



February 15, 2022

Mr. Thomas Effinger  
Director, Environmental  
Dominion Energy South Carolina  
220 Operation Way, MC C221  
Cayce, SC 29033

RE: Removal Action Memorandum  
SCE&G Fleet Maintenance Site (Congaree River)  
Columbia, South Carolina

Dear Mr. Effinger:

The State Voluntary Cleanup Program of the Division of Site Assessment, Remediation, and Revitalization has issued this Action Memorandum for the Congaree River Sediments Site on February 9, 2022. The Action Memorandum's purpose is to request and document approval of the proposed removal action and determine that it meets the National Contingency Plan (NCP) Section 300.415(b)(2) criteria for removal actions. The Department's final approval for the action will take place when the Modified Removal Action Work Plan is approved. Attached is a copy of the signed Action Memorandum.

If you have any questions feel free to contact me at (803) 898-0910 or at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Cassidy", is written over a light blue circular stamp.

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

cc: File 52561  
Lucas Berresford, BLWM  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region



## ACTION MEMORANDUM

To: Henry Porter, Chief *HP*  
Bureau of Land and Waste Management

From: Greg Cassidy, Project Manager *GC*  
State Voluntary Cleanup Section, Bureau of Land and Waste Management

Thru: Lucas Berresford, Section Manager *LB*  
State Voluntary Cleanup Section, Bureau of Land and Waste Management

Date: February 9, 2022

Subject: Request for Removal Action Huger Street Former Manufactured Gas Plant (MGP) Site, Congaree River Sediment Contamination Site  
Columbia, South Carolina  
BLWM File 52561  
PCAS # 5295

### I. Purpose

The purpose of this action memorandum is to request and document approval of the proposed removal action at the Huger Street Former Manufactured Gas Plant (MGP) / Congaree Sediment Site in Columbia, South Carolina. This site poses a threat to human health and the environment that meets the National Contingency Plan (NCP) Section 300.415(b)(2) criteria for removal actions.

### II. Site Description / Site History

#### A. Physical Location and Site History

The Former Huger Street MGP Site is located at 1409 Huger Street in Columbia, South Carolina. The Site is situated in the western portion of the City of Columbia, near the Congaree River as shown on **Figure 1**. Dominion Energy of South Carolina (DESC) owned two parcels of land totaling approximately 7 acres, which are referred to as Parcel "A" and Parcel "B".

Structures relating to both the former MGP operations and bus maintenance facility were generally situated on a city block (Parcel "A") which is approximately 5.88 acres in size and bounded by Huger Street to the east, Washington Street to the south, Williams Street to the west, and Hampton Street to the north. A 72-inch diameter concrete storm water drainage culvert passes through the site and discharges to the Congaree River at the outfall area located directly south of Gervais Street. This area is referred to as the Culvert Outfall Area. During Plant

operations waste material was transferred through a stream that bisected the property into the Culvert Outfall Area and ultimately into the Congaree River.

In June 2010, a tarlike material (TLM) was reported to DHEC. DHEC collected 3 sediment samples. Preliminary testing conducted on the material indicated it was consistent with material used in manufactured gas plants that operated in Columbia from the mid 1800's and ending in the 1950's. The predecessor companies to DESC operated the Manufactured Gas Plant, therefore DESC has been working cooperatively with DHEC to determine the extent of contamination at the site. The Area of Concern is approximately 2000 feet of the Congaree River along the Columbia side, between the Gervais Street and Blossom Street Bridges and illustrated in **Figure 2**.

## **B. Remedial Investigation (RI)**

DESC initially began remedial investigation activities with the Delineation Work Plan submitted to DHEC on September 16, 2010. DHEC approved the work plan on September 24, 2010 with assessment activities beginning in September 2010 and completing the first phase of Investigation in October 2010. The purpose of this investigation was to identify tar like material (TLM) in the Congaree River and determine the depth, width and length of contamination.

The investigation was conducted in 5 Phases. The Phase I Investigation began in September 2010 and concluded in September 2010, with a report submitted to DHEC along with a Phase II work plan on December 29, 2010. Phase II Investigation began in January 2011 and concluded in February 2011. The findings from this investigation were submitted to DHEC in June 2011 along with the Phase III work plan. Phase III Investigation began in June 2011 and was completed in July 2011. The findings were submitted to the Department in August 2011 along with the Phase IV work plan. Phase IV Investigation began in August 2011 and was completed in August 2011. The findings were reported to DHEC in September 2011. Phase V Investigation began in January and concluded in February 2012 with the report being submitted to DHEC on March 29, 2012.

During the course of investigation 244 sediment cores were collected using various sampling techniques. Samples were collected from 37 borings along the perimeter to determine the extent of contamination as well as 3 samples collected of the TLM.

The following compounds were identified as contaminants of concern for the site in the Congaree River:

- Benzene;
- Naphthalene;
- Benzo(a)pyrene;
- PAHs

### **C. Removal Evaluation**

Contamination at the Site is associated with by-products (i.e. coal tar) generated by the production of coal gas. These contaminants were discharged into the stream that feeds into the Congaree River, where the tar material settled. The purpose of this Interim Removal Action is to remove the contaminated sediment from an approximate 2000 foot area of the Congaree River between the Gervais and Blossom Street Bridges. The locations of all areas of removal are shown in Figure 3.

