

Notice of Remaining in Detection Monitoring Cross Generating Station, Class 3 Landfill

The South Carolina Public Service Authority (Santee Cooper) is implementing the April 17, 2015 U.S. Environmental Protection Agency (U.S. EPA) Federal Coal Combustion Residuals (CCR) Rule (40 CFR § 257 and 261) for the Cross Generating Station, located in Berkeley County, South Carolina.

Pursuant to 40 CFR §257.94(e)(2), *The owner or operator may demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.* The CCR Rule provides 90-days from detecting a statistically significant increase over background to complete an Alternate Source Demonstration (ASD). If a successful demonstration is completed, and certified by a qualified professional engineer, the CCR unit may continue with detection monitoring (§257.94(e)(2)). If, however, an alternate source of any of the Appendix III SSI is not identified the owner or operator must, within 90-days, initiate an assessment monitoring program (§257.94(e)(3)).

Haley & Aldrich conducted an evaluation of groundwater quality at the Class 3 Landfill to identify alternate sources for the Appendix III SSIs observed downgradient of the unit. The evaluation included review of sampling procedures, laboratory procedures, and statistical analyses to determine if potential errors may have been made that could result in the apparent SSIs observed downgradient of the Class 3 Landfill. Haley & Aldrich also evaluated potential point and non-point sources of contamination in the vicinity and evaluated natural geologic conditions and the effect of those conditions on native groundwater chemistry.

At this time, this review identified the Class 2 Landfill as the contributing source that serves as an ASD for the SSI's observed in the CCR well network for the Class 3 Landfill. The Class 2 Landfill impacted the groundwater in the area prior to construction of the Class 3 Landfill. The Class 2 Landfill has been closed and capped and is currently in assessment monitoring.

Consistent with § 257.94(e)(2), the Class 3 Landfill will remain in detection monitoring.