# Winyah Generating Station Revised Closure Plan for South Ash Pond

PREPARED BY SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER)

October 10, 2025

# Winyah Generating Station Revised Closure Plan for South Ash Pond | 10/10/2025

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### **REVISION COPY & CONTROL**

Document Revision No.	Revision Date	Revision Notes
1	10/10/2025	Revised Closure Plan to conduct dike breaching, dike leveling, pond filling and grading after the NPDES pond closure inspection to facilitate construction schedule. Edited/revised plan to meet both Federal CCR Rule and South Carolina DES requirements for closure (including an estimate of the historical maximum inventory of CCR in the South Ash Pond and a certification from a registered Professional Engineer); revised the schedule; and made other minor corrections and updates.

# 1 Introduction

# 1.1 Purpose

The Winyah Generating Station Revised Closure Plan for South Ash Pond (hereafter, referred to as the "Revised Closure Plan") outlines the process and schedule for the timely and successful closure by removal of the now inactive Winyah Generating Station (WGS) South Ash Pond. The Revised Closure Plan was prepared pursuant to both South Carolina State and Federal coal combustion residual (CCR)-related regulatory requirements, specifically the Federal CCR Rule Title 40 Code of Federal Regulations (40 CFR) § 257.102(b) and South Carolina Department of Environmental Services (SCDES) Regulation SC R.61-82 (Proper Closeout of Wastewater Treatment Facilities).

The intent of this Revised Closure Plan is to supersede prior closure plans provided for WGS and the South Ash Pond, including the State Closure Plan approved by SCDES on August 18, 2025. For future Santee Cooper impoundment closure plans, it is Santee Cooper's aim to integrate best practices and learned outcomes using an adaptive management approach from the South Ash Pond closure strategy.

# 1.2 Site Overview

Santee Cooper owns and operates WGS located in Georgetown County, South Carolina (Figure 1). WGS operates four coal-fired units that collectively generate 1,130 megawatts of electricity. The first unit began commercial operation in 1975, and the other three units came online in 1977, 1980, and 1981. WGS generates CCRs during power generation and air quality control process operations. Historically, CCRs were managed in six on-site surface impoundments and more recently, in the on-site Class 3 industrial solid waste landfills. In April 2020, a State Closure Plan for Ash Pond A, Ash Pond B & South Ash Pond (State Plan) was submitted to SCDHEC (known as SCDES since July 1, 2024). On August 18, 2025, the Winyah Generating Station Closure Plan for South Ash Pond (State Closure Plan), a plan specific to the South Ash Pond, was submitted to and approved by SCDES. This Revised Closure Plan supersedes the State Plan and previously approved State Closure Plan.

The South Ash Pond is an approximately 75-acre, unlined CCR surface impoundment which had historically received fly ash, bottom ash, low volume wastewater, and industrial stormwater in accordance with WGS facility National Pollutant Discharge Elimination System (NPDES) Permit No. SC0022471. The maximum inventory of CCR ever on-site over the active life of the South Ash Pond is estimated to be 2,312,596 cubic yards (2,775,115 tons). Historically, the South Ash Pond contained CCR and treated process industrial wastewater and stormwater by removing solids through gravity settling prior to discharge through an internal outfall into the Industrial Cooling Pond by way of the discharge canal. As of April 11, 2021, CCR and CCR wastewater no longer entered the South Ash Pond. As there are no industrial wastewater inflows into the pond, only decanted legacy wastewater and stormwater are currently discharged through a riser structure to the discharge canal and/or to the Low Volume Waste Pond. The South Ash Pond dikes were constructed from silty sands and clayey sands cast up from borrow pits within the pond bottom footprint (Dike Construction Drawing – Appendix 1). Ash was not used to construct the dikes.

The South Ash Pond is regulated under the 2015 Federal CCR Rule and the WGS facility NPDES Permit. Groundwater monitoring of the South Ash Pond has been ongoing from the 1990's to present day under the State-issued WGS NPDES Facility permit with State groundwater monitoring reports submitted to SCDES. Additionally, the South Ash Pond has been regulated since 2015 in accordance with the Federal CCR Rule with annual reports available on Santee Cooper's public CCR Rule website since the initial report was published in 2018. In accordance with the Federal CCR Rule 40 CFR § 257.95, the South Ash Pond is currently in assessment monitoring. Throughout assessment monitoring of the South Ash Pond, there have been no statistically significant levels above the groundwater protection standard for any of the monitored groundwater constituents.

The South Ash Pond ceased receipt of all CCR waste and wastewater as of April 11, 2021, and closure by removal through excavation of ponded CCR and subsurface soils has been an ongoing operation.

Geosyntec Consultants (Geosyntec) prepared the initial Federal CCR Rule Closure Plan Narrative South Ash Pond Winyah Generating Station in October 2016 in accordance with the CCR Rule §257.102(b)(1). The Federal CCR Rule Closure Plan was updated by Santee Cooper in December 2022 to incorporate changes in site conditions and update the closure schedule and is available on Santee Cooper's public CCR Rule website. This Revised Closure Plan includes all information required for closure under the Federal CCR Rule and State closure requirements and will be posted on Santee Cooper's public CCR Rule website upon approval by SCDES.

# 2 Geology and Hydrogeology

# **Regional Geology**

Georgetown County is in the Atlantic Coastal Plain physiographic province, which is characterized by Quaternary terrace deposits produced by fluctuating sea levels. Coastal plain sediments are underlain by Tertiary and late Cretaceous sediments to a depth of approximately 2,200 feet below ground surface (bgs) in the Georgetown area. Descriptions of geologic units of interest in the area were provided in a paper by

Campbell and Coes, 2010. The thickness of each unit was estimated based on information from several borings referenced in Campbell and Coes (2010). Specifically, these borings include: 1) CHN-0820, which is located approximately 12 miles to the south of WGS, 2) GEO-0088, which is located approximately 7 miles to the southeast of WGS, and 3) GEO-0185, which is located less than 1.5 miles to the northwest of WGS.

General information about the regional geologic units is summarized below, from most recent to oldest:

- Undifferentiated Quaternary Sediments: This geologic unit consists of yellowish-brown and reddish orange poorly sorted, very fine to very coarse, clayey sand and gravel. Accessory minerals include opaque heavy minerals, mica, and feldspar. The Undifferentiated Quaternary sediments thickness ranges between 20 and 42 feet in the area.
- The Williamsburg Formation (Williamsburg): This geologic unit consists of gray to black interbedded clay and coarse quartz sand overlying shelly clay and calcareous clay. The Williamsburg can include sandy shale, fuller's earth, fossiliferous clayey sand (Lower Bridge Member), and fossiliferous clayey sand and mollusk-rich, bioclastic limestones (Chicora Member). The thickness of the Williamsburg in the vicinity of the site ranges between 30 and 90 feet.
- The Lang Syne Formation: As described in the literature by Muthig and Colquboun (1988), this
  geologic unit consists of red and yellow (where weathered) or white, gray, and black (where freshly
  exposed) interbedded sand, silt, and clay and thin beds of silicified shell debris. Opaline clay stone is
  the most characteristic lithology of the Lang Syne Formation.
- The Rhems Formation: This geologic unit consists of light gray to black shale interlaminated with thin seams of fine-grained sand and mica.
- The Peedee Formation: This geologic unit consists of a dark green to gray, fossiliferous, glauconitic clayey sand and silt. The combined thickness of the Lang Syne, Rhems, and Peedee Formations ranges between 185 and 378 feet in the vicinity of WGS.

Additional late Cretaceous Formations are present to a depth of approximately 2,200 feet bgs in the area. These formations, in descending order, include: Donoho Creek, Bladen, Coachman, Cane Acre, Caddin, Sheppard Grove, Pleasant Creek, Cape Fear and undifferentiated Cretaceous sediments.

# **Foundation Soils**

Soil test borings and Cone Penetrometer Test soundings (Geosyntec, 2016a) within the vicinity of the South Ash Pond perimeter dikes were evaluated. Foundation materials were observed to be variable across the South Ash Pond's footprint but consisted primarily of poorly graded to silty sands with shells and pockets of clayey sand to high plasticity clay. A 15- to 20-foot layer of soft clay was observed in the west to southwest corner of the surface impoundment. In isolated areas, the foundation materials were relatively poorly graded clean sands (less than 10 percent [%] fines). The poorly graded and silty sands were composed typically of 60% to 90% sand sized material with 15% to 25% fines (Geosyntec, 2016a). Some samples described historically as "shell hash" contained predominantly shells and fine gravel (Geosyntec, 2016a).

# Site Hydrogeology

The aquifers of most interest at this site are the surficial aquifer and Gordon Aquifer. The surficial aquifer is the water table aquifer and consists mainly of terrace sediments that were deposited during transgressions and regressions of a post-Miocene Sea. The surficial aquifer is lithologically heterogeneous but generally consists of quartz gravel and sand, silt, clay, and shelly sand and unconformably overlies the Gordon aquifer, which is the lowermost aquifer of the Floridan Aquifer system. The Gordon Aquifer represents the permeable portion of the Williamsburg Formation (upper Chicora Member) in the vicinity of the site. As detailed in the Site Hydrogeologic Characterization Study Report (Geosyntec, 2016b), the surficial aquifer and Gordon Aquifer exhibit similar hydrogeologic properties and are not separated hydrogeologically. Therefore, the Gordon Aquifer and surficial aquifer are collectively termed the surficial aquifer (Geosyntec, 2016b). Historical groundwater elevation measurements in the surficial aquifer at the site were influenced by the water levels (i.e., hydraulic head) in the slurry ponds and ash ponds. In recent years, Class 3 Landfills Area 1 and Area 2 have been constructed over former impoundments, Unit 2 Slurry Pond and Ash Pond A, respectively. The landfills have been constructed with impermeable liners that will prevent recharge in these areas. Also, once the remaining ponds are dewatered and closed, the effect of the ponds as significant sources of recharge to the water table and thus locally influencing groundwater flow direction will be virtually eliminated.

# 3 Closure by Removal Sequencing

# **Closure By Removal Approach**

The methodology of closure by removal is being implemented to meet the Federal and State closure requirements. As of March 2025, all visual CCRs from the South Ash Pond have been either beneficially used or disposed of in the adjacent on-site Class 3 Landfills. WGS converted to dry bottom ash and fly ash handling in 2018 and all CCR and wastewaters were no longer sluiced to the South Ash Pond as of April 11, 2021.

The general procedure for CCR removal and South Ash Pond closure and post-closure activities is described as follows:

- All CCR and wastewater streams previously pumped to the South Ash Pond were either converted to dry ash handling, re-routed, or eliminated by April 11, 2021.
- 2. The South Ash Pond was decanted, and will continue to be decanted, throughout the closure process by a series of variable internal drainage ditches and sock drains within the pond to direct the legacy wastewater and stormwater towards the South Ash Pond outfall. The legacy wastewater and stormwater are then pumped to the Industrial Cooling Pond via the discharge canal and/or the Low Volume Waste Pond. Continual decanting operations are anticipated throughout the duration of closure to minimize the amount of free water present within the CCR impoundment to maintain conditions suitable for excavation. To date, the need for installation of dewatering wells has not been required. Thus, time frames for associated permitting and installation of dewatering wells are not

- included in this Revised Closure Plan or schedule. If necessary for further dewatering or water treatment, dewatering wells, total suspended solids (TSS) filter systems, and/or wastewater treatment systems will be permitted and employed.
- 3. The CCRs and subsurface soils were, and will be, dewatered further within the South Ash Pond using stacking and gravity decanting to remove free water until the material can pass United States Environmental Protection Agency (EPA) Method 9095B (paint filter test). All CCR waste and subsurface soil that will be hauled to the on-site Class 3 Landfill or other permitted landfill must first pass this test.
- 4. All visual CCR material was excavated using conventional equipment (e.g., track hoes). Prior to the start of CCR excavation, the base grades of the WGS CCR ponds were estimated by Geosyntec as detailed in the Winyah Pond Bottom Estimate Memorandum from June 6, 2014 (Appendix 2). CCR material intended for beneficial use was excavated and placed in temporary storage piles within the confines of the South Ash Pond. The material was then loaded either in semi-trucks or train cars via an adjacent railway for transportation. All ash transported from the station was covered to prevent discharge. The CCR material was weighed and recorded on certified scales prior to leaving the station. CCR material that was not beneficially used due to customer demand, material quality, or regulatory time constraints was landfilled by placement in off-road trucks and hauled to and compacted in the on-site Class 3 Landfills.
- 5. Upon removal of all visual CCRs from the pond, a topographic survey of the footprint was conducted by licensed surveyors to document the pond bottom elevations (Figure 2).
- 6. A minimum of 6 inches of subsurface soil will be excavated and removed from the pond footprint, including to the top of the inside slope of the dike. CCR removal will be verified through microscopy and subsurface soil will be analyzed for informational purposes as detailed in the Pond Base Verification Soil Sampling section below. CCR removal verification and soil analysis may be performed in phases to facilitate construction and/or water management, as necessary.
- 7. To verify site elevations after subsurface soil removal, a topographic survey of the footprint will be performed by licensed surveyors and submitted to SCDES. This survey may be performed in phases to facilitate construction and/or water management, as necessary.
- 8. After the CCR and subsurface soil have been removed, Santee Cooper will obtain SCDES closure pursuant to South Carolina Regulation R.61-82 (Proper Closeout of Wastewater Treatment Facilities). Santee Cooper will certify closure is complete under the Federal CCR Rule requirements. The post-closure activities detailed in this document, including groundwater monitoring, will continue for the constituents cited in the NPDES permit until all SCDES requirements are met. Section 5 of this Revised Closure Plan contains additional groundwater monitoring details.
- 9. After closure is approved and certified, portions of the pond dikes will be utilized to partially fill the pond excavation areas beneath the future General Electric (GE) LM6000 turbines' concrete pads and to provide positive drainage. Additional fill material, sourced from on-site borrow pits or imported

from off-site locations, may be utilized as needed and compacted within the pond to raise the overall grade. A stormwater detention pond(s) may be located within a portion of the closed pond footprint in order to attenuate stormwater runoff to existing levels after closure is complete. The area will be graded as required to provide positive drainage and to allow maintenance access and will be permanently seeded. Fill soil requirements are detailed in the Fill Soil Qualification Sampling section below.