## **III. Threats to Public Health or Welfare or the Environment, and Statutory and Regulatory Authorities.**

The Department has determined that a release of hazardous substances has occurred at the Site and may present a danger to public health and welfare or the environment. In order to protect public health and the environment, it is necessary that action be taken to abate the release of hazardous substances from the site. The following NCP Section 300.415(b)(2) criteria are being met for this removal action.

### **A. Threat to Public Health or Welfare**

**Section 300.415(b)(2)(i)** - *Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants*

The Congaree River is used for recreation activities. The area of impact that is adjacent to a popular boat landing that is frequently used by the public. Fishermen and swimmers also have potential to be exposed to the contaminants if they come in direct contact with the tar like material that is mixed with the sediments.

### **B. Threat to Environment**

**Section 300.415(b)(2)(v)** - *Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.*

The Congaree River is a dynamic river and with the contamination present in the sediments storm events could potentially move contaminated sediments and expand the footprint of contamination further downstream.

## **IV. Proposed Actions**

### **A. Proposed Action Description**

DHEC's preferred cleanup alternative for the Congaree River sediments is Alternative No. 4 – Modified Removal of the TLM and Impacted Sediments. This alternative is the most protective of human health and the environment because it permanently removes the majority of the TLM and affected sediments and soils to the maximum extent possible.

The site contains some unique considerations that must be addressed during the course of the removal action. One issue is that the area of impact is also within the same footprint of where Confederate munitions were deposited by Sherman during the Civil War. This creates a two-fold concern during cleanup activities. The first concern is that potential unexploded ordnance must be evaluated to maintain worker safety. The second concern is the potential to preserve any historical artifacts that may be found in the river.

Another issue is that a cofferdam must be utilized because the river has a bedrock bottom that makes metal piling options infeasible. The Congaree River is a very dynamic river and is prone to flood. The cofferdam must be designed to withstand overtopping and be designed to recover from being overtopped.

The last challenge is that construction and deconstruction of the cofferdam must be conducted within limited timeframes of the year. This restriction is to limit disruption to fish bedding within the river.

In order to meet the No Rise Certification needed to obtain the Nationwide 38 Permit, the elevation and footprint of the cofferdam is limited. The layout chosen encompasses two separate areas within the river that are the most accessed and where the majority of TLM volume exists. Approximately 70-75% of the total TLM within the river would be removed from the Congaree River. Areas of TLM that will remain will be areas with minor thicknesses of TLM, TLM that is covered with additional sediment from the 2015 flood event, and TLM that is away from the shoreline or in deeper water where the risk of dermal contact is minimal. Because of the scope of work involved, the cleanup would be conducted in multiple phases and take approximately 5 years to complete. Although the affected area would remain off-limits during the cleanup, official access points to the river would not be restricted.

## **B. Applicable or Relevant and Appropriate Requirements (ARARs)**

Federal ARARs proposed for the removal action are the Resource Conservation and Recovery Act (RCRA), Occupational Safety and Health Act (OSHA), the Hazardous Material Transportation Act (HMTA), Nationwide 38, Underwater Antiquities Act, and the Offsite Rule. State ARARs include the Pollution Control Act and the South Carolina Hazardous Waste Management Act. These ARARs will be followed during the removal action.

Federal and state laws govern activities in (or affecting) navigable waters, therefore various permits will be required for the Removal Action. The United States Army Corps of Engineers and DHEC have established a joint application process for activities requiring both federal and state reviews or approvals. The permit processes requires DESC to submit detailed information for the project addressing, but not limited to, the following:

- Potential impacts on public navigation practices within the Congaree River;
- Temporary dam construction design and operation;
- Techniques for the temporary removal of water, also known as dewatering;
- Land disturbance activities;
- Management of impacted water and sediments from the river and uplands;
- Impact to wetlands (as applicable);

- Historic impacts and recovery of historic artifacts (as applicable and through approvals from the State of South Carolina Historic Preservation Office and/or South Carolina Institute of Archeology and Anthropology); and
- Endangered or threatened plant and animal species (as applicable and through approvals from National Marine Fisheries, the South Carolina Department of Natural Resources and/or United States Fish and Wildlife Agencies).

DESC applied for verification of the Department of the Army permit application (SAC-2011-01356) under Nationwide Permit 38 on September 30, 2020. On December 10, 2021, DESC received verification from the Department of the Army that the Nationwide Permit 38 was authorized. On December 23, 2021, DHEC issued an Authorization to Construct Under the General Permit (SC GP-2009-001).

### C. Engineering Evaluation / Cost Analysis

A detailed Engineering Evaluation and Cost Analysis was submitted to the Department on January 15, 2013. The EE/CA evaluated 4 cleanup alternatives for the site. Alternative 4 from the EE/CA was modified in 2021 to provide an alternative that would allow floodplain restrictions to be maintained. This Modified Removal Alternative was presented to the public on November 17, 2021. These alternatives are outlined in Table 1 below:

<b>Table 1 - Cleanup Alternatives Evaluated by DHEC &amp; Estimated Cost</b>
1. <b>No Action</b> – Leave the TLM in place. This option is primarily used as a baseline for comparison with other options. <b>Estimated Cost: \$0.00</b>
2. <b>Monitoring and Institutional Controls</b> – Leave the TLM in place and restrict access to the area by placing signs in and along the river and installing a chain link fence along the eastern shoreline. 30-year annual monitoring of sediment conditions in and downstream of the affected area would be performed to detect any movement of the TLM. <b>Estimated Cost: \$677,000.00</b>
3. <b>Sediment Capping and Institutional Controls</b> – Leave the TLM in place and “cap” it with a physical barrier on top of the sediment. The barrier would be designed to withstand routine flooding and would most likely include a geotextile fabric overlaid by riprap stone. Institutional controls and monitoring similar to Alternative 2 would be included. <b>Estimated Cost: \$7,681,000.00</b>
4. <b>Modified Removal of the TLM and Impacted Sediments</b> – Physically remove the TLM from the river at the most accessible areas. This option would include construction of a temporary dam and dewatering of the affected area so that the TLM and sediments can be removed and taken to a licensed off-site facility for disposal. The ecological environment would be restored upon completion. <b>Estimated Cost: \$18,529,089.00</b>

## **V. Expected Change in the Site Conditions Should Action be Delayed or Not Taken**

If the recommended action is not performed or is delayed, the primary sources of contamination will remain in place and continue to pose a risk to people who may come into direct contact with contaminated sediments.

## **VI. Public Participation**

Public participation activities have been consistent with the Department's Public Participation Guidelines. DHEC has held a series of public meetings to inform the public of the ongoing investigations and remedy evaluation. The Department held a public meeting on November 17, 2021 to present the modified alternatives evaluated to the public and provide the opportunity for public comment on the proposed remedy. The initial public comment period ran until January 15, 2021 but DHEC extended it until February 22, 2021. An additional meeting was held with the nearby residents on February 8, 2021. The public comment period closed on February 22, 2021. DHEC received multiple comments on the proposed remedy. The comments as well as DHEC's responses are included in Appendix A. The comments and responses are summarized in the Responsiveness Summary section.

## **VII. Responsiveness Summary**

DHEC received 11 comments on the proposed Modified Removal Action for the site during its Public Comment Period from November 17, 2020 until February 22, 2021. Most comments came from local residents.

The comments focused on alternative routes to the proposed Senate Street proposal, property value concerns, and the potential for additional traffic and noise during construction. One of the resounding concerns was the amount of truck traffic that would occur during this action.

DHEC responded to all of the comments and invited several of the community members to join the stakeholder group. After several meetings the community had a better understanding of the details of the project and were much more supportive of it moving forward. The comment letters as well as DHEC's response letters are included in Appendix A.

## **VIII. Outstanding Policy Issues**

None.

## **IX. Enforcement**

On August 19, 2002, SCANA Corporation (SCANA), now DESC, [on behalf of its primary subsidiary, South Carolina Electric & Gas (DESC)] and the South Carolina Department of Health and Environmental Control (SCDHEC) executed a Responsible Party Voluntary Cleanup Contract (VCC) #02-5295-RP for the Columbia Fleet Maintenance Site, also referred to as the

former Huger Street Manufactured Gas Plant (MGP) facility. The VCC lists specific requirements that DESC must perform to complete the remedial investigation and remediation at the site.



## X. Response Decision Summary

Information on the Congaree River delineation can be found in the Project Delineation Report dated March 29, 2012. This includes all the data collected during the investigation of the river. Additional information can be found in the EE/CA that outlines the alternatives evaluated for cleanup of the site. Information on Alternative 4: Modified Removal of the TLM and Impacted Sediments can be found in the Conceptual Plan for a Modified Removal Action available on the web. The Administrative Record is available on the web at <http://www.scdhec.gov/environment/CongareeRiver/>.

This decision document represents the selected removal action for the Huger Street Former Manufactured Gas Plant / Congaree River Sediments Site that has been developed according to CERCLA, as amended by SARA, and not inconsistent with the NCP. This decision is based on available information contained in the Administrative Record for the Site.

Conditions of the site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action.

APPROVE:

  
\_\_\_\_\_  
Henry Porter, Chief  
Bureau of Land & Waste Management

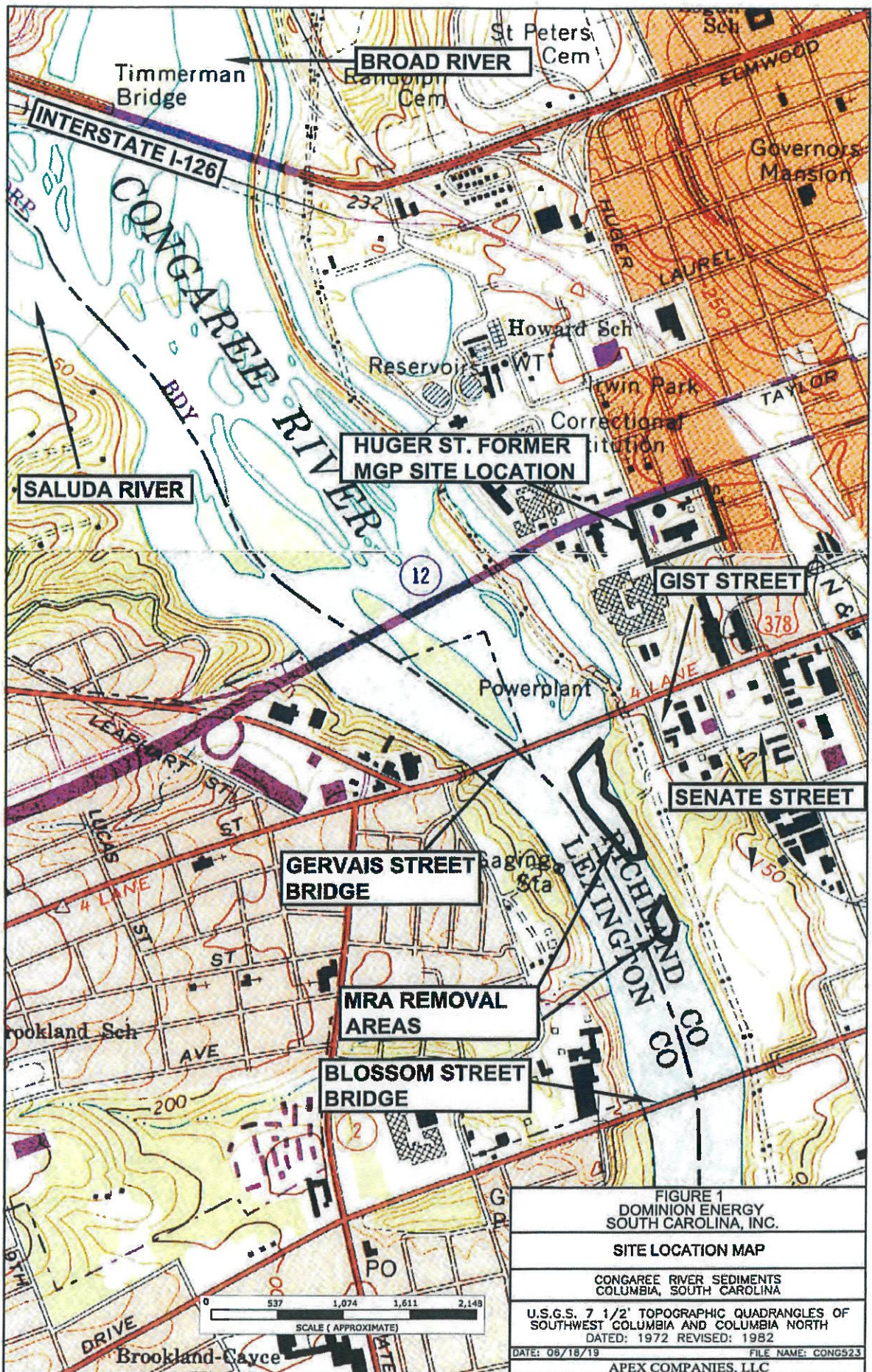
Date: 2-9-2022

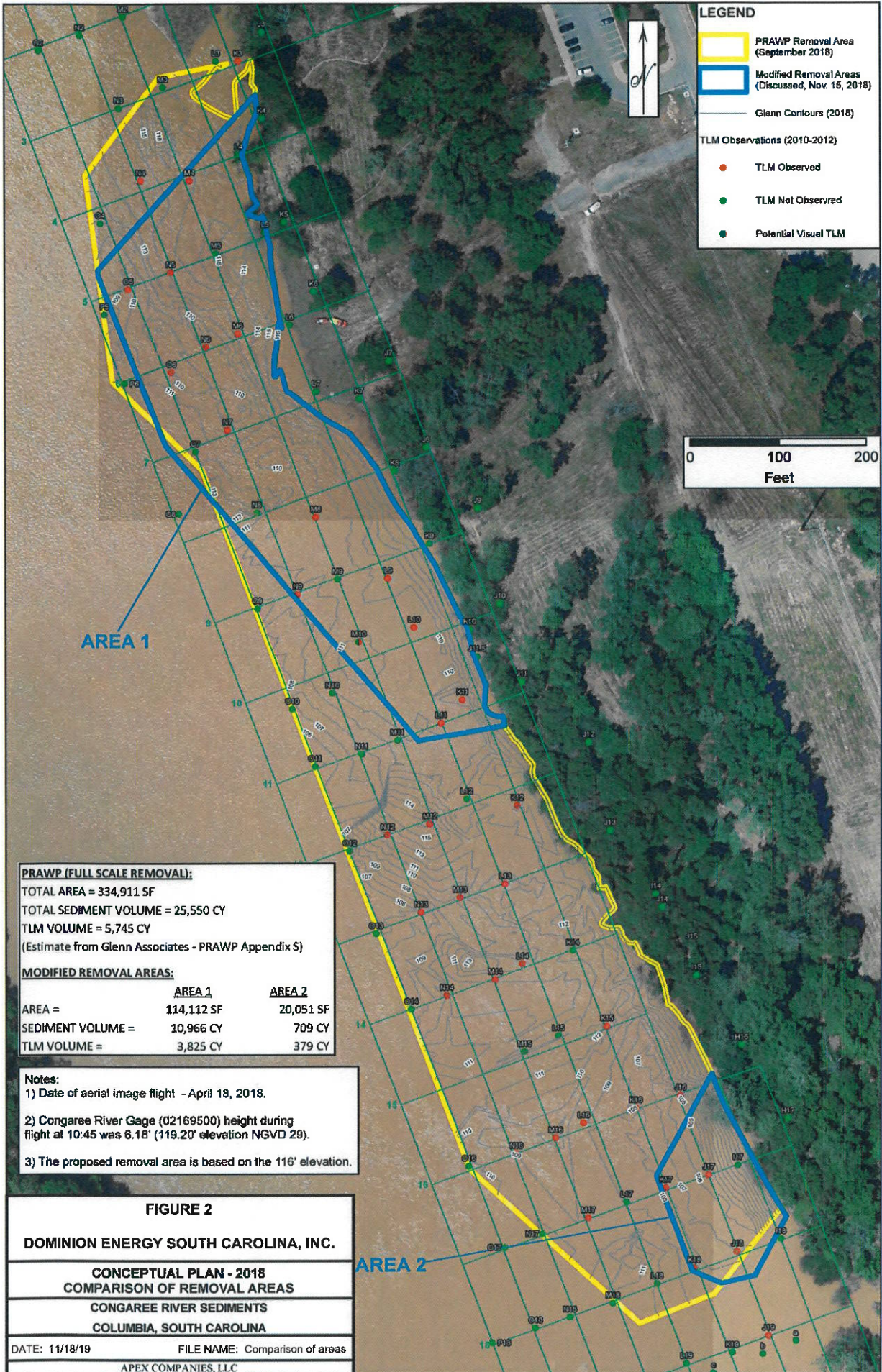
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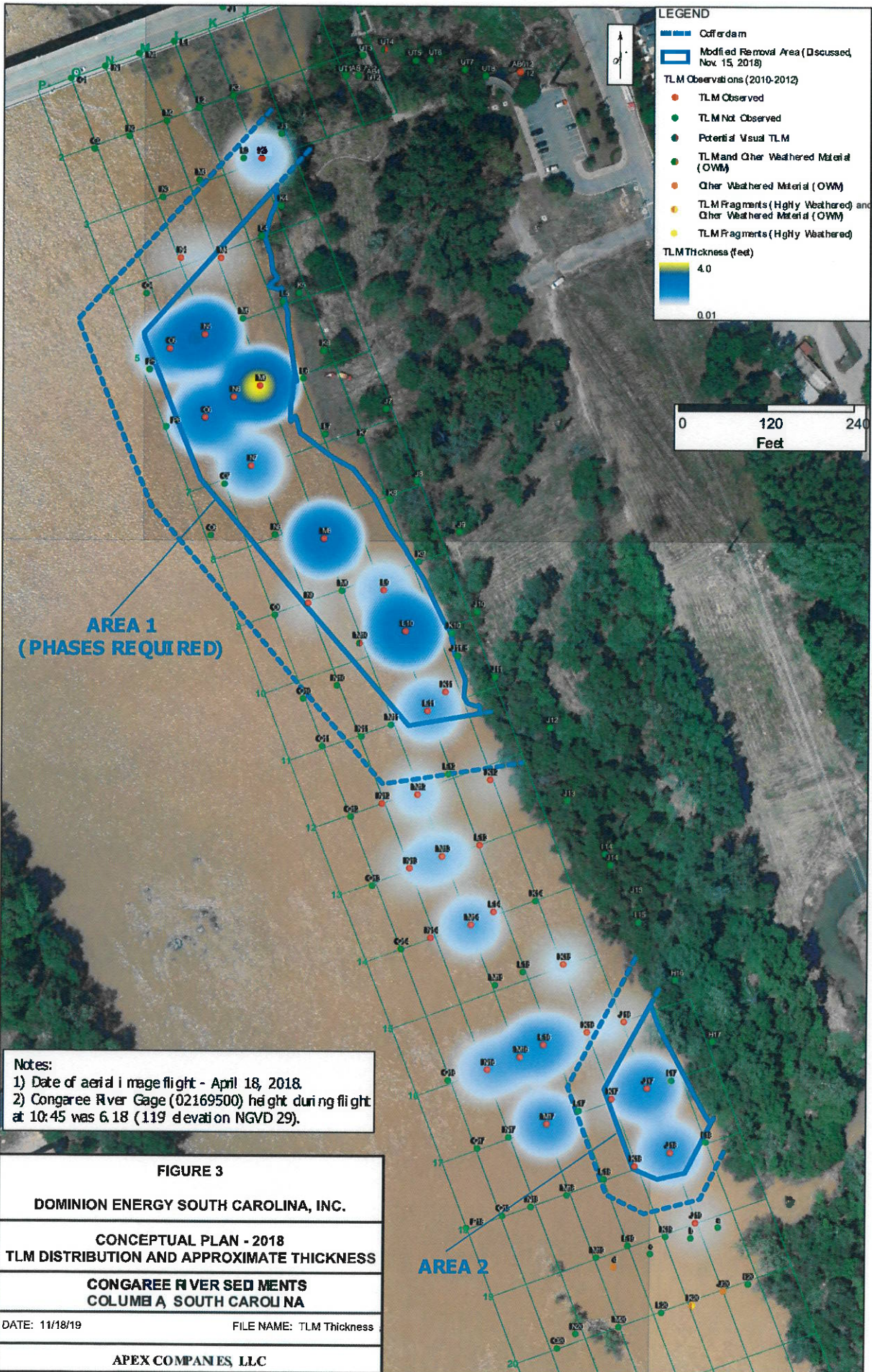
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Henry Porter, Chief  
Bureau of Land & Waste Management

Date: \_\_\_\_\_

## FIGURES







Notes:  
 1) Date of aerial image flight - April 18, 2018  
 2) Congaree River Gage (02169500) height during flight at 10:45 was 6.18 (119 elevation NGVD 29).

