



February 7, 2019

Mr. Thomas Effinger
Southeast Energy Group (SEG)
Mail Code C-221
220 Operation Way
Cayce, SC 29033-3701

RE: Draft Conceptual Plan for a Modified Removal Action (dated 12/12/18)
SCE&G Fleet Maintenance Site (Congaree River)
Columbia, South Carolina

Dear Mr. Effinger:

The Department (DHEC) has reviewed the Modified Removal Action (MRA) approach presented in the Draft Conceptual Plan and agrees this plan should be considered the preferred path-forward on the Congaree River sediment remediation project being conducted under DHEC's Responsible Party Voluntary Cleanup Contract (VCC 02-4295-RP.) This approach would target for removal areas where tar like material (TLM) is most prevalent and poses the greatest risk to human exposure. The target areas are shown in the three figures attached. It also acknowledges that some TLM might remain in the riverbed but situated in areas that would pose very little future risk to human exposure.

DHEC has consulted with two primary stakeholders in this project - The Congaree Riverkeeper and Guignard Associates LLC - and they too have expressed their support of this modified Removal Plan (see attached supporting statements for the record from each attached).

The Department requests SCE&G carry this proposal forward and draft all the proper documents to achieve the necessary regulatory permits and approvals required for implementation. Additionally, understanding that this project is being conducted under DHEC's Responsible Party Voluntary Cleanup Contract (VCC 02-4295-RP), stakeholder involvement and public participation will occur through the entire project. DHEC and the stakeholders agree that this project should be accomplished by the most expeditious route possible in working with the U.S. Army Corps of Engineers.

Sincerely,

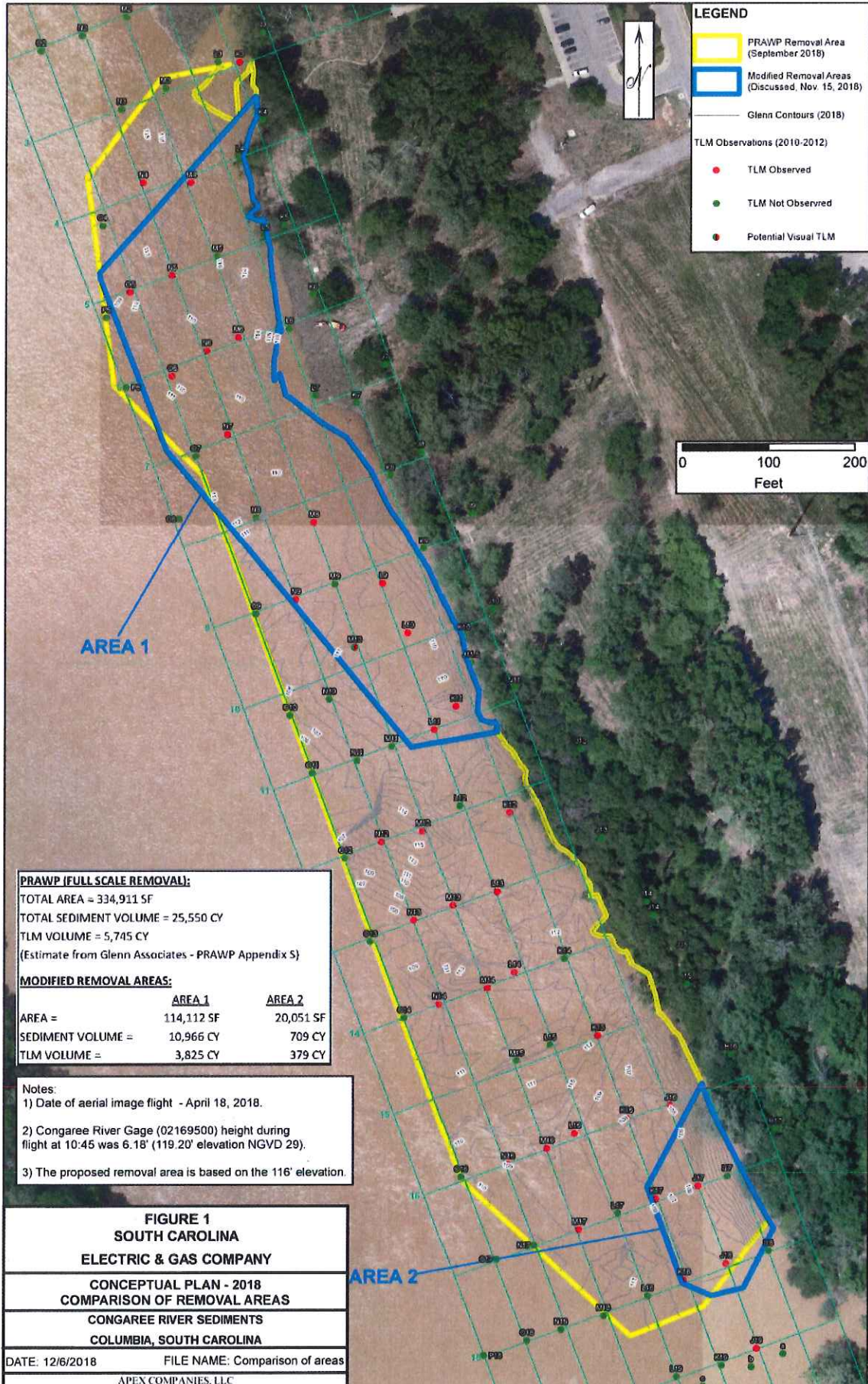
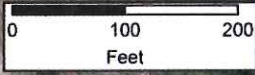
G. Kendall Taylor, Director
Division of Site Assessment, Remediation, and Revitalization
Bureau of Land and Waste Management