10. The pond dike will be breached. Erosion and sediment controls will be installed where required to ensure non-contact construction stormwater is controlled in a manner to prevent erosion and sedimentation in areas surrounding the pond. Appropriate stormwater construction and other water permits will be obtained or modified as needed prior to breaching the dike or disturbing areas outside the limits of the South Ash Pond

# Pond Base Verification Soil Sampling

Any need for additional soil removal beyond the minimum of 6 inches will be determined by visual methods and confirmed using microscopy for soil decontamination. Microscopy will be performed by a degreed professional with experience in microscopic analysis and certified under the supervision of a third-party qualified professional engineer. One core sample per acre will be collected throughout the pond bottom and interior dikes to a depth of 12 inches using a decontaminated stainless steel hand auger to verify no observations of residual ash by a third-party laboratory through microscopic observation of fly ash cenospheres. If cenospheres are present after collection and analysis of a confirmation sample, a second confirmatory sample will be obtained and delineation samples will be collected vertically 6 inches below the confirmatory sample and laterally 25 feet in four directions from the original sample. Additional soil will be removed in this area as necessary until no cenospheres are detected. This sampling and verification may be performed in phases to facilitate construction and/or water management, as necessary.

To further assess baseline information after excavation is completed, a minimum of 1 out of every 10 confirmation samples from the pond bottom that are submitted for visual analysis will be analyzed for antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium using EPA Methods 6020B, 7471B, 9056A, and 6010D for a total of 8 samples for the South Ash Pond. These confirmation samples will be collected and evaluated in consideration of the post-closure long-term monitoring and stewardship requirements of the site. Pond closure and post-closure activities, including dike breaching and removal, may continue while these samples are being analyzed, and the sampling and analysis may be performed in phases to facilitate construction and/or water management, as necessary.

# Fill Soil Qualification Sampling

As noted above, the pond dike material will be used to partially fill the pond excavation areas. As shown in the Dike Construction Drawing provided in Appendix 1, the South Ash Pond dikes were constructed using native soil from the base of the pond excavation. The dikes were used as haul roads while the South Ash Pond was in use. The intended reuse of this soil will primarily be beneath the future GE LM6000 turbines' concrete

pads. Santee Cooper will collect one soil sample approximately every 500 linear feet to a depth of 12 inches for confirmation of ash removal along the haul road at the top of the dikes using a decontaminated stainless steel hand auger. The soil sample will be analyzed using the same microscopy methodology described above. In addition, samples will be collected from the interior and exterior dike walls approximately every 500 linear feet near the bottom, mid-point, and top of the dike. These dike soil samples will be collected at a depth of 6 to 12 inches and 36 to 42 inches, for a total of 12 samples every 500 linear feet, and composited for analysis of antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium using EPA Methods 6020B, 7471B, 9056A, and 6010D. Laboratory analyses will be conducted by a South Carolina-certified laboratory under standard chain-of-custody procedures. These confirmation samples will be collected and evaluated in consideration of the post-closure long-term monitoring and stewardship requirements of the site. Pond closure and post-closure activities, including dike breaching and removal, may continue while these samples are being analyzed, and the sampling and analysis may be performed in phases to facilitate construction and/or water management, as necessary.

Any fill material imported from off-site locations will be sampled for analysis of antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium using EPA Methods 6020B, 7471B, 9056A, and 6010D. Results will be submitted to SCDES for approval prior to bringing soils on-site.

# 4 Schedule

The schedule for completing all activities required to close the South Ash Pond are detailed below. These dates are approximate and provided to convey the overall sequence and scope of closure activities and to demonstrate their approximate duration. Activities may commence and/or complete earlier or later than shown.

Activity	Anticipated Schedule
Intensification of decanting (increased pumping) and dewatering activities (installation of sock drain)	April 2021 (Completed)
Final receipt of CCR	Apr 11, 2021 (completed)
CCR removal for beneficial use and landfill disposal	April 2021 — March 2025 (completed)
Submit South Ash Pond State Closure Plan to SCDES for approval	August 2025 (completed)

Obtain SCDES approval for State Closure Plan	August 2025 (completed)
Submit Revised Closure Plan to SCDES for approval	September 2025
Obtain SCDES approval for Revised Closure Plan	October 2025
Completion of physical closure by removal for South Ash Pond	October 2025
Conduct SCDES site inspection and obtain SCDES approval of pond closure	October 2025
Post a closure completion notification to the Santee Cooper public CCR Rule website	October 2025
Post-Closure Activities for South Ash Pond (dike leveling, grading and construction, dike breaching, groundwater monitoring, etc)	October 2025 – TBD

# 5 Post-Closure Activities

Post-closure activities include dike leveling, grading and construction, dike breaching, and groundwater monitoring. Groundwater monitoring associated with the South Ash Pond is currently and will continue to be performed in accordance with the facility NPDES permit and the Federal CCR Rule Groundwater Monitoring Plan. Monitoring well locations are noted on Figure 3. The South Ash Pond is currently in assessment monitoring on a semiannual schedule for Appendix IV constituents and is currently meeting Groundwater Protection Standards under the CCR Rule. Once the South Ash Pond is closed and certified closed pursuant to the CCR Rule, groundwater monitoring under the CCR Rule is no longer required. At that time, Santee Cooper will limit future groundwater monitoring to constituents cited in the NPDES permit or otherwise deemed necessary by SCDES until all SCDES requirements are met.

# 6 References

- Campbell, B.G., and Coes, A.L., eds., 2010. Groundwater availability in the Atlantic Coastal Plain of North and South Carolina: U.S. Geological Survey Professional Paper 1773.
- 2. Muthig, M.G., and Colquhoun, D.J., 1988. Formal recognition of two members within the Rhems Formation in Calhoun County, South Carolina: South Carolina Geology v. 32, nos. 1-2.

- Geosyntec Consultants, June 2014. Memorandum Pond Bottom Estimate, Winyah Generating Station. Georgetown, South Carolina.
- 4. Geosyntec Consultants, October 2016a. Closure Plan Narrative South Ash Pond Winyah Generating Station, Georgetown, South Carolina.
- 5. Geosyntec Consultants, October 2016b. History of Construction Report South Ash Pond, Winyah Generation Station.
- 6. Santee Cooper, September 2020a. Winyah Generating Station Ash Ponds South Ash Pond Bottom of Ash Surface.
- 7. Santee Cooper, September 2020b. Winyah Generating Station Ash Ponds South Ash Pond Post-Soil Removal Surface.
- 8. South Carolina Department of Health and Environmental Control, May 2024. National Pollutant Discharge Elimination System Permit Permit No. SC0022471.
- 9. South Carolina Public Service Authority (Santee Cooper), May 2021. Winyah Generating Station State Closure Plan for Slurry Pond 3 & 4.
- 10. South Carolina Public Service Authority (Santee Cooper), May 2023. Winyah Generating Station State Closure Plan for Ash Pond A Outside Landfill Addendum.

# 7 Certification

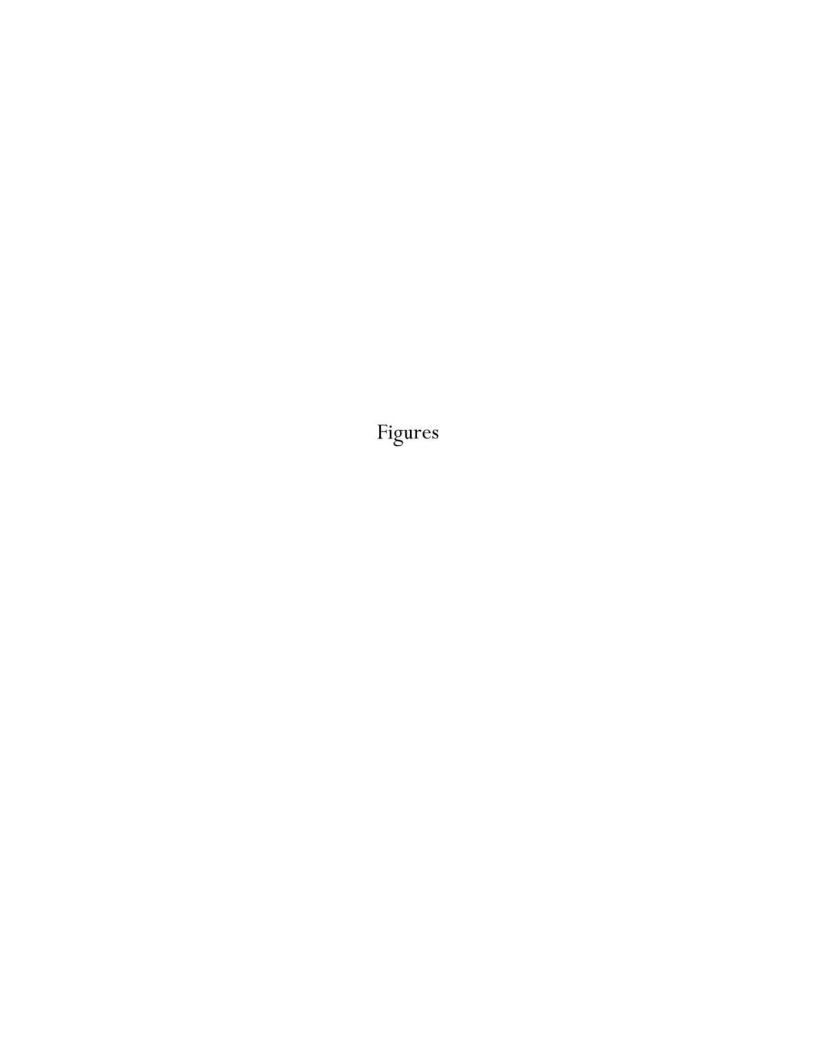
I, Brian H. Holmes, being a registered Professional Engineer in the State of South Carolina, do hereby certify to the best of my knowledge, information, and belief that the information contained in this Winyah Generating Station Revised Closure Plan for South Ash Pond dated October 10, 2025 was developed pursuant to the requirements of 40 CFR 257.102 and has been prepared with recognized and generally accepted good engineering practices.

