

Notification of Intent to Initiate Closure

§257.107(i) Closure and Post-Closure Care
Gypsum Filtrate Pond
Clean Closure of a Surface Impoundment

Cross Generating Station
Cross, South Carolina

Prepared by



CCP and Waste Management
March 10, 2016

NARRATIVE DESCRIPTION OF CLOSURE

The Gypsum Filtrate Pond at Cross Generating Station (CGS) is subject to 40 CFR Part 257 Subpart D entitled "Disposal of Coal Combustion Residuals", effective on October 19, 2015 and is hereafter referred to as the CCR Rule or Rule. The Gypsum Filtrate Pond at CGS must also comply with State Regulations including requirements of the NPDES Permit No. SC0037401. Under the CCR Rule, the Gypsum Filtrate pond was active before and after the effective date of the CCR Rule and was idled in December, 2015 pending a State approved closure process.

The Gypsum Filtrate Pond is located along the eastern boundary of CGS and has a surface area of approximately 1 acre. The surface impoundment was commissioned in 1983 with an engineered perimeter dike approximately 6 feet high from the outside toe. The estimated maximum inventory of CCR ever in the surface impoundment at any time over its active life was approximately 9,000 cubic yards (CY) with an average CCR depth of approximately 6 feet. Assuming an average of 22 working days per month and two months for excavation activities, the required rate of removal is in the order of 205 cy per day. This removal rate allows time to complete closure prior to October 15, 2016.

Closure of the Gypsum Filtrate Pond will be initiated according to a State of South Carolina (SC DHEC) approved Closure Plan. That Closure Plan has no bearing on this document, and this NOI is not reflected in the State Closure Plan. Closure drawings were prepared by Worley Parsons Group Inc. and the closure plan was prepared by Santee Cooper.

The excavated CCR material from the Unit 2 Slurry Pond will be beneficially used or disposed consistent with applicable state regulations. After CCR is removed from the pond, verification sampling will be performed. The dike will be removed and clean fill may be placed in phases, following confirmation of adequate removal of CCR, to allow for gravity drainage from the pond. The placement of clean fill is not required for closure under the CCR Rule and therefore not considered part of this notification. Data from the verification sampling will form the basis of the Notification of Completion which will be placed in the operating record within 60 days of closure. After closure is complete, the existing berms and pond area will be regraded to promote stormwater runoff and allow for future industrial use.

SCHEDULE FOR COMPLETING CLOSURE ACTIVITIES

According to §257.102(c) closure by removal of CCR and decontamination is complete when constituent concentrations have been removed and groundwater monitoring concentrations do not exceed groundwater protection standards. Closure activities will commence according to §257.102(e) and when SC DHEC approvals are in place. Based on the current closure schedule,

removal of all CCR is expected to be completed in July, 2016 and final grading is expected to be completed prior to October 17, 2016 which is in compliance with §257.102(f)(1)(ii).

CERTIFICATION

Given the information provided above, the closure drawings prepared by Worley Parsons, and knowledge of site conditions, it is the professional opinion of Santee Cooper that the written closure plan meets the requirements of §257.102(b).



3/10/16

Denise Bunte-Bisnett, P.E.

Principal Engineer

CCP and Waste Management

Santee Cooper

SC P.E. # 18485



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