cc: File 52561
Myra C. Reese, EA Director
Veronica Barringer, Midlands EA Region
Bill Stangler, Congaree Riverkeeper
Charlie Thompson, Guignard Associates LLC

Figures

LEGEND

- PRAWP Removal Area (September 2018)
- Modified Removal Areas (Discussed, Nov. 15, 2018)
- Glenn Contours (2018)
- TLM Observed
- TLM Not Observed
- Potential Visual TLM



PRAWP (FULL SCALE REMOVAL):
 TOTAL AREA = 334,911 SF
 TOTAL SEDIMENT VOLUME = 25,550 CY
 TLM VOLUME = 5,745 CY
 (Estimate from Glenn Associates - PRAWP Appendix S)

MODIFIED REMOVAL AREAS:

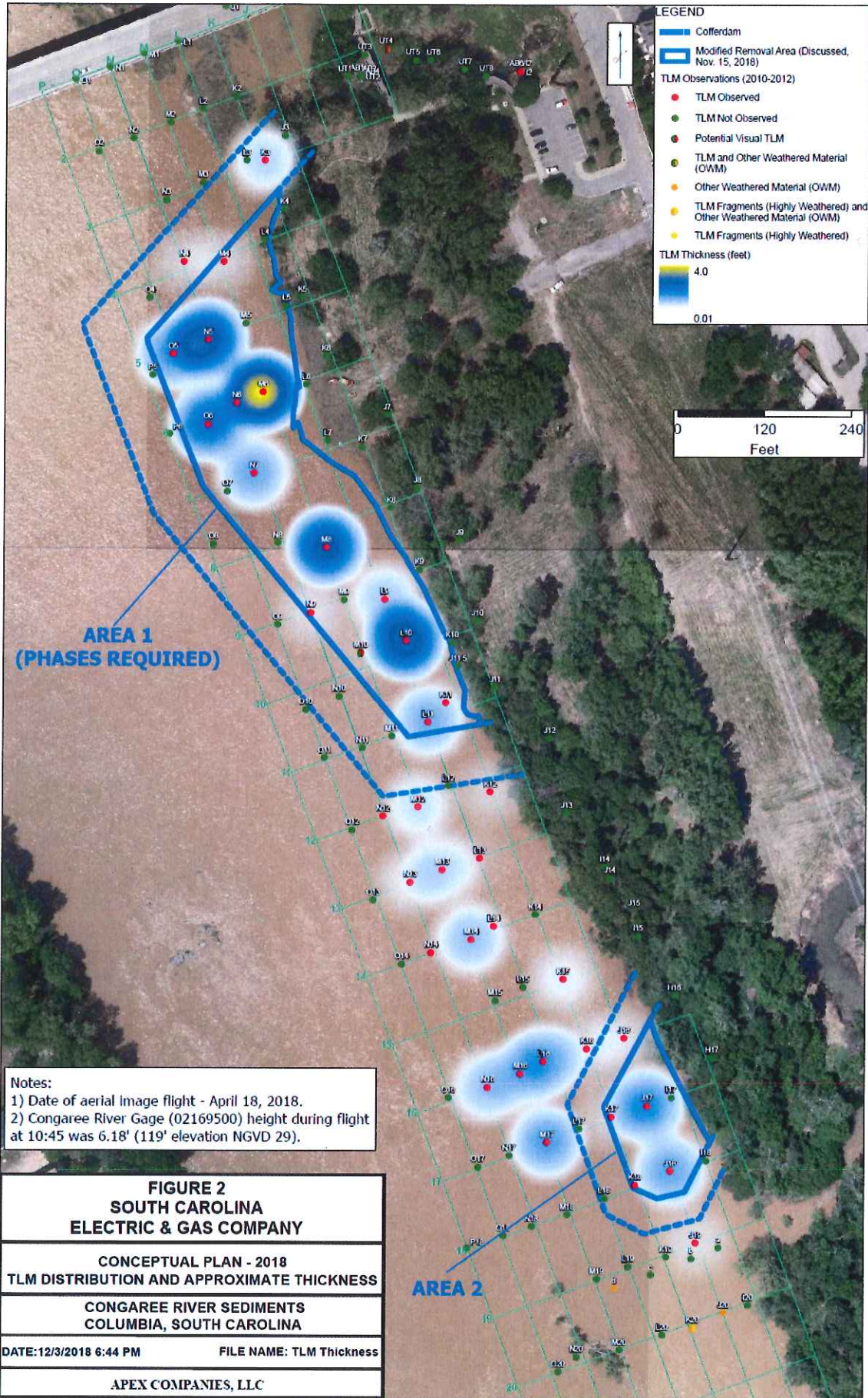
	AREA 1	AREA 2
AREA =	114,112 SF	20,051 SF
SEDIMENT VOLUME =	10,966 CY	709 CY
TLM VOLUME =	3,825 CY	379 CY