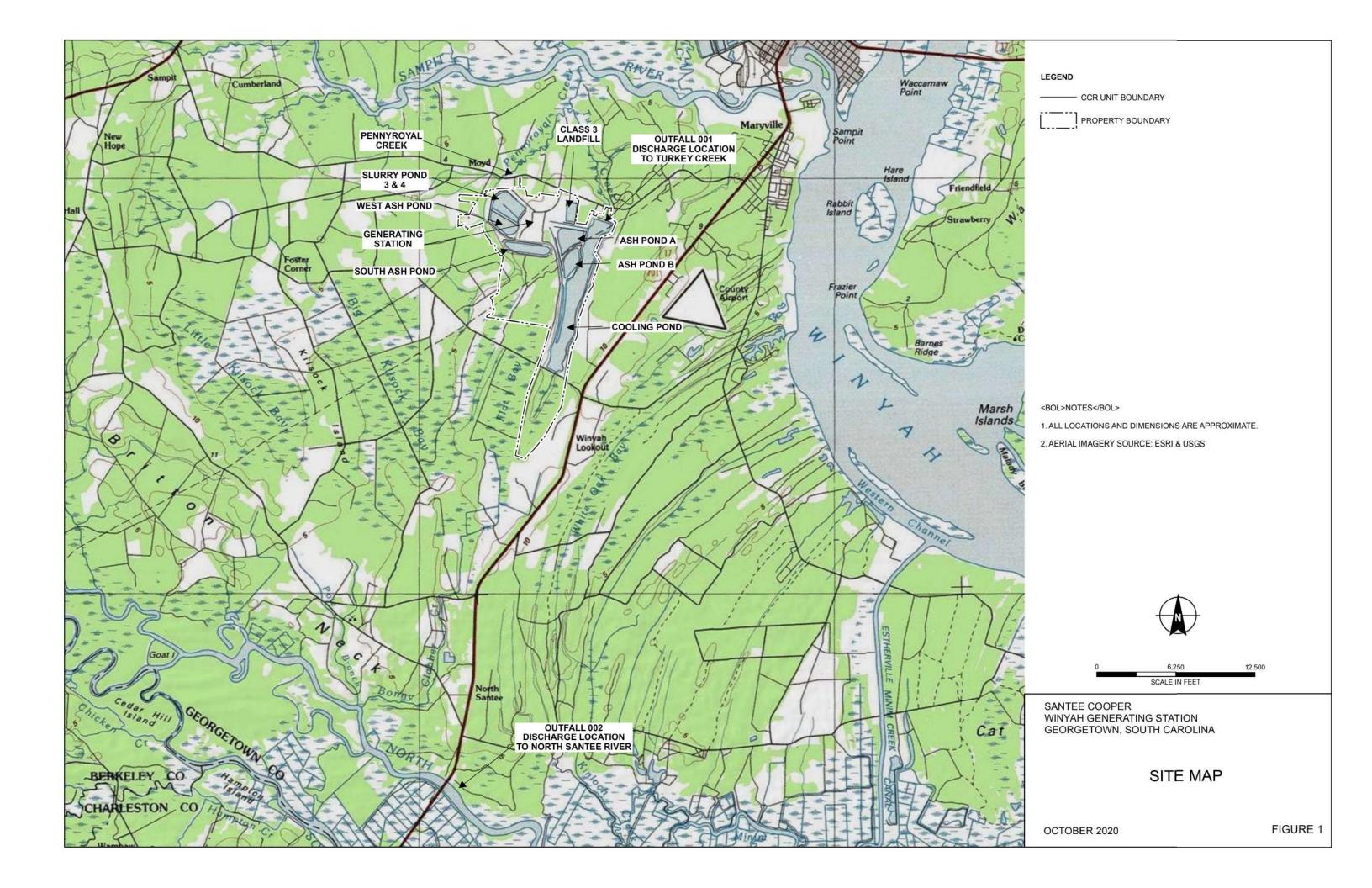


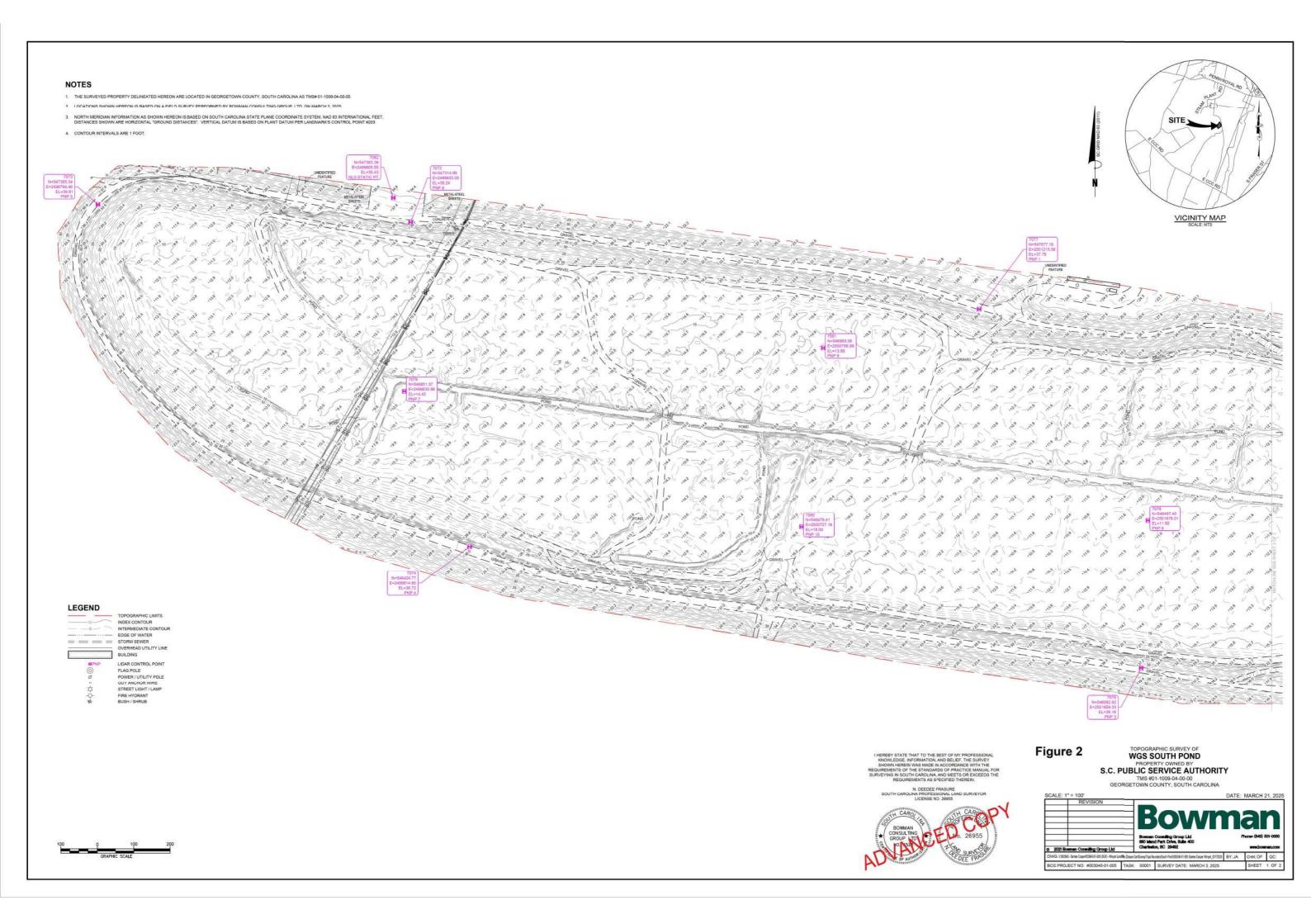
Signature

Date

10/10/2025

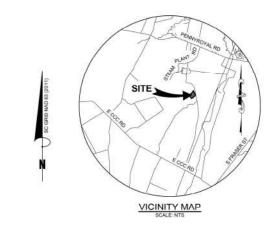


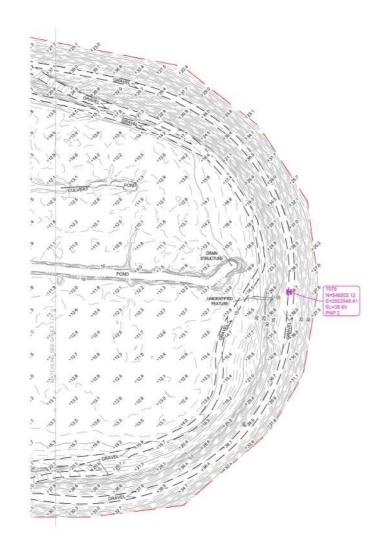




# NOTES

- 1. THE SURVEYED PROPERTY DELINEATED HEREON ARE LOCATED IN GEORGETOWN COUNTY, SOUTH CAROLINA AS TMS# 01-1009-04-00-00.
- 2. LOCATIONS SHOWN HEREON IS BASED ON A FIFED SURVEY PERFORMED BY BOWMAN CONSULTING GROUP, LTD. ON MARCH 3, 2025.
- NORTH MERIDIAN INFORMATION AS SHOWN HEREON IS BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM, NAD 83 INTERNATIONAL FEET, DISTANCES SHOWN ARE HORIZONTAL "GROUND DISTANCES". VERTICAL DATUM IS BASED ON PLANT DATUM PER LANDMARK'S CONTROL POINT #203
- 4. CONTOUR INTERVALS ARE 1 FOOT.





