if not, measures to minimize floodplain impacts and the risk of flood losses. DA Permits may include special conditions to ensure that floodplain impacts are consistent with EO 11988 and the public interest.

2. Why did the USACE conclude that the river rise of 6.4 feet and increased channel width of 124 feet during normal river conditions were not acceptable?

To date, the Corps has never taken a position for purposes of the Corps' review of SCE&G's prior DA permit application associated with the cofferdam proposal that the river rise of 6.4 feet and increased channel width of 124 feet during normal river conditions were not acceptable. Many of the Corps' previous concerns are documented in a letter to SCE&G, dated May 29, 2014, as well as an internal Corps email dated September 17, 2014 (enclosed).

With regard to the Corps' specific concerns in the context of your clarification question, the Corps requested inundation maps to review the impact of the 124 feet increase in channel width to determine impacts, and noted again the need for a remedial plan for cleanup when the dike overtopped. During the prior review of the cofferdam proposal, the Corps specifically questioned Section 2.4 of SCE&G's Cofferdam Lower Flow Sensitivity Study dated August 11, 2014, which stated that, "since the cofferdam may only overtop by a few feet during the sensitivity study flow conditions, the area within the cofferdams has been designated as an ineffective flow area." In response, the Corps responded with the following technical concerns:

> "There should be no water behind the cofferdam until it overtops and then it can be designated ineffective flow area (fills up like a bathtub). But until it overtops, it is blocked from water completely - correct? This is what the model assumed? Please verify and if so then they need to reword it."

SCE&G provided inundation maps in September of 2014, but only for the 10, 50, and 100 year frequency and near crest of cofferdam and modified 120 foot elevation. The inundation maps for the lower flow sensitivity analysis were never provided. The Corps' review of what was provided (*e.g.*, 10, 50, and 100 year frequency and near crest of cofferdam and modified 120 foot elevation) indicated that there was still not a comparison of the baseline river conditions versus the proposed cofferdam condition for purposes of evaluating the water surface elevation impact. Regardless, SCE&G's analysis indicated a rise in water surface elevation, and the inundation maps showed flooding in the river walk area, as well as in adjacent property owner's back yards. As a result, it was the Corps' recommendation that SCE&G contact the adjacent property owners to make them aware of flooding concerns, and, further, that SCE&G should seek the adjacent property owners' concurrence/acknowledgement of the flood risk.

Finally, the Corps' review questioned SCE&G's analysis that the cofferdam proposal would result in a reduction in water surface elevation due to constricting the channel width. Because this would result in increased flow velocities in the river, the Corps identified a potential for scouring to occur. As a result, the Corps suggested that SCE&G formulate a plan for

restoration of the river bed due to scouring if this portion of the river was not a rock channel bottom.

Beyond the above concerns, to the extent SCE&G submits a new (or renewed) DA permit application for the cofferdam removal approach (or any other TLM cleanup project subject to the Corps' regulatory authority), the burden would be on SCE&G to provide for Corps review the anticipated river rise and increased channel width that would result from such project.

3. Would a water level change that did not exceed 1.0 foot be acceptable? If not, what would be an acceptable river rise and channel width increase during lower flows? Are these criteria or relevant guidance specified in any regulation or other document?

To date, the Corps has never taken a position for purposes of the Corps' review of SCE&G's prior DA permit application associated with the cofferdam proposal that the Corps required a water level change of 1.0 feet or less. Although the Corps routinely requests and reviews anticipated water level changes associated with a proposed project, the Corps does not determine what constitutes acceptable versus unacceptable changes in water levels. As discussed in the Corps' response to clarification question two above, in scenarios where the Corps' review identifies a flood risk during the review of a DA permit application, the Corps generally recommends that an applicant contact the adjacent property owners to make them aware of flooding concerns, and to request the adjacent property owner's concurrence/acknowledgement of the flood risk. This approach is generally consistent with the Corps' review of flood hazards and floodplain management concerns, including consideration of EO 11988, as mandatory public interest considerations in the Corps' evaluation of a DA permit application.

As stated above, in the event SCE&G submits a new (or renewed) DA permit application for the cofferdam removal approach (or any other TLM cleanup project subject to the Corps' regulatory authority), the onus would be on SCE&G to provide for Corps review the anticipated water level change that would result from such project.

4. Would the USACE suspend the sediment cap authorization (i.e. extend the permit expiration date) under NWP 38 until such time as the revised removal approach evaluation could be completed?

In accordance with Corps regulations, a District Engineer's discretionary authority to suspend a NWP verification letter is designed to stop a permittee from undertaking "activities being done in reliance upon the authorization under the NWP," rather than to toll the authorization period while the permittee explores other alternatives in lieu of implementing an authorized project under a given NWP verification letter. See 33 C.F.R. 330.5(d)(2)(ii).