- Notes:**
- 1) Date of aerial image flight - April 18, 2018.
 - 2) Congaree River Gage (02169500) height during flight at 10:45 was 6.18' (119.20' elevation NGVD 29).
 - 3) The proposed removal area is based on the 116' elevation.

FIGURE 1
SOUTH CAROLINA
ELECTRIC & GAS COMPANY

CONCEPTUAL PLAN - 2018
COMPARISON OF REMOVAL AREAS
CONGAREE RIVER SEDIMENTS
COLUMBIA, SOUTH CAROLINA

DATE: 12/6/2018 FILE NAME: Comparison of areas
 APEX COMPANIES, LLC



LEGEND

- ▬ Cofferdam
- Modified Removal Area (Discussed, Nov. 15, 2018)
- TLM Observations (2010-2012)**
 - TLM Observed
 - TLM Not Observed
 - Potential Visual TLM
 - TLM and Other Weathered Material (OWM)
 - Other Weathered Material (OWM)
 - TLM Fragments (Highly Weathered) and Other Weathered Material (OWM)
 - TLM Fragments (Highly Weathered)
- TLM Thickness (feet)**

0 120 240
Feet

**AREA 1
(PHASES REQUIRED)**

AREA 2

Notes:
 1) Date of aerial image flight - April 18, 2018.
 2) Congaree River Gage (02169500) height during flight at 10:45 was 6.18' (119' elevation NGVD 29).