# LEGEND

TOPOGRAPHIC LIMITS
INDEX CONTOUR
INTERMEDIATE CONTOUR
EDGE OF WATER
STORM SEWER
OVERHEAD UTILITY LINE
BUILDING

LIDAR CONTROL POINT FLAG POLE POWER / UTILITY POLE GUY ANCHOR WIRE STREET LIGHT / LAMP FIRE HYDRANT BUSH / SHRUB

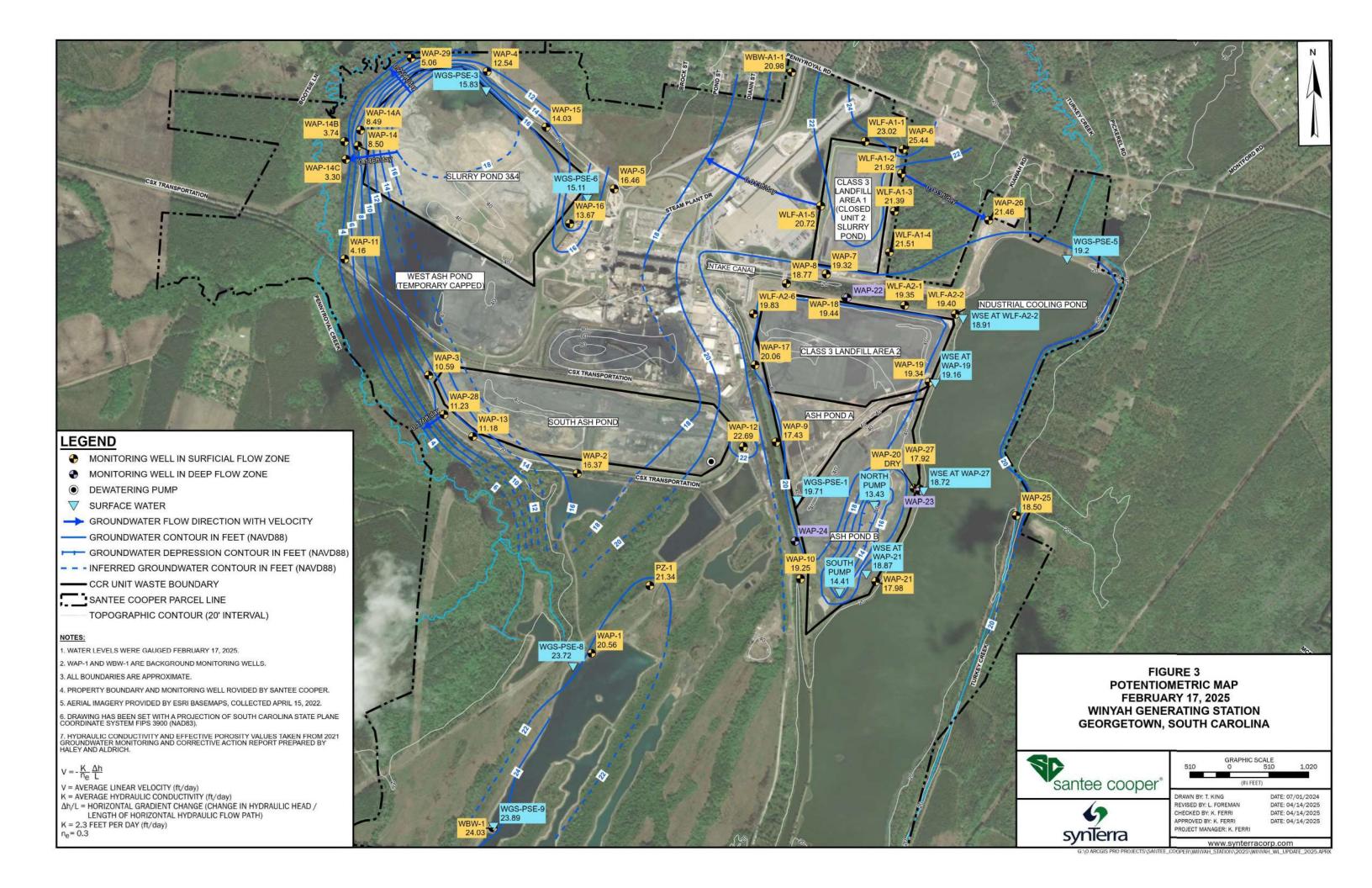


# Figure 2

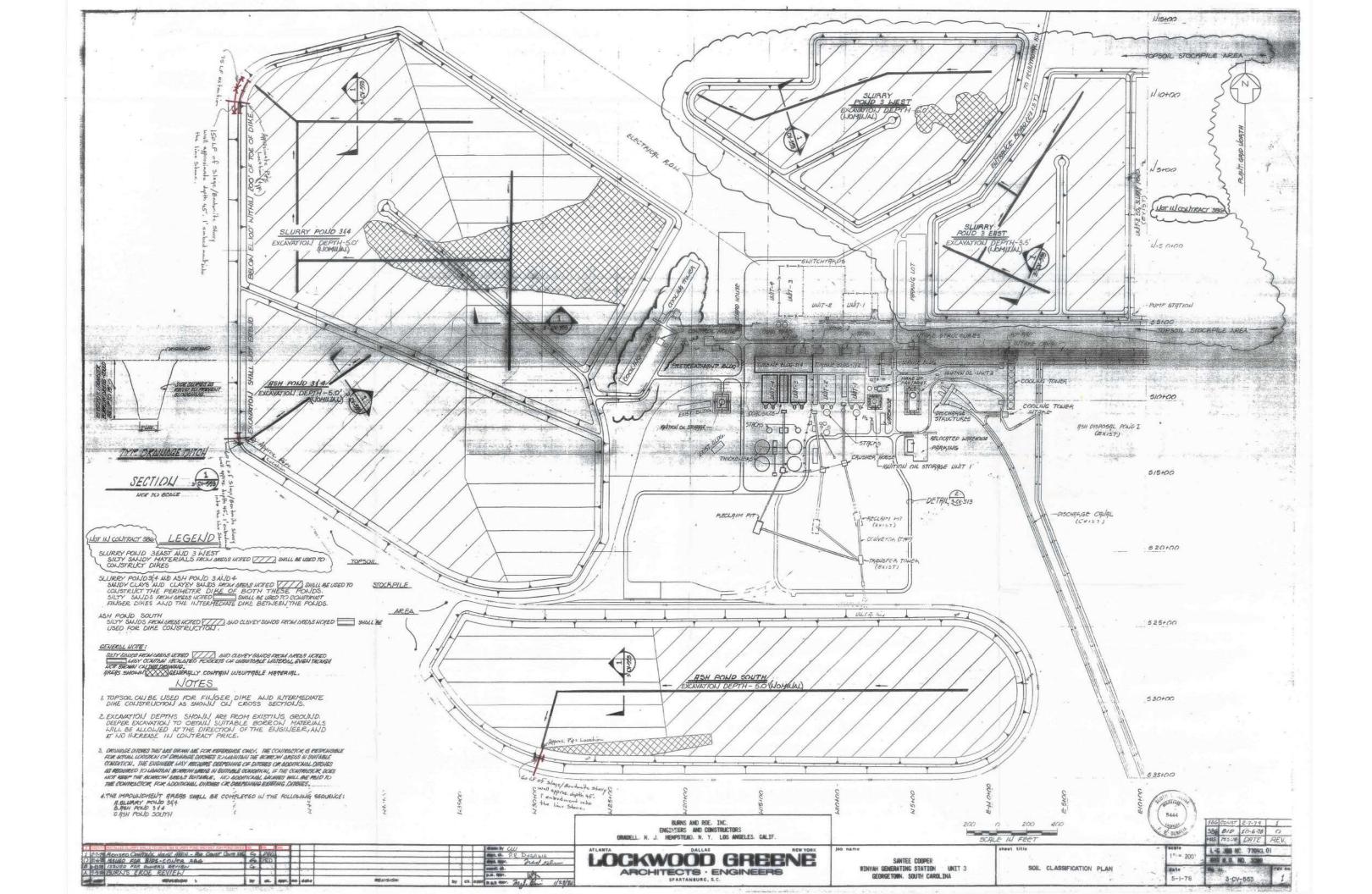
TOPOGRAPHIC SURVEY OF WGS SOUTH POND S.C. PUBLIC SERVICE AUTHORITY
TMS #01-1009-04-00-00
GEORGETOWN COUNTY, SOUTH CAROLINA

SCALE: 1" = 100" 
 ONCY 12880-5 for Committee Commi BCG PROJECT NO: #003040-01-005 TASK: 00001 SURVEY DATE: MARCH 3, 2025





# $\begin{array}{c} {\rm Appendix} \ 1 - \\ \\ {\rm Dike} \ {\rm Construction} \ {\rm Drawing} \end{array}$



# $Appendix\ 2-$

Winyah Pond Bottom Estimate Memorandum



104 South Main Street, Suite 115 Greenville, South Carolina 29601 PH 864.438.4900 FAX 864.438.4910 www.geosyntec.com

# Memorandum

Date: 6 June 2014

To: Robby White, Geosyntec

Copies to:

From: Fabian Benavente, P.E., Geosyntec

Subject: Pond Bottom Estimate

Winyah Generating Station Georgetown, South Carolina

# INTRODUCTION

At the start of the work, the base grades of the Coal Combustion Residual (CCR) ponds were estimated based on historical information. In particular, Geosyntec relied on the data available on the pre-development drawing set by Lockwood Greene prepared in 1978. Since these drawings were not as-built drawings, Geosyntec made some assumptions with regards to the borrow activity that may have taken place, in particular to construct the berms of the ponds, prior to the ponds being used to dispose CCRs. The table below presents the drawings that were used to estimate the pond bottoms for each pond in August 2013.

Pond	Drawings used to estimate pond bottom		Drawings used to estimate pond bottom	
Slurry Pond 3&4	Bottom surface: digitized from contours shown on Drawing CV-			
	541, 542, 543, 544, and 545 [Lockwood Greene, 1978]			
West Ash Pond	Bottom surface: digitized from contours shown on Drawing CV-			
	544, 545, and 546 [Lockwood Greene, 1978]			
South Ash Pond	Bottom surface: digitized from contours shown on Drawing CV-			
	549 and 550 [Lockwood Greene, 1978]			
Unit 2 Slurry Pond	Bottom surface: assumed to be 24' based on note on Drawing			
	CV-517 [Lockwood Greene, 1978]			
Ash Ponds A&B	Bottom surface: digitized from contours shown on Drawing CV-			
	504 [Lockwood Greene, 1978]			

Pond Bottom Determination 6 June 2014 Page 2

# DATA USED

As part of the ongoing work, Geosyntec performed investigations to support the geotechnical evaluation of the ponds. Although not specifically designed for this purpose, these investigations were used to estimate the transition between in-place CCR material and natural soils (i.e., the pond bottom). Three investigation campaigns were performed by Geosyntec, on February 2013, October 2013, and December 2013. In addition, Geosyntec reviewed the logs from borings drilled by Paul C. Rizzo and Associates (PCRA) in 1993 and again in 1999 to help us estimate the pond bottoms. The table below presents the quantity of investigation locations available and frequency (location per acres) for each pond.

Pond	Area (ac)	Number of Investigation Locations	Frequency
Slurry Pond 3&4 and West Ash Pond	162 (103+59)	66	1 location per 2.5 acres
South Ash Pond	73	9	1 location per 8.1 acres
Unit 2 Slurry Pond	31	28	1 location per 1.1 acres
Ash Ponds A&B	152 (88+64)	54	1 location per 2.8 acres

Drawings 1 to 4 present a plan view of the ponds with the spatial distribution of the locations used to estimate the pond bottoms.

# SURFACE INTERPOLATION AND VOLUME CALCULATION

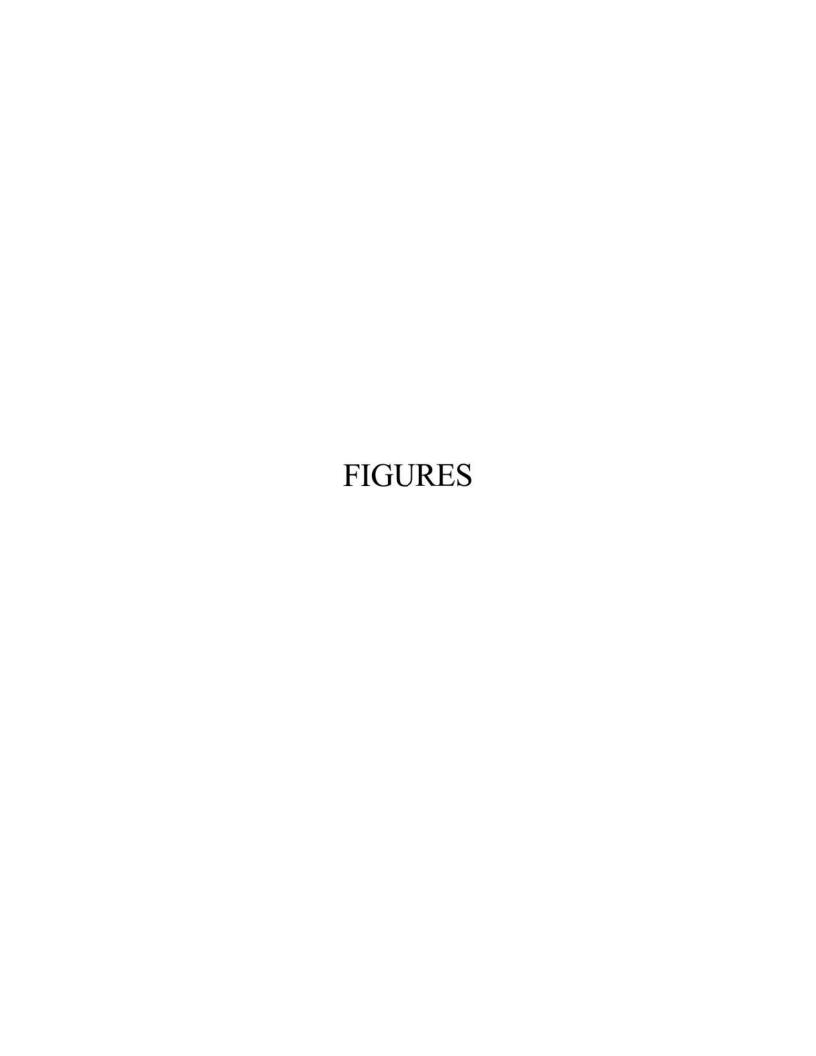
AutoCAD Civil 3D was used to interpolate between known data points and build a surface (pond bottom). The upstream slopes of the perimeter and diving dikes were estimated and made part of the surface; in addition, it was necessary to extrapolate the contours to the perimeter of the ponds (upstream slopes of perimeter dikes) in order to have a solid surface from which to work from for quantity take-offs. Drawings 5 to 8 present the pond bottom for each pond.

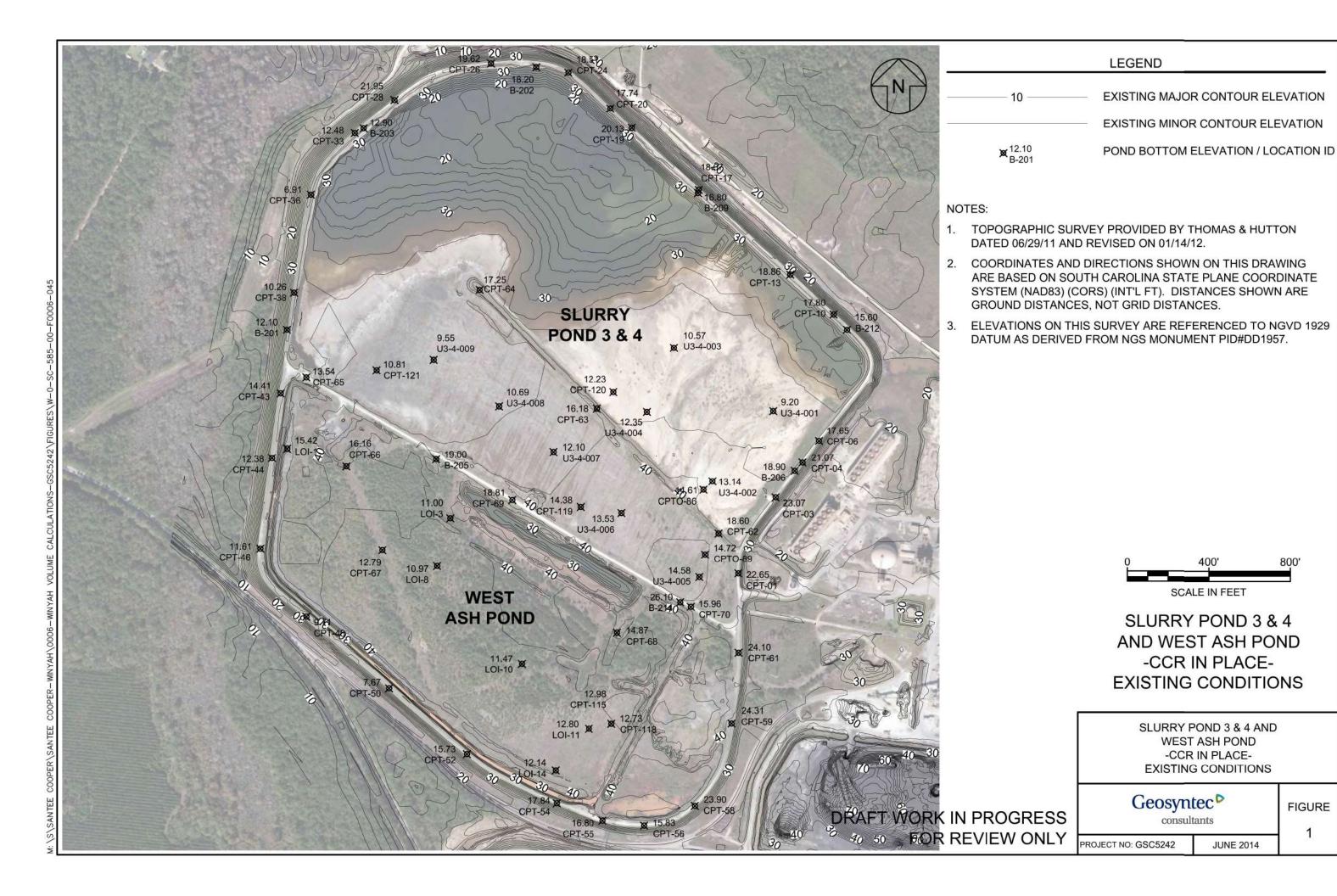
These pond bottoms were used to estimate the amount of in-place material by subtracting it from the existing ground surface (topographic survey dated 06/29/2011 and revised 1/14/2012 by Thomas & Hutton). Drawings 9 to 12 present the in-place volumes for each pond; the table below summarizes this data.

