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April 28, 2017

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Myra Reece
 Director, Environmental Affairs
 S.C. Department of Health and Environmental Control
 2600 Bull Street, Columbia, SC 29201

**SITE ASSESSMENT,
 REMEDIATION &
 REVITALIZATION**

**Re: Evaluation of Proposed Congaree River Capping Alternative for Control of
 Coal Tar Sediments**

Dear Ms. Reece,

Attached please find an evaluation of the proposed "Sediment Capping and Institutional Control" cleanup alternative, which the Department of Health and Environmental Control (DHEC) has requested that the South Carolina Electric & Gas Company (SCE&G) pursue at the Congaree River coal tar waste site.

The Southern Environmental Law Center submits these comments of Randall Grachek, PE of NewFields on behalf of Congaree Riverkeeper. We hired Mr. Grachek to perform this analysis because he has over 30 years of civil and environmental engineering experience, with specific experience in water and wastewater engineering. Mr. Grachek has worked both as a consultant for companies remediating hazardous waste sites, and as a project manager at the U.S. Army Corps of Engineers, where he investigated waste sites and evaluated remedial action plans. As Mr. Grachek's CV demonstrates, he has participated in a wide range of projects where different actions—e.g. capping in place, natural attenuation, or excavation and disposal—were taken depending on site characteristics.

SCE&G has directed the process for determining the remedy at this site toward, in Mr. Grachek's words, a "foregone conclusion." SCE&G has consistently cited the technical and regulatory challenges posed by the complete removal alternative that DHEC and SCE&G initially preferred as an excuse to lessen the scope of the excavation, and eventually to abandon excavation in favor of a "cap." The "cap" SCE&G now proposes is in reality a geotextile fabric that does not prevent hazardous compounds from leaching into the river and groundwater. Based on Mr. Grachek's report, we speculate that SCE&G is motivated by cost considerations, and emphasize that the technical and regulatory challenges associated with the excavation alternative are surmountable.

Excavation of coal tar laden sediments is the only way to fully protect human health and the environment, and we believe that DHEC should demand further investigation of removal

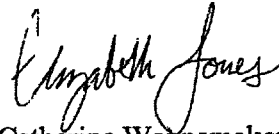
options. In addition, Mr. Grachek's analysis identified several additional gaps in the process for determining the appropriate remedy. In particular:

- SCE&G had collected only two water samples, and never analyzed water quality impacts following flooding or rain events;
- SCE&G has not conducted any fish or macroinvertebrate sampling;
- SCE&G has not outlined how it will protect the public from foot entrapment or other hazards caused by the riprap and/or articulated block it plans to set on top of the geotextile fabric; and
- SCE&G has not explored the possibility of using an impermeable barrier covered by a sand gravel cushion layer rather than a geotextile fabric.

We ask that DHEC require further investigation of these issues.

Thank you for your consideration of these comments. Please do not hesitate to reach out to us if you have any questions.

Sincerely,



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cc: Bill Stangler, Congaree Riverkeeper, crk@congareriverkeeper.org