Notice of Assessment Monitoring
Winyah Generating Station, Unit 2 Slurry Pond

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 Winyah Generating Station, located in Georgetown 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)).

The Unit 2 Slurry Pond was closed by removal of the CCR material, FGD slurry, and contact soil. South Carolina Department of Health and Environmental Control (SC DHEC) certified pond closure was complete in accordance with state regulations on November 9, 2017. The Winyah Class 3 Landfill was constructed within the same footprint and received a Permit to Operate from SC DHEC on November 1, 2018.

Haley & Aldrich conducted an evaluation of groundwater quality at the Former Unit 2 Slurry Pond/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 Former Unit 2 Slurry Pond/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.

The detection monitoring and subsequent review for the Class 3 Landfill identified the Former Unit 2 Slurry Pond as a potential contributing source that could serve as an ASD for the SSI's observed in the CCR well network for the Class 3 Landfill. Supplemental site-specific and regional information may be reconsidered later to re-evaluate apparent alternate sources for Appendix III SSI's and may result in potentially different outcomes than presented in this report.

Consistent with § 257.94(e)(3) and § 257.105(h)(5), Santee Cooper is providing notification that an assessment monitoring program has been established for the Former Unit 2 Slurry Pond meeting the requirements of § 257.95.