However, the Corps' NWP 38 verification letter makes clear that SCE&G has until March 18, 2022 (with the possibility of a 12 month extension of this expiration date) to complete the authorized activities associated with the CRSCP. Therefore, the Corps does not believe that suspension of the NWP 38 verification letter would be necessary or warranted until such time as the Corps is prepared to issue a DA permit/authorization for a different project altogether, should that occurrence arrive prior to March 18, 2022. If SCE&G submits a DA permit application for a newly proposed TLM cleanup project (*e.g.*, TLM removal via cofferdam, etc.), and the Corps completes its review of such DA permit application prior to March 18, 2022, the

Corps would consider suspending and revoking the NWP 38 verification letter for the CRSCP prior to issuing a DA permit/authorization for an alternative TLM cleanup project.

In all future correspondence concerning this matter, please refer to our file number SAC-2011-01356. A copy of this letter is being forwarded to certain Local, State and Federal entities for their information. We would welcome the opportunity to meet with SCE&G, DHEC, and the City of Columbia to discuss this response, and to further explore the Corps' DA permit review process with regard to any TLM-related cleanup efforts in the Congaree River that SCE&G and DHEC deem appropriate. If you have any questions concerning this matter, please contact Brice McKoy at 803-253-3994.

Sincerely,

Travis G. Hughes
Chief, Regulatory Division

Enclosures

Copies Furnished:

Ms. Myra Reece
Director of Environmental Quality Control
S.C. Dept. of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Ms. Nancy McKee Perez
Senior Technical Advisor
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
US EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Mayor Stephen K. Benjamin
City of Columbia, Office of the Mayor
P.O. Box 147
Columbia, South Carolina 29217

REC'D 6/2/14

DEPARTMENT OF THE ARMY
CHARLESTON DISTRICT, CORPS OF ENGINEERS
1835 Assembly Street, Room 865 B1
COLUMBIA, SOUTH CAROLINA 29403-5107

REPLY TO
ATTENTION OF

May 29, 2014

1

Regulatory Division

Andrew Contrael
Management and Technical Resources, Inc.
1600 Commerce Circle
Trafford, Pa 15085

Dear Mr. Contrael:

This is in response to your application for a Department of the Army permit (P/N 2011-01356-6NO) to remove a Tar Like Material and construct a temporary cofferdam in the Congaree River, just south of the Gervais Street Bridge, in Richland County, South Carolina.

As you are aware, a public notice advertising this application was issued on August 23, 2013, wherein written comments of parties interested in or affected by this work were solicited. The purpose of this public notice was to gain the views of the various State and Federal agencies and affected parties so that the Corps could better determine whether to approve or deny the proposed project. In response to the public notice, comments were received from US Fish and Wildlife Service, SC Department of Natural Resources, the Congaree River Keeper, Friends of the Congaree Swamp, National Marine Fisheries Service, and adjacent property owners. Copies of these letters are enclosed for your review and consideration. In addition, please provide the following information regarding the Corps concerns as outlined in our previous letter dated July 19, 2013:

- In regard to concerns of adjacent property owners, there has been discussion in recent meetings about the possibility of constructing an alternate truck route that will potentially include impacts to waters of the U.S. Please provide this office with the appropriate information (permit drawings, mitigation plan, etc.) concerning the proposed alternate route.

- Please provide a project schedule that includes any revisions that may have occurred since the project was put out on public notice as well as a discussion of construction sequencing that indicates the duration of the entire project as well as the duration of all temporary impacts.

- Please provide this office with a detailed plan that will ensure that navigation will be maintained during the entire construction period so boaters on the Congaree River will be aware they are entering the construction site and are notified of any changes to navigation. The plan should include methods to maintain safety to the boating public (lighting, signage, noticing, etc.).

- Please provide this office with a detailed erosion and sediment control plan for this project. This plan must include specific details of how accelerated erosion and sediment will be controlled within the "constricted" area of the river.

- To ensure public safety and to minimize destruction of habitat within the river, the structure must me properly inspected and maintained. Please provide this office with a detailed routine inspection and maintenance plan.

- Please provide this office with the name and location map of the authorized disposal site to include the haul route.

- All temporary fills must be completely removed and the affected area must be returned to pre-project elevations. Please provide this office with a detailed restoration plan for the project. This must include the areas where the cofferdam will be removed, the area in which the tar is removed (river bottom), as well as the river bank.