**FIGURE 3**  
**DOMINION ENERGY SOUTH CAROLINA, INC.**  
**CONCEPTUAL PLAN - 2018**  
**TLM DISTRIBUTION AND APPROXIMATE THICKNESS**  
**CONGAREE RIVER SEDIMENTS**  
**COLUMBIA, SOUTH CAROLINA**  
 DATE: 11/18/19 FILE NAME: TLM Thickness  
**APEX COMPANES, LLC**

## APPENDIX A

## City Club Homeowners Association

February 20, 2021

Mr. Greg Cassidy  
Department of Health & Environmental Control, State Voluntary Cleanup Program  
2600 Bull Street  
Columbia SC 29201

Subject: **Congaree River Coal Tar/Sediment Cleanup; Public Comment**

Dear Mr. Cassidy:

This letter is to express the City Club neighborhood's deep concern with the current direction of the proposed coal tar cleanup project. We City Club officers request that the USACE permit application (sometimes referred to as Alternative 4a) be withdrawn until a fuller and more structured analysis of options is completed; including formal consideration of and responses to concerns from affected neighbors (key stakeholders).

Alternative 4A is a hybrid approach that would involve an elaborate, but partial, cleanup operation of unknown years' duration. The decision to request Alternative 4A was the result of such flawed planning process that a formal re-evaluation of the project is now necessary.

The initial engineering evaluation (EE/CA) claims to be an objective comparison of various action alternatives and led to various studies that examined the impacts of the project on the river and historic resources, but not the impact to the shore or the neighboring community. It has been asserted that public opinion led to Alternative 4. Regrettably, City Club early opinions were based on false information until just recently, but after the permit application was filed.

We were pleased that Dominion agreed to construct a temporary access road from Blossom Street to the excavation site. This "southern route" would eliminate the need to use Senate Street for heavy construction vehicle traffic. Public opinion within our community was thereby shaped by the perception that Dominion had responded to our community's greatest concern.

At a presentation for City Club at Senate's End in early 2019, Dominion displayed mapping of the southern route. A month later, at the State Museum, the southern route was presented to the public. Later in 2019, DHEC gave a presentation in the City Club Congaree Room in which Lucas Beresford again stated that the heavy truck traffic would use a temporary haul road from the site to Blossom Street (the southern route). Your reply to Charlie Leedecker's letter of February 12<sup>th</sup> stated: "*In June [2020], DHEC was notified by the property owner that the property needed for the southern access route was no longer available ... DHEC requested Dominion Energy let the City Club folks know that the southern access route was no longer available. Understanding that this change created more impact for the City Club residents, ....*" But it was not until the November 2020 virtual meeting that Dominion admitted, in public forum, that the southern route had not been available since 2017. The agreement may have expired even earlier, as stated in your February 12<sup>th</sup> reply: "*Shortly after the flood of 2015, SCANA's access agreement with the property owner ran out.*" This does not reflect well on commitments to transparency and suggests a restart to the alternative analyses.

Please suspend the permit application, pending completion of a professional, independent assessment of various alternatives, based on consideration of the benefits to and impacts of each alternative and each key stakeholder. This study would be modeled as an Environmental Assessment (EA) or Environmental Impact Statement (EIS) as defined by the National Environmental Policy Act (NEPA).

During Monday night's meeting, you heard many expressions of concern regarding the impacts of noise and traffic on property values and quality of life from the, so far, unknown project duration. When asked whether Dominion has any plan to mitigate these impacts, none were presented, and they said: "we can't think of any." Dominion did verbally acknowledge potential structural damage from the construction traffic would be remedied; written, record assurances are requested should this Alternative goes forward. A formal EA or EIS should more fully address these issues and develop mitigation plans.

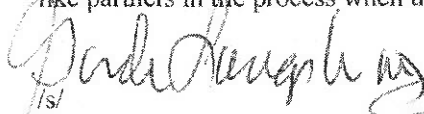
We heard Monday night, there is no plan (or intention to develop a plan) to mitigate the impact on our immediate and longer-term property values of years-long construction traffic. We note that the EE/CA specifically cited negative impacts to real estate values for properties along the riverfront as one criterion for evaluating the original alternatives. We are only asking that full consideration be given to the project impacts on our community, based full information and study (e.g., traffic study) results.


Traffic is the main, but not the only, concern. It is asserted that Senate Street is the only truck route option, yet the traffic study has not yet been finalized by Dominion or sent to DHEC. This further illustrates that the permit application is premature, submitted without a full consideration of one of the most negative impacts of Alternative 4A; a "pre-decisional" posture that violates the best practice principles of environmental planning.

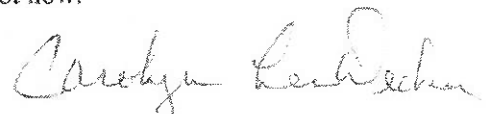
The record schedule in the DHEC presentation seems unrealistically short. The actual time needed for completion of the TLM removal will be influenced by important unknown factors (e.g. fluctuations in the river hydrology, archaeological deposits, ordnance, cofferdam topping, etc.). As part of the formal evaluation of alternatives, we request that the Alternative 4A plan receive an independent engineering feasibility evaluation.

We do not believe that an application delay to consider all stakeholder concerns should be of concern, as the TLM poses no immediate threat to environmental quality or human health and safety.

There is widespread concern about the prospect of construction traffic on Senate Street and contiguous industrial activity that will last several years, and their even longer-term impact on property value. We felt like partners in the process when the southern route was adopted, but not now.

