



May 21, 2020

Mr. Thomas Effinger
Dominion Energy
Mail Code C-221
220 Operation Way
Cayce, SC 29033-3701

RE: Revised Permit Application Strategy
SCE&G Fleet Maintenance Site (Congaree River)
Columbia, South Carolina

Dear Mr. Effinger:

On April 21st of 2020, Dominion Energy provided a Revised Permit Application Strategy to conduct a Modified Removal Action (MRA) to DHEC. The Revised Permit Application Strategy provided a schedule for completing a permit application to the USACOE by June 30th, 2020. Dominion Energy indicated that to meet the June 30th, 2020 deadline, several design aspects will have to be streamlined which limits the potential landside operations access routes to the Central Access route.

The Department was under the impression that Dominion Energy had achieved more progress with the Permit Application Strategy tasks than indicated in the Revised Permit Application Strategy. Additionally, it appears that little progress beyond the No Rise Certification approvals has been realized. An Option 2 was presented in the Revised Permit Application Strategy that indicated that a "Completed" Permit Application could be submitted by September 30th, 2020 that could address outstanding items that could not be completed by the June 30th, 2020 deadline.

The Department is concerned that the Central Access Route was previously a point of contention to the property owners in the area. In an email from 2014, SCANA indicated that "the southern route eliminates most concerns received by USACE during the public participation period and that the route is being well received by adjacent property owners and other interested parties. SCANA is committed to the route and is anxious to construct the route."

In the Preliminary Removal Action Work Plan (PRAWP) of 2018, Dominion Energy indicated that the "northern and central/southern access options are being considered at this time." The PRAWP went on to state that "based on safety related concerns expressed during the public comment period, the initial route for access to the project work area was modified so that the project related traffic would be minimized in the Gist and Senate Street areas." Outside of

Figure 2-1 in the PRAWP, all other planning and design figures contemplate a southern access route.

The Department understands that the southern access route has its own set of challenges that must be overcome such as obtaining access, making road improvements, and the construction of a Culvert Crossing. The Department requests that Dominion have discussions with the neighboring residents and businesses as they try and work out the best route of access for this project.

In Component 1(vi) of the Permit Application Strategy, the UXO removal support plans (4 separate plans), the Archaeological Data Recovery Plan, SHPO/SCIAA (MOA) coordination, and other existing plans have previously been developed and/or approved. While these plans or coordination efforts may not be complete by June 30th, 2020 or September 30th, 2020, the alterations from the former project scope are not vastly different and the MRA project scope entails a smaller footprint. DHEC will assist similar to the previous MOU with USACOE Charleston Project Management Office to manage the UXO team out of Huntsville to review and approve the UXO plans, once Dominion has made contact with them and begun the process.

To conclude, the Department will grant an extension to Dominion Energy to submit a permit application to the USACE until September 30, 2020. The Department requests that with the extension progress must be made. Site progress should be documented in weekly progress reports submitted to the Department by email each Wednesday until September 30, 2020. The Department appreciates the efforts being made by Dominion Energy to meet the deadlines for a "Completed" Permit Application Submittal.

Sincerely,



Lucas Berresford, Program Manager
State Voluntary Cleanup Program
Division of Site Assessment, Remediation, and Revitalization
Bureau of Land and Waste Management

cc: File 52561
Myra C. Reese, EA Director
Greg Cassidy, BLWM
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