Pond	Area (ac)	Volume (cy)	Average Depth (ft)	Previously estimated volume (cy)
Slurry Pond 3&4	103	2,578,743	15.5	2,280,000 to 3,111,000
West Ash Pond	59	2,125,756	22.3	1,950,000 to 2,426,000
South Ash Pond	73	1,657,174	14.9	1,172,000 to 1,761,000
Unit 2 Slurry Pond	31	344,279	6.9	388,000
Ash Ponds A&B	152 (88+64)	4,264,211	17.4	3,804,000
		(2,730,225 +		
		1,533,886)		

Four (4) cross-sections for each of the ponds are presented in Drawings 13 to 18; these cross-sections show pond bottom, existing ground surface, and also two potentiometric surfaces: the potentiometric surface measured in June 2013 and the potentiometric surface modeled with the assumption that the ponds have been drained.

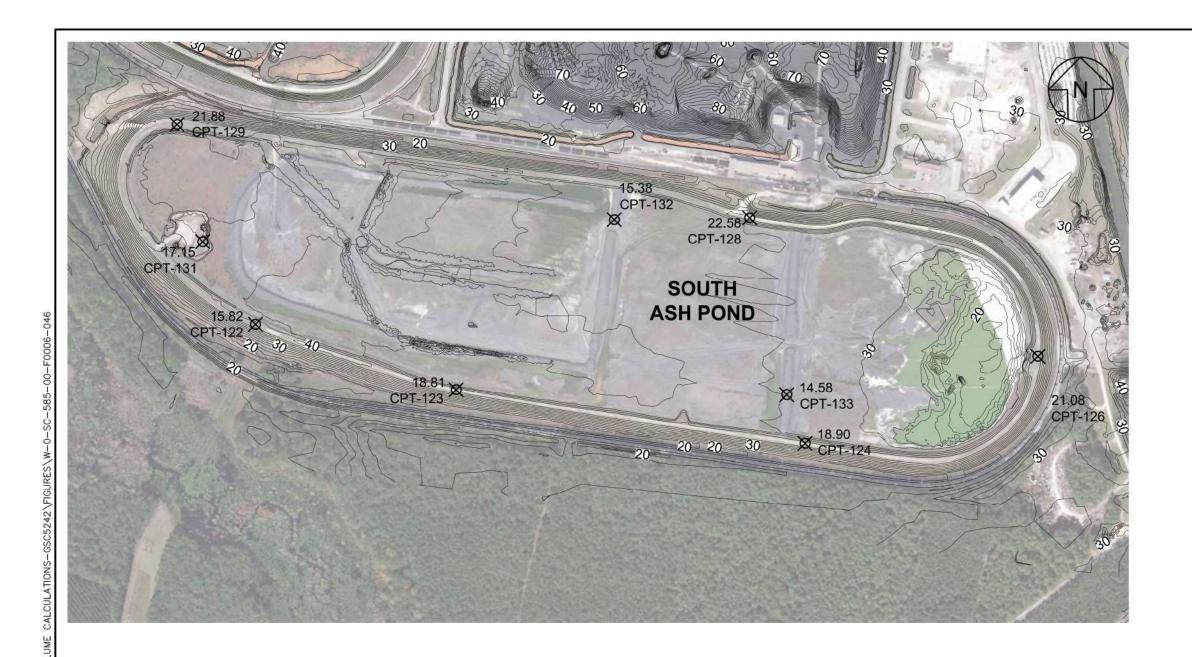
\* \* \* \* \*

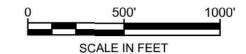




800'

**FIGURE** 





# SOUTH ASH POND -CCR IN PLACEEXISTING CONDITIONS

-CCR	HASH POND IN PLACE- G CONDITIONS	
Geosyn		FIGURI 2
PROJECT NO: GSC5242	JUNE 2014	1 -

**LEGEND** 

20 EXISTING MAJOR CONTOUR ELEVATION

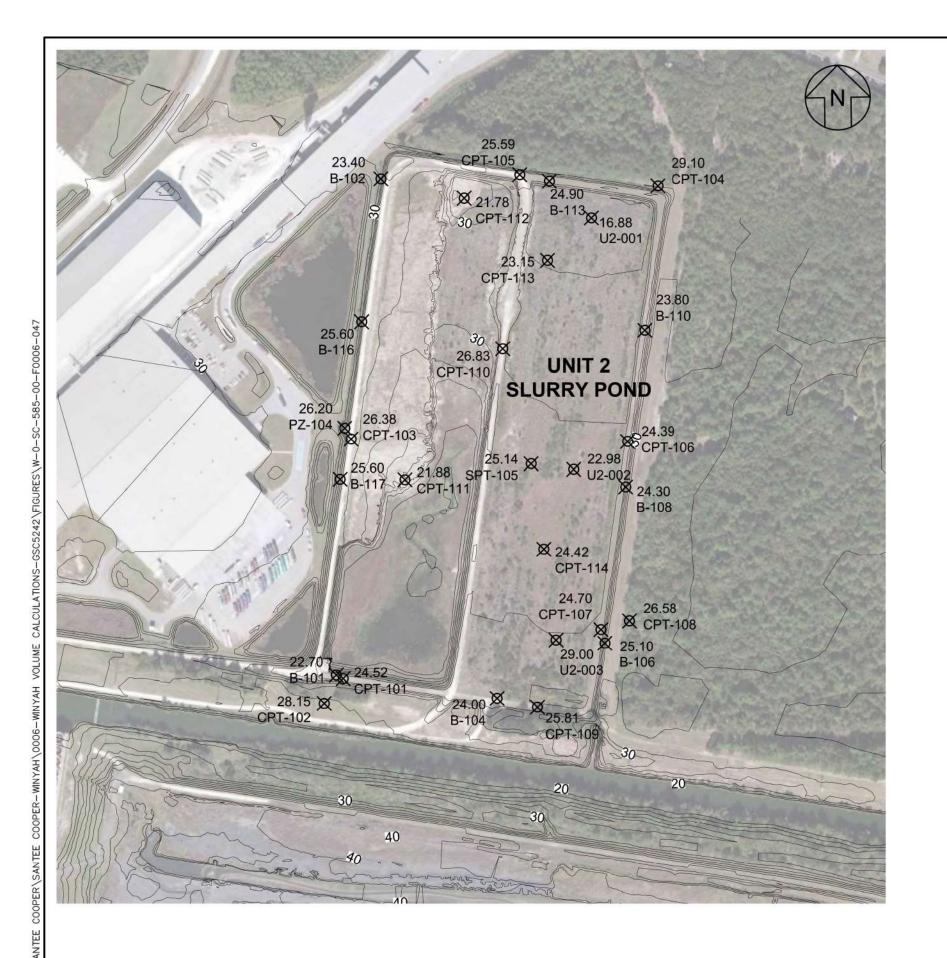
EXISTING MINOR CONTOUR ELEVATION

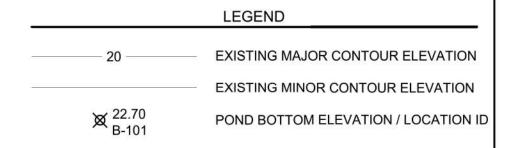
X 15.82 POND BOTTOM ELEVATION / LOCATION ID

# NOTES:

- 1. TOPOGRAPHIC SURVEY PROVIDED BY THOMAS & HUTTON DATED 06/29/11 AND REVISED ON 01/14/12.
- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
- 3. ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.

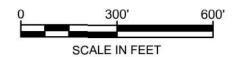
DRAFT WORK IN PROGRESS-FOR REVIEW ONLY





# NOTES:

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- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
- 3. ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.



**UNIT 2 SLURRY POND** -CCR IN PLACE-**EXISTING CONDITIONS** 

> **UNIT 2 SLURRY POND** -CCR IN PLACE-**EXISTING CONDITIONS**

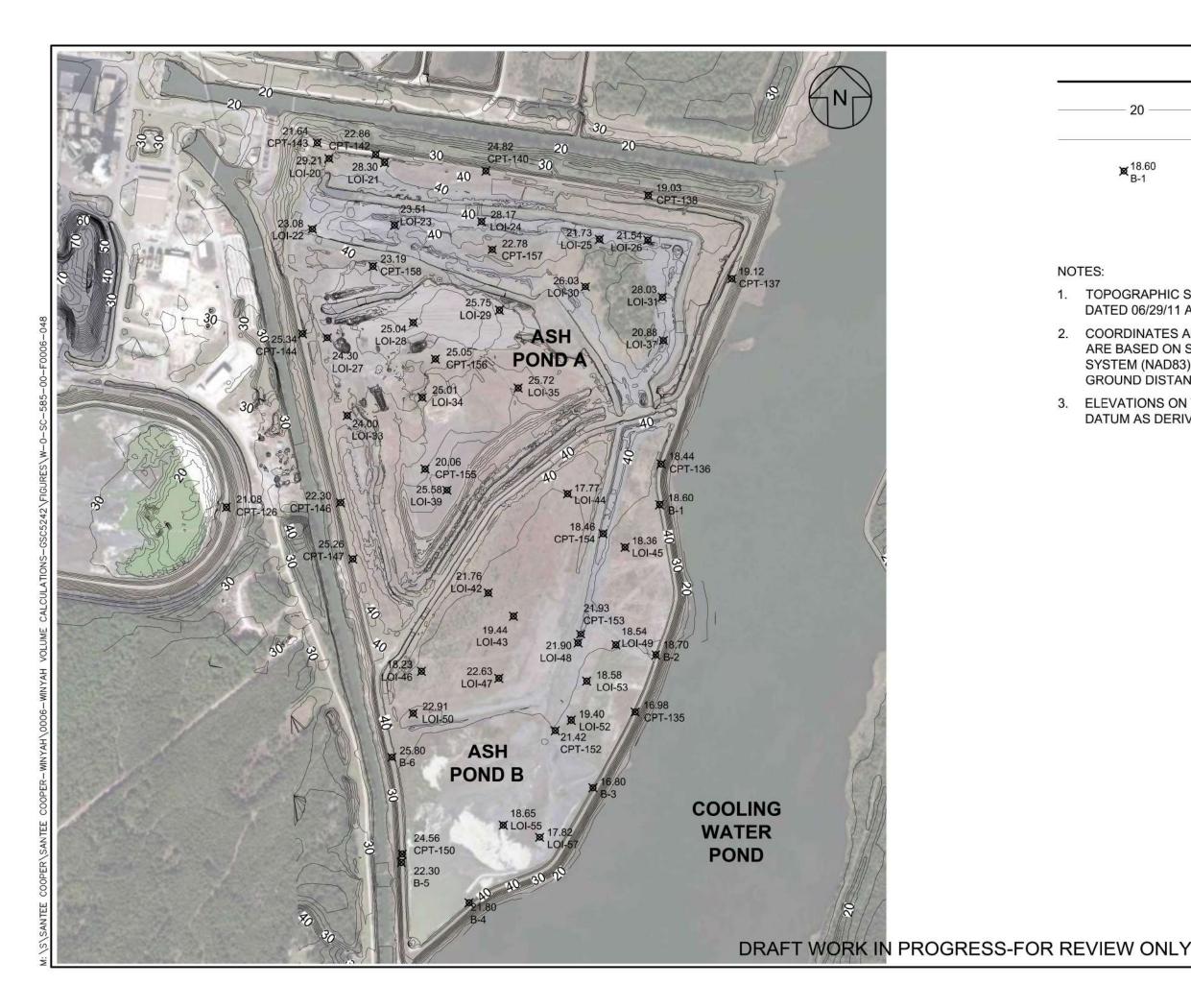
Geosyntec D consultants

**FIGURE** 3

PROJECT NO: GSC5242

DRAFT WORK IN PROGRESS FOR REVIEW ONLY

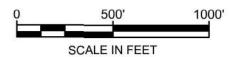
JUNE 2014



**LEGEND EXISTING MAJOR CONTOUR ELEVATION** 20 EXISTING MINOR CONTOUR ELEVATION **⊠**<sup>18.60</sup><sub>B-1</sub> POND BOTTOM ELEVATION / LOCATION ID