  
Gordon Langston, MD  
President

  
Jay McKay, JD  
Vice President

  
Carolyn Leedecker  
Secretary

cc: City Club Residents  
Amy Cappellino, USACE, ([Amy.e.cappellino@usace.army.mil](mailto:Amy.e.cappellino@usace.army.mil))  
Mayor Benjamin and Columbia City Councilmen McDowell and Duvall  
Seth Rose, State Representative, District 72 ([sethe.rose@gmail.com](mailto:sethe.rose@gmail.com))  
Richard Harpootlian, State Senator, District 20 ([RichardHarpootlian@scsenate.gov](mailto:RichardHarpootlian@scsenate.gov))  
Barton Walrath, President, Vista Neighborhood Association ([wallycom@aol.com](mailto:wallycom@aol.com))





May 6, 2021

Dr. Gordon Langston  
City Club Homeowners Association  
1110 Gist Street  
Columbia, SC 29201

Re: Comments Submitted on Behalf of City Club Homeowners Association  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Dr. Langston,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 20, 2021, comment letter submitted on behalf of the City Club Homeowners Association. We appreciated the invitation to discuss this project with City Club residents on February 8, 2021.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Congaree River Sediment Stakeholders  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM  
Donna Moye, BLWM

February 13, 2021

From: Paul G. Gaffney II

To: Mr. Greg Cassidy, South Carolina Department of Health and Environmental Control

Subj: Public Comment on the Congaree River Tar-like Material (TLM) Cleanup, modified plan

General:

- While a modified plan (sometimes called Alternative 4a) was sent to the US Army Corps of Engineers (USACE) in September 2020, a public hearing to describe the modified plan was not held until November. The November public hearing caused enough concern by one community (City Club), presumably a key stakeholder, to schedule another public meeting on February 8, 2021. The public comment period has been extended to February 22.
- Alternative 4a focuses on the in-river clean-up operations; public meeting slides neither address truck traffic, shoreside construction/infrastructure nor credibly estimates the duration of the clean-up operation. Only upon questioning were some plans revealed regarding the movement in/out of construction materials and TLM.
- Upon review of the DHEC public meeting slides, only a gross timeline is presented that does not fully explain the likely weather and river impacts on the duration of construction; derivative extensions of construction traffic and TLM removal traffic are not presented on the record. Just based on recent river conditions records, one can estimate that the project could extend years beyond the timeline presented to the public. That such information is not a part of record briefings calls into question the credibility of Alternative 4. The duration of the project is just not credibly estimated.
- Alternative 4a is not ready for federal review and should be retrieved until key questions (in-river and ashore) can be answered, negative impacts highlighted, and mitigation of those negative impacts examined. Further, that re-analysis should be fully and forthrightly vetted with the key stakeholders including impacted neighbors.
  - Moreover, the EE/CA that purportedly sets up Alternative 4a does not address the impact of even a short term (3 year) construction/clean-up/de-construction period on property values pre/during/post clean-up. Notably, in the 3-5+ year clean-up period (starting once it is publicly announced) real estate activity is likely to drop, if not home values themselves.
  - While Dominion said “they were sorry” about the impact to property values, they could “not think” of a remedy, nor did they mention any compensation for home value loss. They only mentioned repair of damage that they may cause.

Discrete issues:

- While traffic was discussed in public meetings (not on record slides, and only upon live questioning), it became apparent on February 8<sup>th</sup> that the traffic study is only in draft form and has not been released to DHEC. Yet, Alternative 4a is in the hands of USACE. Perhaps the USACE does not care about shoreside impacts, but DHEC should.
  - Further, mention was made of the need to do roadbed core sampling to determine if the current roadbed can stand-up to the expected truck loading. Such coring information is not in the draft traffic study.

- Further, it became apparent in the February 8<sup>th</sup> public meeting that Dominion experts were confused in making some traffic statements. First, they explained that large semi-tractor/trailer turns off Gervais onto Gist required a wide swath disrupting commuter traffic. While on the face of it that seems reasonable, later we find that in the plan trucks never travel across the Gervais bridge or on Gervais Street, thereby making the Gervais-Gist turn issue irrelevant. The Dominion expert was unable to explain the impact of wide turns onto busy Huger Street.
  - Note: a back-up slide presented did not reflect the current proposed truck route. A reflection of the cavalier approach to the truck traffic issue.
- Further, the Dominion experts never responded when asked about the rather recent narrowing of Senate Street near the Girl Scout HQ, nor were Dominion or DHEC aware of the widely reported plans to build a long-stay hotel on the southeast corner of Senate-Huger while the clean-up is underway. One wonders if the street narrowing or hotel construction are in the traffic study.
- Further, while a traffic study is not yet available, one briefer explained that a reason Gist was not considered was because so many cars are parked there. It is not clear how their logic would change if residents who live on Senate Street started parking in front of their homes. Of course, we now know that the Gist explanation is not relevant for reasons discussed above.
- Further, on questioning over the truck traffic volume there were several, uncoordinated answers. First, a live estimate was presented (no record data); later discussion by Dominion and DHEC revealed that most truck traffic would be in the construction/deconstruction phases. The pace of truck traffic was also only loosely described. This was the first time that the public had heard the trucks would be long tractor-trailers. Dominion, while asked, neither discussed the kind of traffic that would be necessary to prepare the shoreside property and then set up the shoreside buildings and fencing, nor delivery of excavation and processing equipment or when all of that non-river work would start/finish. Access to the City parking lot on Gist was not mentioned.
- Extend Senate to the waterline. The public briefing mentioned (not on a record slide) the need to improve the roadbed on the Senate extension from Gist to the waterline. Such infrastructure improvements, even temporary, in a wetland may require their own commentary and approvals. Such an improvement's future status, after clean-up, was not discussed. Further, the briefers mentioned constructing branches off the Senate extension to move excavation equipment up and down the shoreline. Currently, there is a bluff from the tree line to the waterline that will likely require removing trees to make a slope that can be navigated by excavation equipment. This too seems to be a wetlands commentary, approval and restoration issue. This may have been fully thought through but was not described. Unfortunately, no public record slides discuss any truck traffic or shoreside infrastructure issues.
- Over-topping of the cofferdam. The briefers admit that this is a real issue even for an ~18-foot high cofferdam. Such a design would have been over-topped at least 5 times in 2020; an example they shared. Three issues remain, perhaps for USACE and for DHEC:
  1. Each time an over-topping is forecast excavation equipment will need to be removed thereby adding time to the project.
  2. Each time an over-topping occurs there is strong likelihood that LTM particles disturbed mid-excavation will wash out into the river. An interesting issue in that in some harbor construction scenarios efforts are made to minimize disturbing sediment and thereby minimizing the release of previously undisturbed toxic materials. This

