

*Prepared for*  
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# **NOTIFICATION OF INTENT TO INITIATE CLOSURE**

## **§257.107 (i) CLOSURE AND POST-CLOSURE CARE UNIT 2 SLURRY POND – INACTIVE CCR SURFACE IMPOUNDMENT**

**Winyah Generating Station  
Georgetown, South Carolina**

*Prepared by*

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## **NARRATIVE DESCRIPTION OF CLOSURE**

The Unit 2 Slurry Pond at Winyah Generating Station (WGS) is subject to 40 CFR Part 257 Subpart D entitled “Disposal of Coal Combustion Residuals”, which became effective on October 19, 2015 and is hereafter is referred to as the CCR Rule or Rule. The Unit 2 Slurry Pond at WGS is subject to the federal CCR Rule and must, in parallel, comply with State Regulations including the requirements of NPDES Permit No. SC0022471. Under the Rule, the Unit 2 Slurry Pond is considered an inactive CCR surface impoundment and is closing under the requirements of paragraph (b)(5) of section §257.100, removal of CCR.

The Unit 2 Slurry Pond is located in the northeast portion of the WGS and has a surface area of approximately 32 acres. The surface impoundment was commissioned in 1977 with an engineered perimeter dike approximately 8 to 15 feet high from the outside toe. As of October 1, 2015, the estimated volume of CCRs in the surface impoundment was approximately 100,000 cubic yards (CY) with an average CCR depth of approximately 7 feet. Assuming an average of 22 working days per month and 22 months for excavation activities, the required rate of removal is in the order of 210 cy per day. This removal rate provides adequate time to complete the closure prior to the April 17, 2018 deadline.

Closure of the Unit 2 Slurry Pond was initiated according to a State of South Carolina (SC DHEC) approved Closure Plan prior to the effective date of the CCR Rule. That Closure Plan has no bearing on this document, and this NOI does not reflect a modification to the State Closure Plan.

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. Clean fill may be placed in phases, following confirmation of adequate removal of CCR, to allow for gravity drainage from the pond. While the placement of clean fill may be performed in parallel with CCR removal in other portions of the pond, the placement of clean fill is not required for closure under the CCR Rule and therefore not considered part of the closure process. 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 §257.100 (b)(5), closure by removal of CCR is complete when all of the CCR has been removed. The removal of all the CCR is expected to be completed prior to April 17, 2018. Santee Cooper will comply with the progress reports as outlined in §257.100 (c)(2). Based on the current closure schedule, the first annual progress report is due no later than January 17, 2017.

### **CERTIFICATION**

Given the information provided above and our knowledge of site conditions, it is the professional opinion of Geosyntec that the closure described above is technically feasible and can be completed prior to April 17, 2018.



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