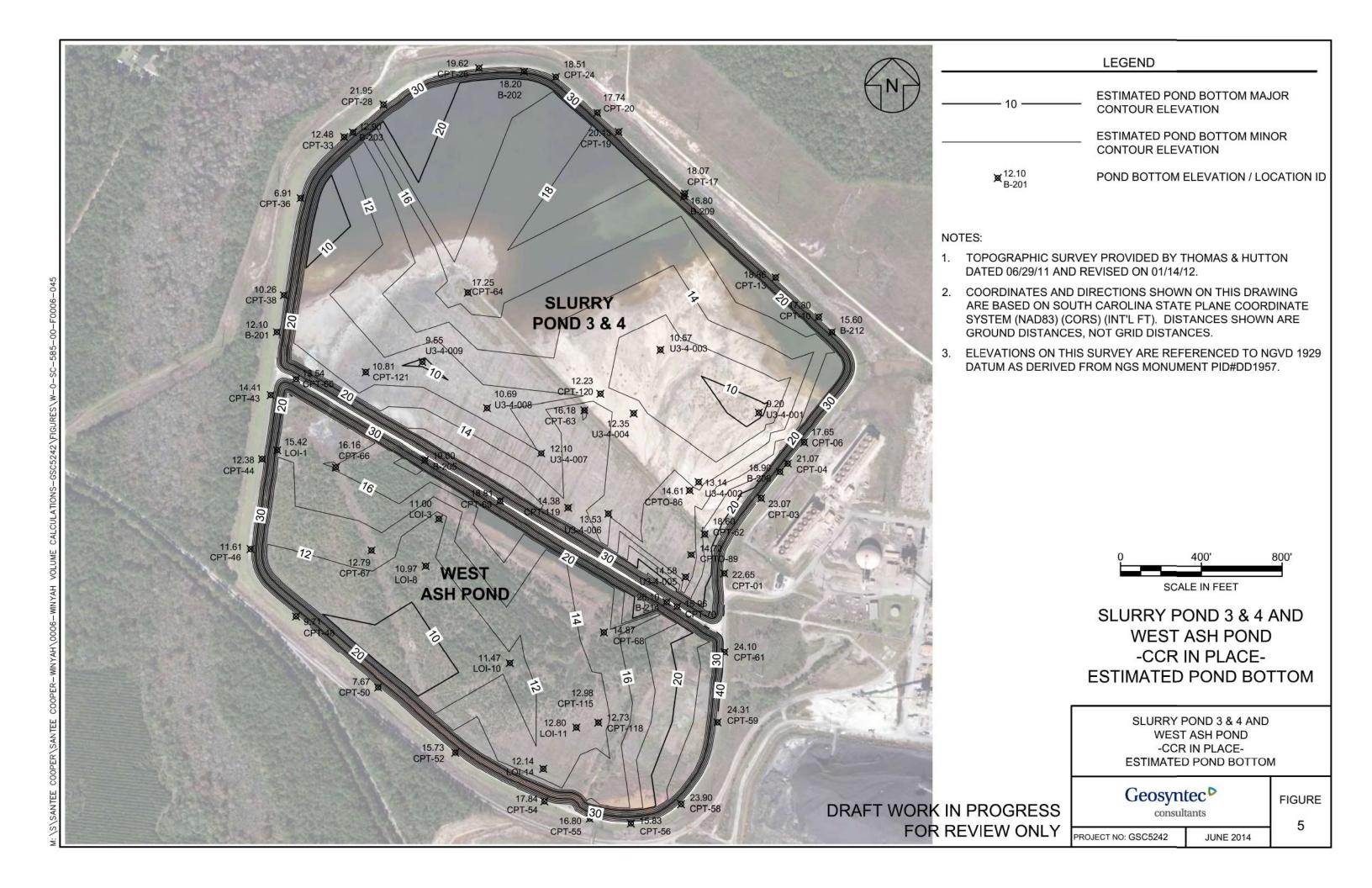
# NOTES:

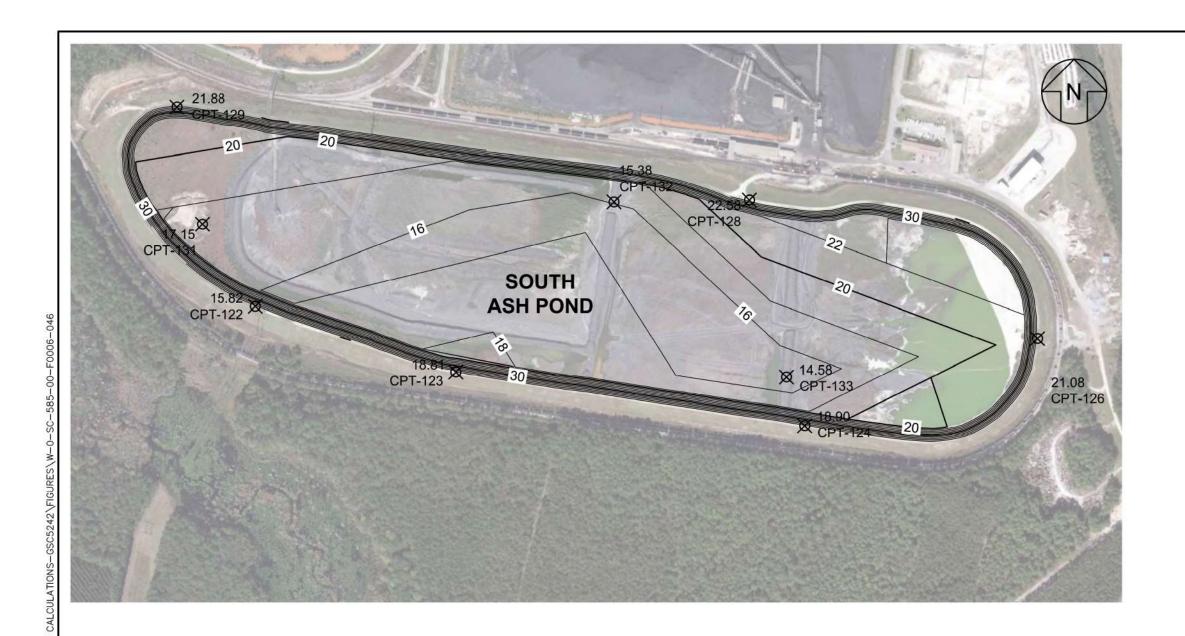
- TOPOGRAPHIC SURVEY PROVIDED BY THOMAS & HUTTON DATED 06/29/11 AND REVISED ON 01/14/12.
- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
- ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.



ASH POND A & B -CCR IN PLACE-**EXISTING CONDITIONS** 

ASH POND A & B -CCR IN PLACE-**EXISTING CONDITIONS** Geosyntec D **FIGURE** consultants PROJECT NO: GSC5242 JUNE 2014







# SOUTH ASH POND -CCR IN PLACEESTIMATED POND BOTTOM

SOUTH ASH POND
-CCR IN PLACEESTIMATED POND BOTTOM

Geosyntec Consultants

PROJECT NO: GSC5242 JUNE 2014

SOUTH ASH POND
FIGURE

6

**LEGEND** 

\_\_\_\_\_ 20 \_\_\_\_\_ ESTIMATED POND BOTTOM MAJOR CONTOUR ELEVATION

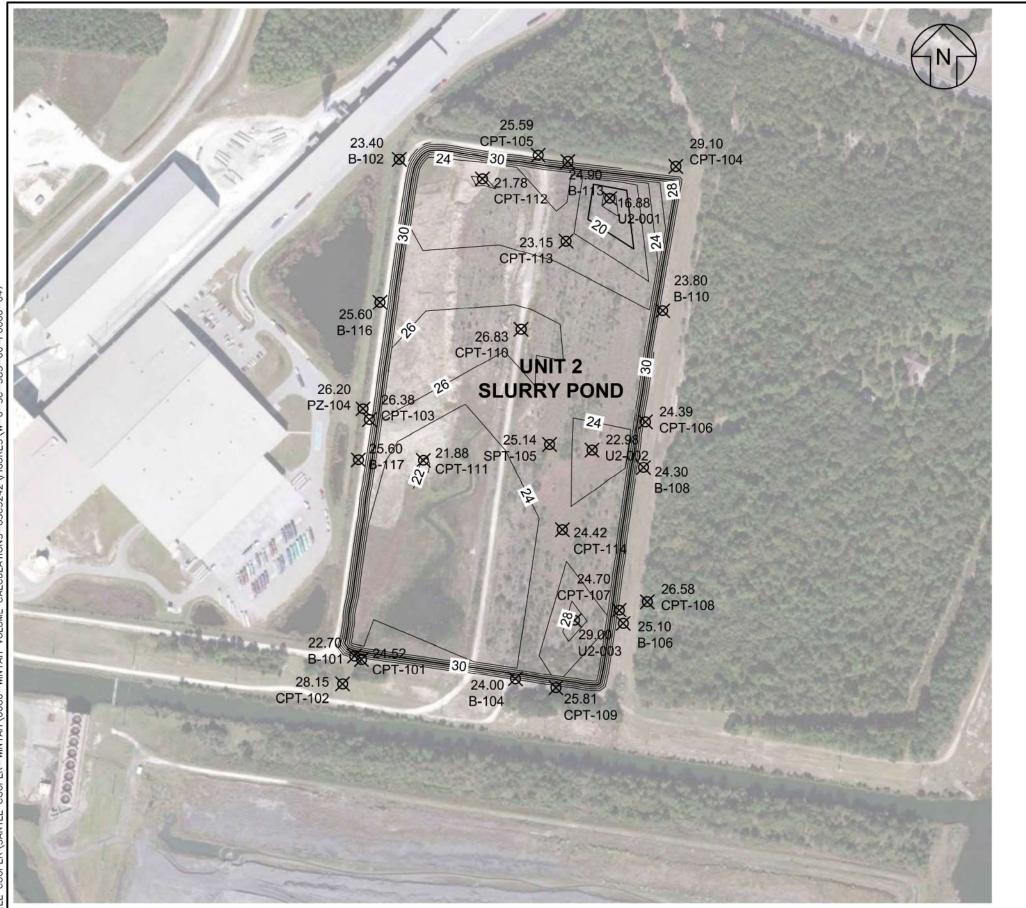
ESTIMATED POND BOTTOM MINOR CONTOUR ELEVATION

 $\bowtie$  15.82 POND BOTTOM ELEVATION / LOCATION ID

# NOTES:

- TOPOGRAPHIC SURVEY PROVIDED BY THOMAS & HUTTON DATED 06/29/11 AND REVISED ON 01/14/12.
- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
- 3. ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.

DRAFT WORK IN PROGRESS-FOR REVIEW ONLY



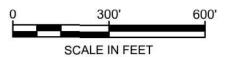
ESTIMATED POND BOTTOM MAJOR
CONTOUR ELEVATION

ESTIMATED POND BOTTOM MINOR
CONTOUR ELEVATION

22.70
POND BOTTOM ELEVATION / LOCATION ID

# NOTES:

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- DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.