- The endangered Shortnose Sturgeon spawns during the months of February, March, and April. Please provide this office with a construction timeline that does not include any in-stream construction during these months to avoid potential impacts to the Sturgeon and other spawning fishes.

- In previous meetings there has been discussion about the possibility of historical properties in the area where the excavation is taking place. Please provide this office with correspondence you have had with the State Historic Preservation Office (SHPO) related to addressing any possible historic properties.

- Please provide a plan addressing public safety measures that will be implemented in and around the action area.

- Please provide a notification plan to keep the adjacent residents and local government informed of actions that may result in significant interruptions or disturbances while this project is underway.

- Please provide a traffic management plan to address the ingress and egress of equipment from the work area.

- In previous meetings there has been discussion about the possibility of unexploded ordinance within the work area. Please provide this office with a detailed plan on how the ordinance will be handled if encountered to ensure public safety.

- Related to the modeling data, the Corps has concerns that the model may not have adequately addressed how these cofferdams would affect river flow. Please contact our office to setup a technical meeting to discuss the model data and assumptions used.

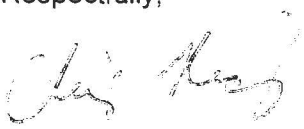
- In the event of cofferdam failure, please provide a remediation plan to address this failure.

- Based on the river elevations from the past three years the proposed cofferdams would have overtopped many times. Please provide information on how the proposed cofferdams would handle these overtopping events.

After reviewing the above referenced letters, you should provide me with your views, so that they can be given full consideration in the decision-making process. If no response is received by July 1, 2014, I will conclude that you have either elected not to actively pursue this application or have elected to pursue the requisite State authorizations and certifications prior to requesting a sequential final decision by this office. In either event, your application will be placed in an inactive status. However, our Project Manager will retain your application for one (1) year to facilitate reinstatement of processing upon your request.

If you have any questions concerning this matter, please contact Chip Ridgeway at 803-253-3906.

Respectfully,



Chip Ridgeway
Project Manager

Enclosures

From: Brown, Sara A SAC
To: Ridgeway, Irvin C (Chip) III SAC
Subject: RE: inundation maps (UNCLASSIFIED)
Date: Wednesday, September 17, 2014 8:12:00 AM

Classification: UNCLASSIFIED
Caveats: NONE

Usually the existing is shown, but with how fat they have drawn the lines we might not see a difference. but analysis has indicated a rise in water surface elevation - these maps show it is outside of the river into the river walk area as well as people's back yards. Thus the property owners should be contacted and made aware and asked for their concurrence/acknowledgement of the risk.

Do they have anything from NFIP coordinators? They do need a permit and we would want some level of assurance (letter, email) that they won't have a problem with getting a floodplain construction permit.

You don't usually have a drop in WSE when constricting the stream unless it went to supercritical flow- which has higher velocities and potential for scouring. I can't say for sure this is what happens but I don't know why else the WSE would drop rather than increase. RAS output would indicate this by Froude number dropping below 1. Also velocities increase, but since I don't have the output tables of RAS - only their report, I can't say for sure. I think this section of the river has rock bottom but not positive. To be safe, we might want some kind of assurance of restoration of river bed scouring due to the project. We might need to chat more on that.

-----Original Message-----
From: Ridgeway, Irvin C (Chip) III SAC
Sent: Wednesday, September 17, 2014 7:41 AM
To: Brown, Sara A SAC
Subject: FW: inundation maps (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Sara,

Is this what you are looking for?

-----Original Message-----
From: Rusty Contrael [mailto:Rcontrael@apexcos.com]
Sent: Tuesday, September 16, 2014 1:49 PM
To: Ridgeway, Irvin C (Chip) III SAC
Cc: rapple@scana.com
Subject: [EXTERNAL] RE: inundation maps (UNCLASSIFIED)

Hi Chip:

I hope things are going well for you.

Attached are the visuals that you requested. Hard copies are in the mail.

Please call or email with any questions.

Thanks, Rusty

Rusty Contrael
Principal
Apex Companies, LLC
MTR is now a subsidiary of Apex Companies, LLC

O) 412-829-9650

-----Original Message-----
From: Ridgeway, Irvin C (Chip) III SAC [mailto:Chip.Ridgeway@usace.army.mil]
Sent: Tuesday, September 09, 2014 8:45 AM
To: Rusty Contrael
Cc: APPLE, ROBERT M
Subject: inundation maps (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Rusty,

Sara e-mailed me last week asking if you all had prepared any inundation maps. Are there any sort of visuals showing the flooding?

Thanks,

Chip Ridgeway
Project Manager
U.S. Army Corps of Engineers-Charleston District Regulatory-Division Northwest Branch
803-253-3906

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

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Caveats: NONE