



April 27, 2021

Mr. Paul Biery
Senior Project Manager
Dominion Energy South Carolina
220 Operation Way, MC C221
Cayce, SC 29033

RE: Unexploded Ordnance (UXO) Plans
SCE&G Fleet Maintenance Site (Congaree River)
Columbia, South Carolina

Dear Mr. Biery,

The State Voluntary Cleanup Program received the Final Work Plan for Munitions Response, Final Explosives Safety Submission, Final Diving Operations Plan, and the Diving Safe Practices Manual on February 26, 2021. The State Voluntary Cleanup Program requested DHEC's RCRA Federal Facilities section to review the UXO plans and they provided the following comments:

General Comments:

1. The ESS and WP are inconsistent in the use of the on-site Type 2 ATF&E explosives magazine. Specifically, the ESS states the magazine will be used to store donor charges (with consolidated detonations at the end of each day), while the WP states the magazine will be used to store acceptable-to-move MEC items for future consolidation and destruction (with donor charges being delivered and used same day). See comments 4, 8, and 10 below.
2. The documents do not address what effect, if any, the BIP procedure may have on the cofferdam design/integrity if determined the item is unacceptable-to-move. Further, a similar concern, will the location of a land-based demolition area have any similar effect on the cofferdam integrity.
3. With munitions cleanups in my section, we typically ask for the facility to NOT use the same consolidated detonation location so that they don't trigger the potential need for a RCRA emergency permit or RCRA thermal treatment permit. I would also ask to see the demolition area(s) located on a map and recommend they provide an explanation for why this location was selected.
4. Although this MEC/UXO Disposal response chain is consistent with multiple sites across the state, we typically recommend that facilities provide acceptance of that role from the responding entities to ensure concurrence (i.e. does Richland County Bomb Squad know about this plan and want to be the first agency called to respond if Titan needs assistance?).

ESS Specific Comments:

5. Sections 3.3 and 3.5 - The ESS states that donor explosives will be stored in an on-site Type 2 ATF&E explosives magazine and consolidated on land demolition shots will be performed at the end of the day. These statements are inconsistent with the language in the WP. Further, due to the planned TLM/water treatment design footprint (shown on Figure B-3), it is unclear how/where any potential MEC items will be treated as the MEC Container storage location is near/overlaps the TLM treatment footprint.
6. Section 6.5 and 7.2 – It is stated that no hazardous waste is anticipated for off-site transportation, treatment, storage, or disposal. I feel that this statement may be a bit misleading, since this munitions investigation and removal is being conducted to help DESC address TLM in the sediment/soil. A hazardous waste determination of any waste generated should ultimately be made by the generator (DESC). It is understood any MEC/MPPEH items will be treated on site prior to proper disposal. It does not address what will be done with the excavated sediment/soils/LTM during this effort.
7. Figure A-3 – How does the presence of high voltage power lines above/near the proposed magazine storage location affect the proposed location.

WP Specific Comments:

8. Sections 1.6 and 3.7.11 – These sections state a response by Department of Army emergency response personnel if not suspected RCWM or unidentifiable MEC/UXO is identified or suspected to be found. For consistency with the ESS and the rest of the WP, it is suggested this language be updated to U.S. Military EOD as it is uncertain which military branch EOD would respond.
9. Sections 3.7.9 and 3.7.13 – These sections regarding the MEC Holding Areas and Collection Points are inconsistent with the ESS. Section 3.7.13 – This section references the approved ESS regarding collection points. Section 3.7.9 – states the use of MEC Holding Areas. The ESS Section 3.5.2 states collection points may be used to temporarily accumulate MEC pending destruction at the end of the day using consolidated shots.
10. Sections 3.9 and 6.2 – These sections discuss IDW Mitigation and Decontamination and Disposal of Equipment. If generated, where will the IDW be contained until disposal with impacted sediment material? It is also uncertain how the decontamination process will ensure proper capturing of any impacted sediment material.
11. Sections 5.1, 5.3, 5.7, 5.8, 5.11.3, 5.12, and 5.14 - These sections are inconsistent with the ESS. These sections state that donor explosives will be delivered to the site in the quantities required on the day of the planned demolition operations and MPPEH will be stored in an ATF Type 2 Magazine. Further, the initial list of donor charges to be deliver (but not stored on site) is greater than the list of quantities of donor expected to be required to conduct the day's operation. If not stored on site, where will this initial delivery of donor explosives be stored?
12. Figure B-3 – How does this proposed MEC Storage Magazine location correspond to the planned water treatment design proposed in Joint Application Supplement Project Description Attachment C's Figure 5 of the conceptual design? Since MEC investigation/removal of the sediment area will be conducted after construction of the cofferdam and dewatering, it seems the location of the proposed MEC Storage Magazine in relation to the operational area will overlap (to include additional offices/storage trailers).
13. Appendix D – Generally, DHEC does not comment on APPs, although Section 19.6 states TITAN does not anticipate the use of drums/containers/tanks during activities under the PWS. Please see Comment 9 above. This statement also seems inconsistent that waste material from

equipment decontamination should be contained and disposed with the impacted sediment material.

Diving Operations Plan Comments

14. It is unclear if any additional PPE should be used during MEC investigation/removal due to the presence of TLM in the footprint of the cofferdams.

Please provide a response to these comments within 30 days of receipt. If you have any questions feel free to contact me at (803) 898-0910 or at cassidga@dhec.sc.gov.

Sincerely,



Greg Cassidy
State Voluntary Cleanup Program
Bureau of Land and Waste Management

cc: File 52561
Lucas Berresford, BLWM
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