UNIT 2 SLURRY POND
-CCR IN PLACEESTIMATED POND BOTTOM

UNIT 2 SLURRY POND
-CCR IN PLACEESTIMATED POND BOTTOM

Geosyntec consultants

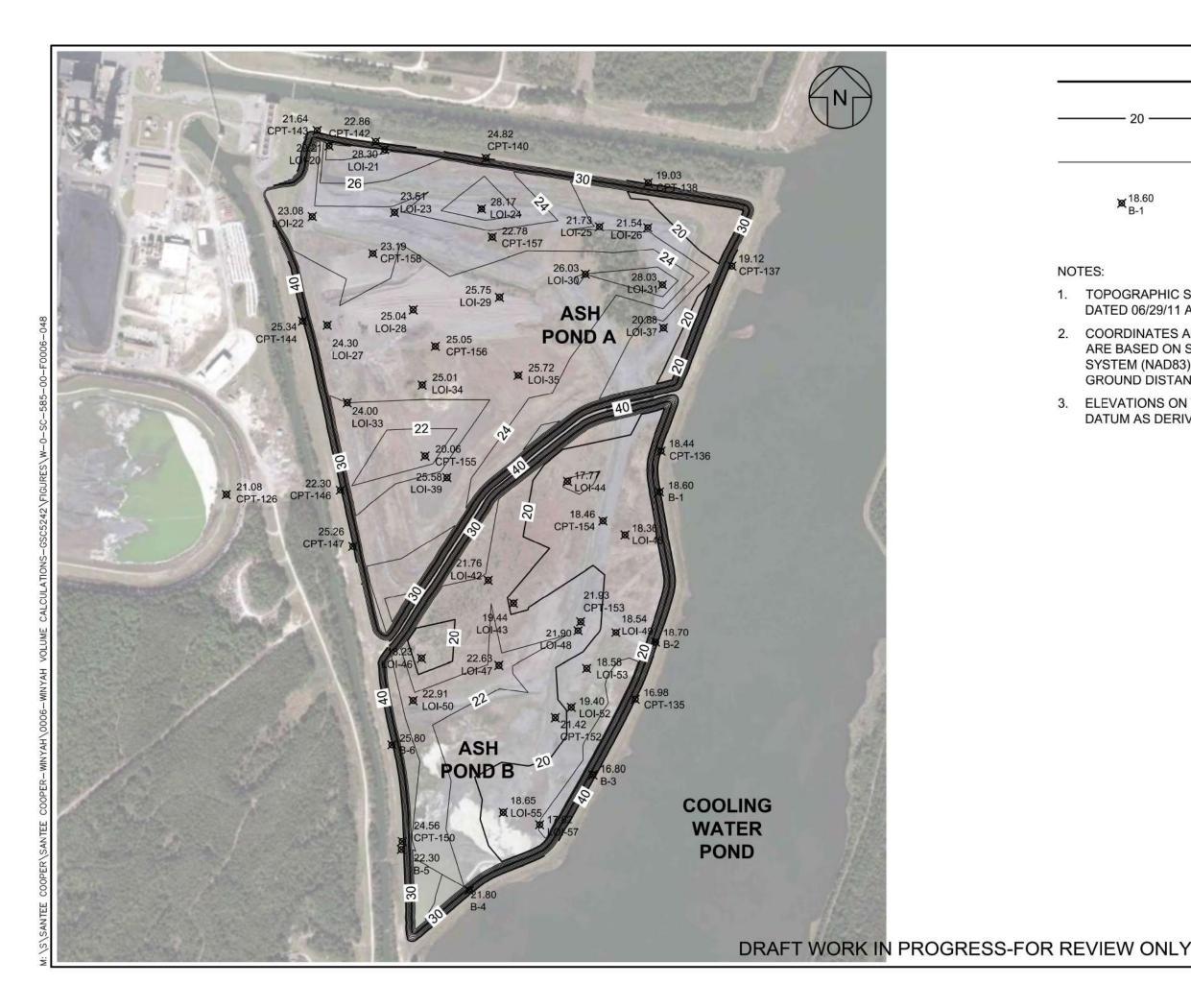
FIGURE

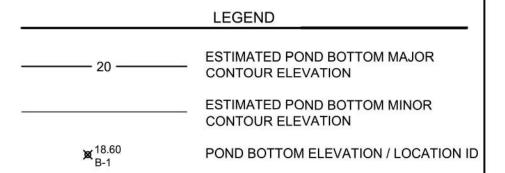
PROJECT NO: GSC5242

JUNE 2014

DRAFT WORK IN PROGRESS FOR REVIEW ONLY

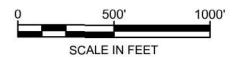
4





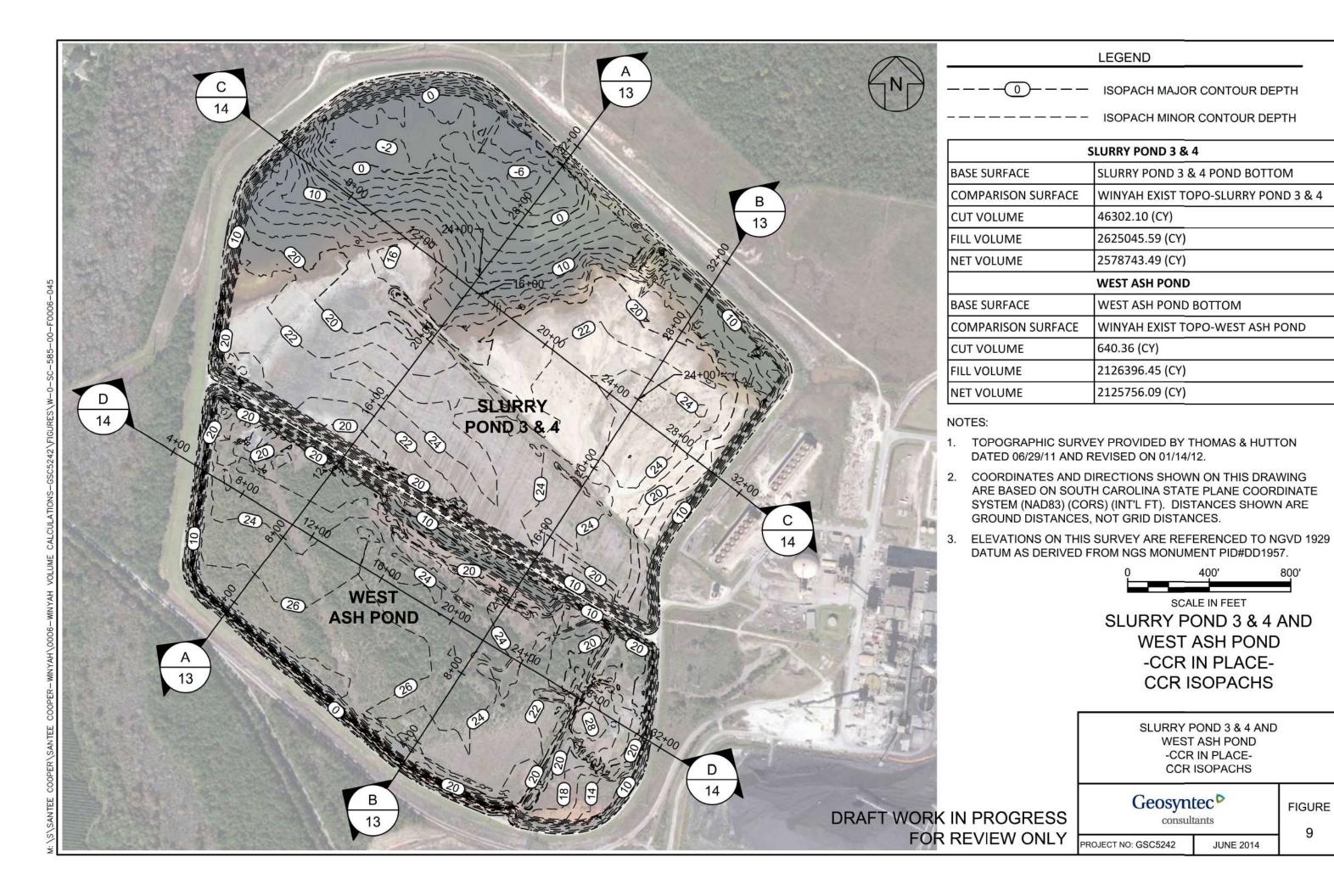
# NOTES:

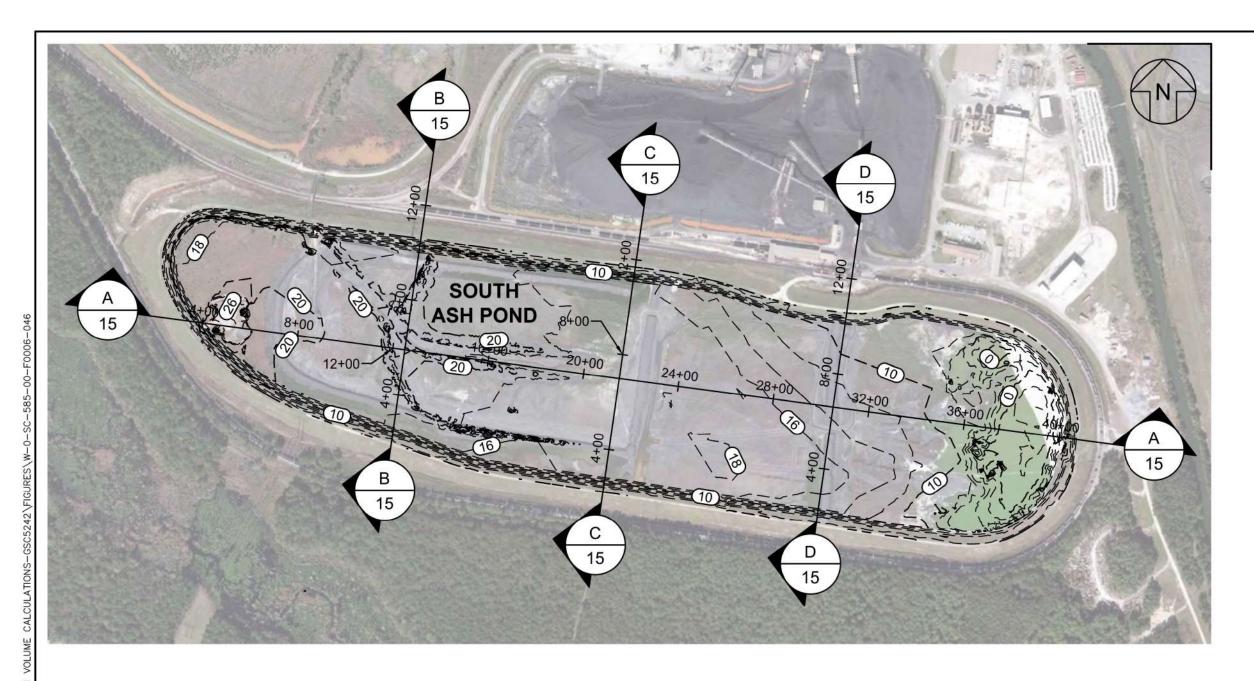
- TOPOGRAPHIC SURVEY PROVIDED BY THOMAS & HUTTON DATED 06/29/11 AND REVISED ON 01/14/12.
- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
- 3. ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.



# ASH POND A & B -CCR IN PLACE-**ESTIMATED POND BOTTOM**

ASH POND A & B -CCR IN PLACE-**ESTIMATED POND BOTTOM** Geosyntec D **FIGURE** consultants 8 PROJECT NO: GSC5242 JUNE 2014





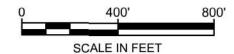


---- ISOPACH MAJOR CONTOUR DEPTH

SOUTH ASH POND	
BASE SURFACE	SOUTH ASH POND BOTTOM
COMPARISON SURFACE	WINYAH EXIST TOPO-SOUTH ASH POND
CUT VOLUME	6412.01 (CY)
FILL VOLUME	1663585.90 (CY)
NET VOLUME	1657173.89 (CY)

# NOTES:

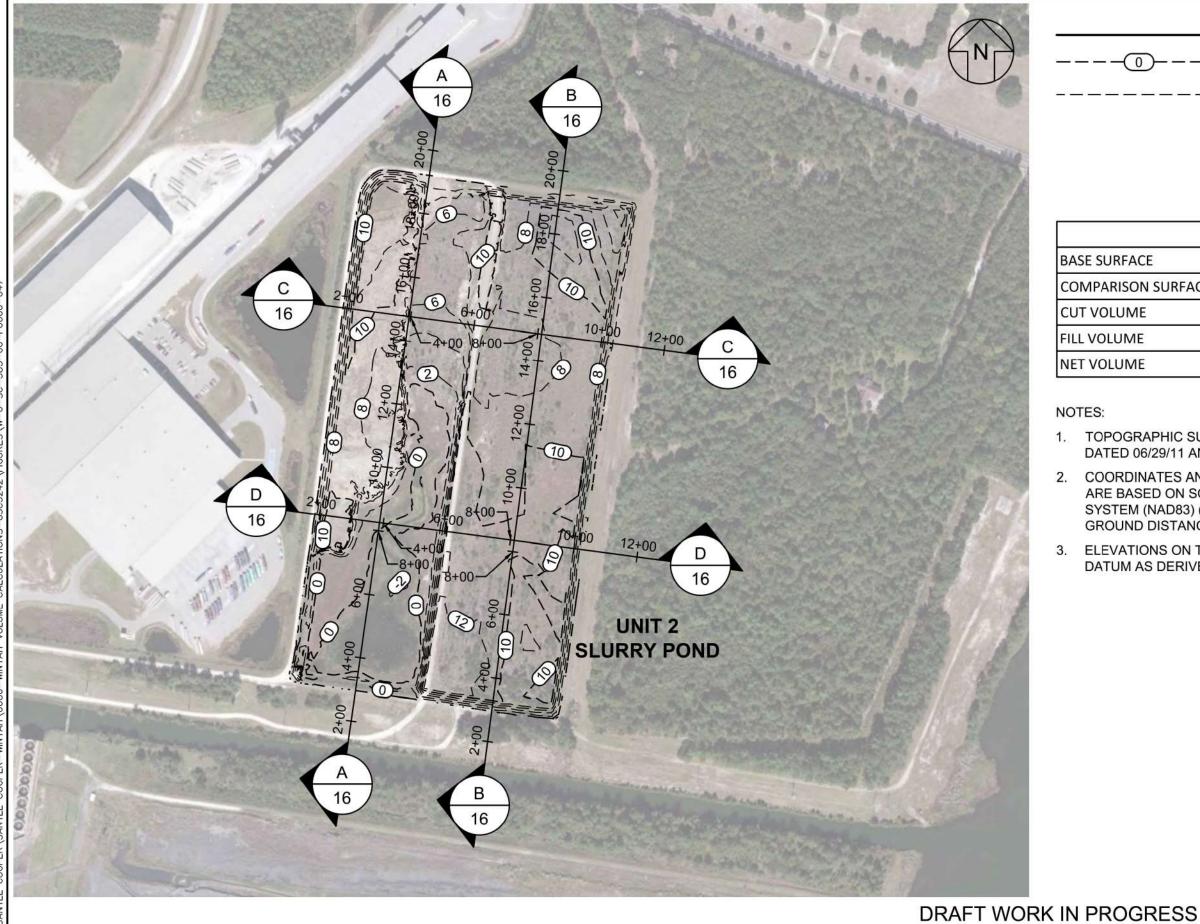
- TOPOGRAPHIC SURVEY PROVIDED BY THOMAS & HUTTON DATED 06/29/11 AND REVISED ON 01/14/12.
- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
- 3. ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.