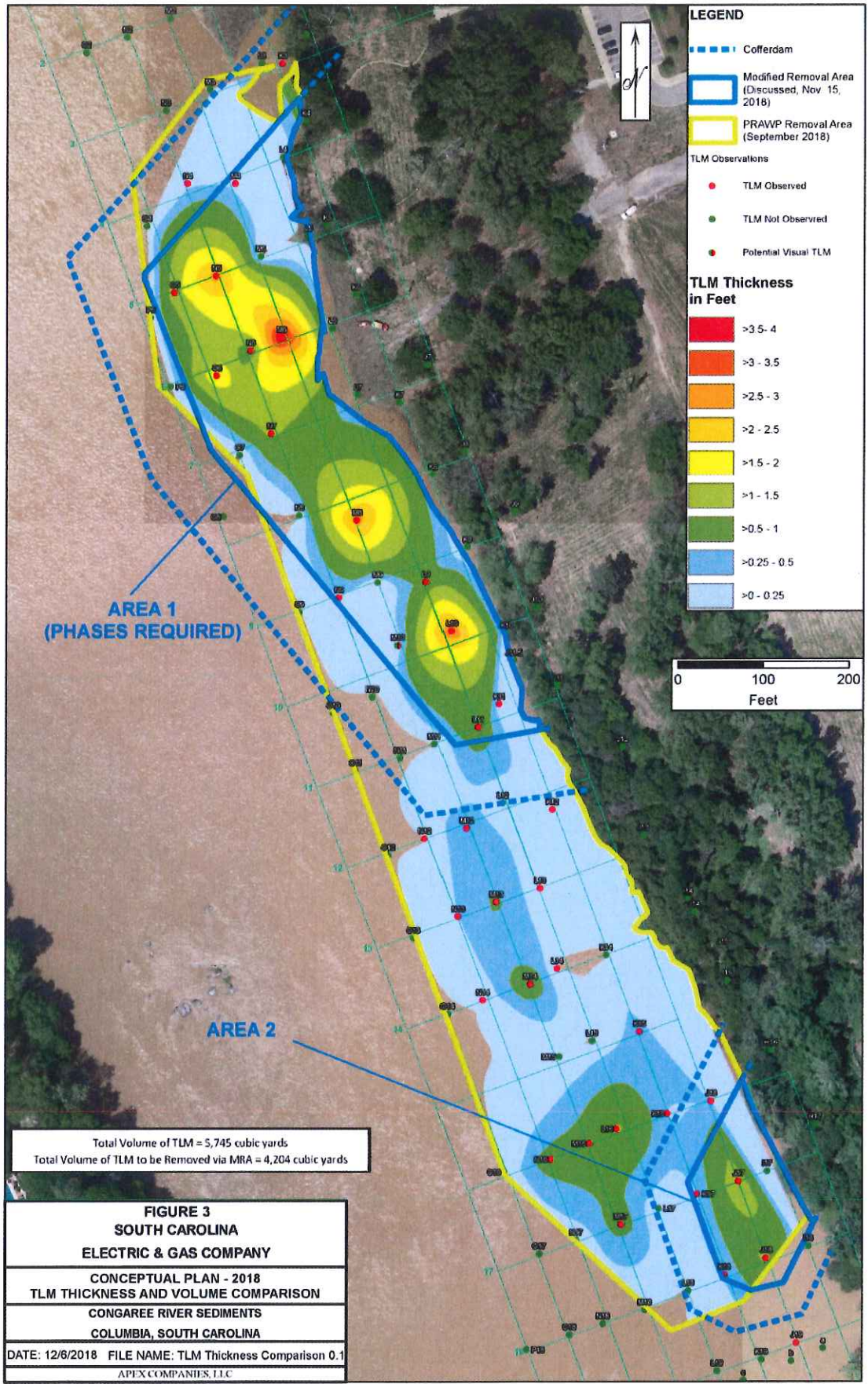
**FIGURE 2
SOUTH CAROLINA
ELECTRIC & GAS COMPANY**

CONCEPTUAL PLAN - 2018
 TLM DISTRIBUTION AND APPROXIMATE THICKNESS

CONGAREE RIVER SEDIMENTS
 COLUMBIA, SOUTH CAROLINA

DATE: 12/3/2018 6:44 PM FILE NAME: TLM Thickness

APEX COMPANIES, LLC



Declaration of Support by Stakeholders:

- 1) Congaree Riverkeeper endorses the modified removal action presented by SCE&G and described above, with the understanding that SCE&G will work diligently and make all reasonable efforts to acquire the necessary permits and complete this proposed removal action, and SCE&G will provide stakeholders with regular updates on their progress. We are also committed to supporting the permitting strategy the Corps determines is most appropriate for the Modified Removal Action, provided that the permit authorization process is as expeditious as possible while still affording sufficient opportunity -- either within the permitting process or through the parallel voluntary cleanup contract led by DHEC -- for public comment and for agency consultation.

William J. Stangler (e-signature, 1/23/19)

Bill Stangler
Congaree Riverkeeper

Declaration of Support by Stakeholders:

1. That any such plan and associated application be submitted to the USACE for authorization under the appropriate Nationwide permit, e.g., NWP-38, and not under an Individual permit, to expedite the process and help mitigate the total project timeline.



Charles C. Thompson, Manager
Guignard Associates LLC