

SCANA
Corporate Environmental Services
220 Operation Way
Cayce, SC 29033-3701

September 29, 2016

RECEIVED

OCT 0 4 2016

SITE ASSESSMENT, REMEDIATION & REVITALIZATION

Mr. Brice McKoy Northwest Regulatory Branch Chief

Mr. Chip Ridgeway Project Manager U.S. Army Corps of Engineers Strom Thurmond Federal Building 1835 Assembly Street, Room 865 B-1 Columbia, South Carolina 29201

RE: Joint Application and Pre-Construction Notification (JA-PCN)

Phase 2 – Modified Removal Action (MRA) – Sediment Capping Project

SCE&G - Congaree River Sediments

Columbia, South Carolina

USACE Project Number: SAC-2011-01356-6NO

Response to Comments

Dear Sirs:

On behalf of SCANA Services, Inc., (SCANA) and their primary subsidiary, South Carolina Electric & Gas Company Inc. (SCE&G), enclosed please find the following responses to the initial comments provided by the USACE regarding the September 22, 2016 submittal of the Joint Application and Pre-Construction Notification (JA-PCN) for the Congaree River Sediments Project.

The USACE has provided two initial comments based on their preliminary review of the permit application package as submitted on September 22, 2016. The two initial comments were:

- 1. Are there any cross-sections in the submittal?
- 2. Is there any type of monitoring/contingency plan in the submittal?

Regarding the cross-sections, yes - there was one cross-section provided in Attachment B, Conceptual Design of Sediment Capping Options Developed by Rizzo and Associates, Figure 2 – ACB Mat Profile. Based on this comment, we have also developed the attached Figure 6 – Typical Cross-Section to be inserted (consecutively numbered) into the "Figures" section of the Application so as to be more prominent.

Regarding the monitoring/contingency plan comment, there was no specific plan entitled Sediment Monitoring/Contingency Plan presented within this JA-PCN submittal. However, these elements were briefly discussed in the submittal. Please refer to page 4 [of the JA], where we discuss the need for sediment containment during construction and mitigation plans along with total suspended solids (TSS) monitoring plan.



As noted on Page 10 of the JA-PCN submittal, under the highlighted section of "Additional Permit and Approval Requirements", please note the second bulleted item – "SCDHEC approval of the Sediment Capping Work Plan (SCWP)". It was our intention to include the Sediment Monitoring Plan, as well as many other support plans into the SCWP. As envisioned, the SCWP will be submitted, reviewed and subsequently approved by SCDHEC and then submitted to the USACE, along with the SCDHEC approval letter. This process is consistent with the permitting process used for the Field Demonstration Project (FDP). We also envisioned that, similar to the Phase 1 – FDP permit/approval process, adherence to the Phase 2 - SCWP will be a requirement of the USACE's approval, as a "special condition".

Thank you for your prompt review and initial comments. We would appreciate an opportunity to review the attached documents with you at your earliest convenience and sincerely appreciate your interest and assistance in this project. If you have any questions or require any additional information, please call Rusty Contrael at 412-829-9650 or me at 919-819-2748.

Sincerely,

Robert M. Apple

Remediation Project Manager

CC:

L. Berresford - SCDHEC (w/ enclosure)

- R. Cath FOR

R. Contrael, B. Zeli, T. Wolf – Apex (w/o enclosure)