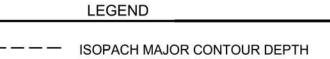


SOUTH ASH POND -CCR IN PLACE-CCR ISOPACH

-CCR	H ASH POND IN PLACE- I ISOPACH	
Geosyn		FIGURE
PROJECT NO: GSC5242	JUNE 2014	1 10

DRAFT WORK IN PROGRESS-FOR REVIEW ONLY





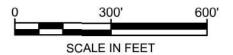
ISOPACH MINOR CONTOUR DEPTH

Į.	UNIT 2 SLURRY POND
BASE SURFACE	UNIT 2 SLURRY POND BOTTOM
COMPARISON SURFACE	WINYAH EXIST TOPO-UNIT 2 SLURRY POND
CUT VOLUME	5426.84 (CY)
FILL VOLUME	349706.15 (CY)
NET VOLUME	344279.31 (CY)

# NOTES:

FOR REVIEW ONLY

- TOPOGRAPHIC SURVEY PROVIDED BY THOMAS & HUTTON DATED 06/29/11 AND REVISED ON 01/14/12.
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- 3. ELEVATIONS ON THIS SURVEY ARE REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.



**UNIT 2 SLURRY POND** -CCR IN PLACE-**CCR ISOPACH** 

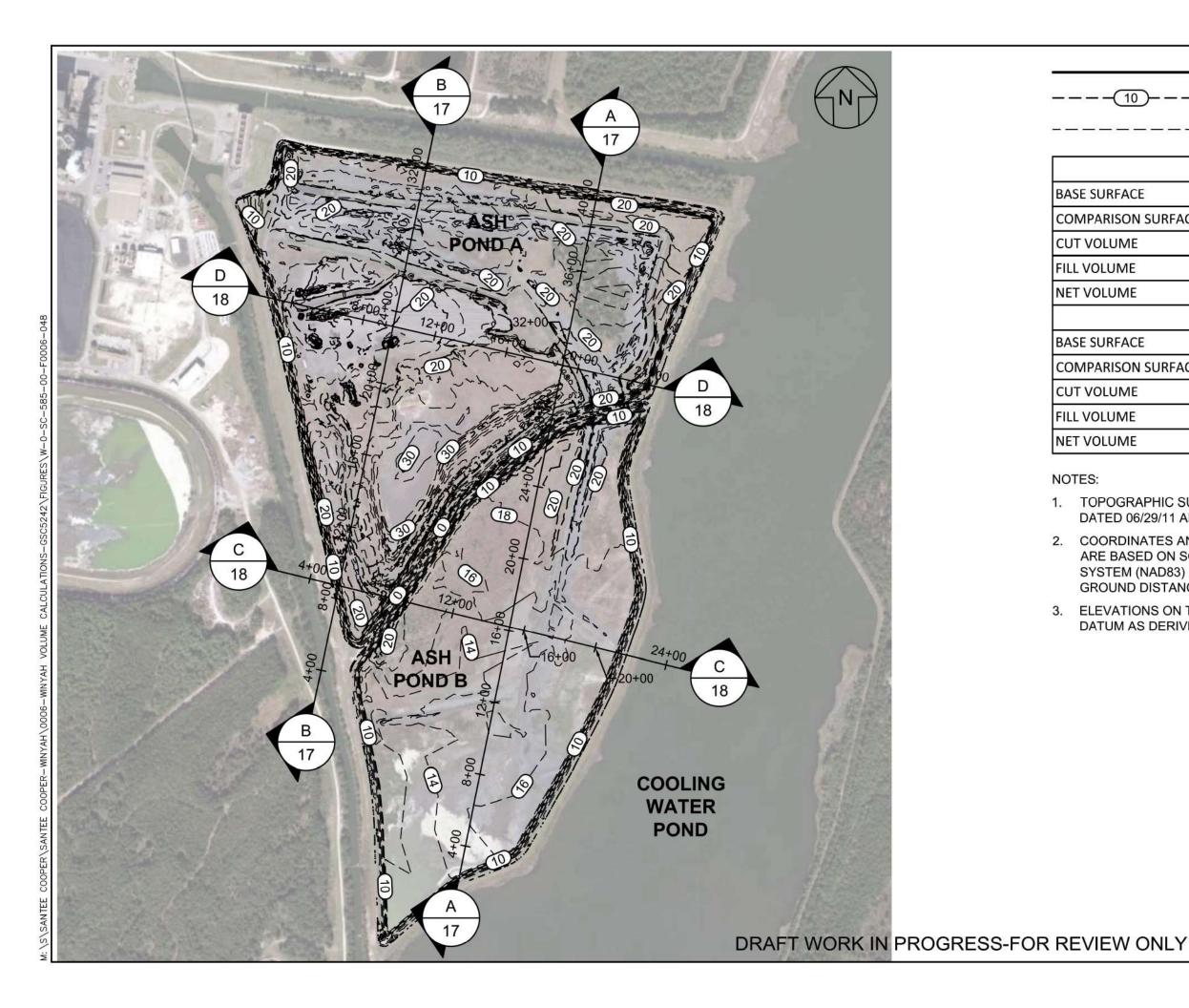
**UNIT 2 SLURRY POND** -CCR IN PLACE-CCR ISOPACH

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**FIGURE** 11

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JUNE 2014

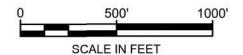


LEGEND ISOPACH MAJOR CONTOUR DEPTH ISOPACH MINOR CONTOUR DEPTH

ASH POND A		
BASE SURFACE	ASH POND A BOTTOM	
COMPARISON SURFACE	WINYAH EXIST TOPO-ASH POND A	
CUT VOLUME	9.04 (CY)	
FILL VOLUME	2730334.49 (CY)	
NET VOLUME	2730325.45 (CY)	
	ASH POND B	
BASE SURFACE	ASH POND B BOTTOM	
COMPARISON SURFACE	WINYAH EXIST TOPO-ASH POND B	
CUT VOLUME	46.78 (CY)	
FILL VOLUME	1533932.83 (CY)	
NET VOLUME	1533886.06 (CY)	

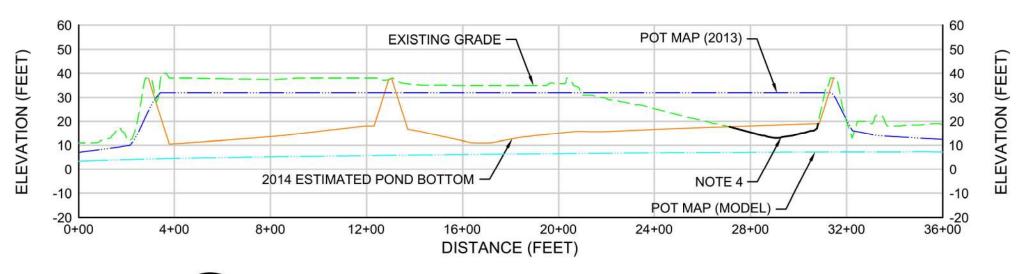
# NOTES:

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- 2. COORDINATES AND DIRECTIONS SHOWN ON THIS DRAWING ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM (NAD83) (CORS) (INT'L FT). DISTANCES SHOWN ARE GROUND DISTANCES, NOT GRID DISTANCES.
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ASH POND A & B -CCR IN PLACE-**CCR ISOPACHS** 

ASH POND A & B -CCR IN PLACE-CCR ISOPACHS Geosyntec ▶ **FIGURE** consultants 12 PROJECT NO: GSC5242 JUNE 2014

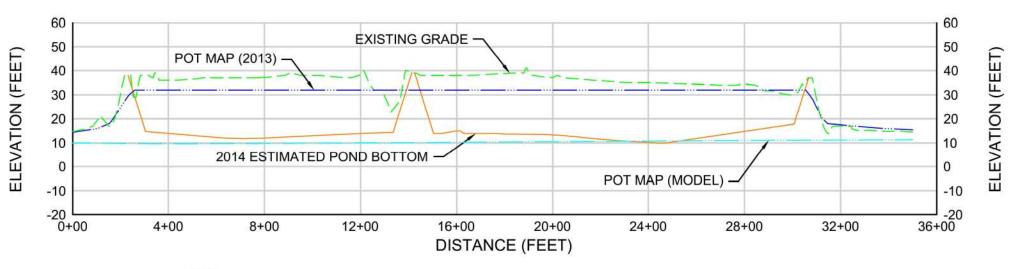


# 9

# **SECTION**

# SLURRY POND 3 & 4 AND WEST ASH POND

SCALE: 1" = 400' (HORIZONTAL) 1" = 40' (VERTICAL) XREF: W-0-SC-585-00-F0006-045





# **SECTION**

# SLURRY POND 3 & 4 AND WEST ASH POND

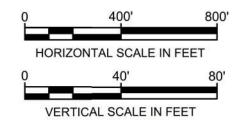
SCALE: 1" = 400' (HORIZONTAL) 1" = 40' (VERTICAL) XREF: W-0-SC-585-00-F0006-045

> DRAFT WORK IN PROGRESS FOR REVIEW ONLY

# LEGEND **EXISTING GRADE** ESTIMATED POND BOTTOM (2014)POTENTIOMETRIC SURFACE (2013)POTENTIOMETRIC SURFACE MODEL AS IF PONDS ARE DRAINED

### NOTES:

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- **ELEVATIONS ON THIS SURVEY ARE** REFERENCED TO NGVD 1929 DATUM AS DERIVED FROM NGS MONUMENT PID#DD1957.
- **ESTIMATED POND BOTTOM IN AREA** WAS MANUALLY MADE TO COINCIDE WITH EXISTING GRADE.



**SLURRY POND 3 & 4 AND WEST ASH POND** -CCR IN PLACE-SITE SECTIONS

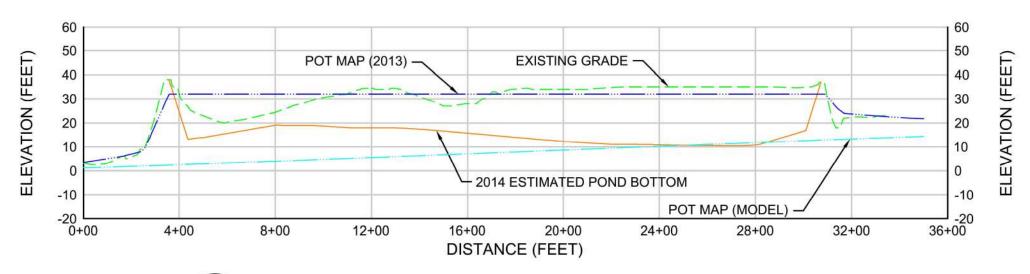
> SLURRY POND 3 & 4 AND WEST ASH POND -CCR IN PLACE-SITE SECTIONS

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PROJECT NO: GSC5242 JUNE 2014 13

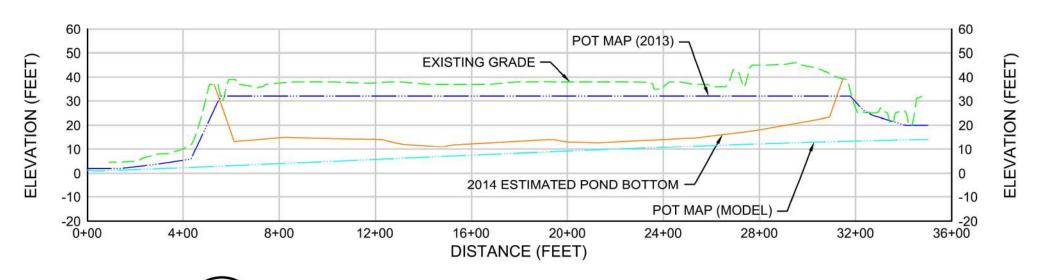
**FIGURE** 



# **SECTION**

# SLURRY POND 3 & 4 AND WEST ASH POND

SCALE: 1" = 400' (HORIZONTAL) 1" = 40' (VERTICAL) XREF: W-0-SC-585-00-F0006-045





# **SECTION**

# SLURRY POND 3 & 4 AND WEST ASH POND

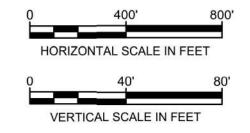
SCALE: 1" = 400' (HORIZONTAL) 1" = 40' (VERTICAL) XREF: W-0-SC-585-00-F0006-045

> DRAFT WORK IN PROGRESS FOR REVIEW ONLY

# LEGEND **EXISTING GRADE** ESTIMATED POND BOTTOM (2014)POTENTIOMETRIC SURFACE (2013)POTENTIOMETRIC SURFACE MODEL AS IF PONDS ARE DRAINED

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**SLURRY POND 3 & 4 AND WEST ASH POND** -CCR IN PLACE-SITE SECTIONS

SLURRY POND 3 & 4 AND WEST ASH POND -CCR IN PLACE-SITE SECTIONS

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**FIGURE** 

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