convention probably led the USACE to approve the "capping" option. How will the free TLM particles be confined to the cofferdam during a serious over-topping?

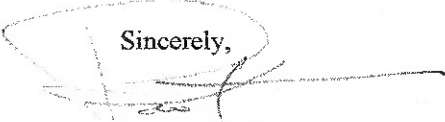
3. Each time an over-topping occurs, the area behind the cofferdam will hold water with disturbed, suspended sediment (likely with TLM). We have not seen the plan to safely de-water the area behind the cofferdam. This is an issue in some construction projects and when repairing bridge foundations (see USACE-approved processes used by a company called Aqualete of Ocean Twp, NJ, and perhaps others). One presumes that water behind the cofferdam will not simply be dumped into river or sprayed on the adjacent shoreline. Both are environmental insult possibilities that require public review. The neighboring population will be concerned about the, heretofore undiscussed, de-watering process.

- Cost to the rate payer. The current estimate is >\$18+mm to remove ~500,000 cubic feet of sediment and TLM (2.6 acres x 5 ft deep in Area 1) over 3 to 5+ years. This is such a big cost that adding some new funding upfront to gain access to and construct a better route may be less expensive and swifter in the end.
- Truck traffic and shoreside facilities plans to address clean-up Area 2 are not clear. Will Senate also be the truck route for Area 2?
- This novice cannot determine if this is a "Superfund" site from the public briefing material, but it seems strange that a federal agency, USACE or EPA, would permit such disruption, with such a loose timeline, for such a rate-payer burden, to only remove 70% of the TLM. What federal official would want to associate his/her name or risk his/her reputation with a 70% solution? Further, NEPA processes are not referenced in any public slide. Jurisdictions should be clarified.
- Up-to-date information about the former "southern route" was withheld for several years. It is disappointing that public record briefing materials do not mention the loss of the "southern route" and live discussions were silent on this key issue until just a few months ago. Further, the public is unaware of what remedies (financial or geophysical) have been/might be proposed to regain the "southern route" permissions. This goes to credibility and forthrightness.

The permit application process was not rigorous enough and ignores traffic/shoreside/home value mitigation. The permit application should be withdrawal until all stakeholders impacts are addressed.

Thank you for keeping the door open for these comments.

Sincerely,



Paul G. Gaffney II  
Vice Admiral, USN (Ret.)  
1112 Gist Street  
Columbia, SC 29201

Cc: President City Club HOA



May 6, 2021

Mr. Paul G Gaffney II  
1112 Gist Street  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Gaffney,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 13, 2021 and February 19, 2021 comment letters.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

Paul and Melissa Harrill  
317 Senate Street  
Columbia, South Carolina 29201

February 22, 2021

Via email (cassidga@dhec.sc.gov)

Mr. Greg Cassidy  
Project Manager  
State Voluntary Cleanup Program  
S.C. Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

Re: Congaree Coal Tar Cleanup Impact on City Club Neighborhood

Dear Mr. Cassidy:

I am informed that you are the person to whom I should communicate any comments regarding the coal tar removal project in the Congaree River. My wife Melissa and I are residents of the City Club, and our townhome is located directly on Senate Street. We moved into our townhome in March 2019. We were drawn to the beautiful City Club neighborhood by the attraction of quiet "downtown" living and the proximity of the Congaree River.

I am writing you to express Melissa's and my extreme concern over the lack of consideration we and our neighbors are being given by DHEC and Dominion in the current plans for this project. I have heard about the "Southern Route" that was in place before we moved into the neighborhood. It is my understanding that route was acquired and going to be used, at least in part, for the purpose of lessening the impact on the City Club neighborhood. It is only in the last few months that my neighbors and I have learned that the Southern Route is no longer available due to the expiration of the option on that property. I believe it was gross negligence for DHEC and Dominion to allow the option on the Southern Route to expire, while the project was in flux after the floods of October 2015.

We are now told that, as a result of the expiration of the option on the Southern Route, the current plan is to send all of the heavy industrial traffic associated with the coal tar removal and cofferdam construction up and down Senate Street directly in front of our home. At a virtual meeting with DHEC and Dominion representatives on February 8, 2021, we were informed that during the multiple month construction of the proposed cofferdam, we could expect a very large truck to pass by our house on Senate Street an average of every 15 to 20 minutes. This is not acceptable! The noise, vibrations and disruption of the industrial traffic will surely be a nuisance that will disrupt the use and enjoyment of our homes and our lives for at least three months, not to mention the additional years of traffic during the coal tar removal process and then the restoration process.

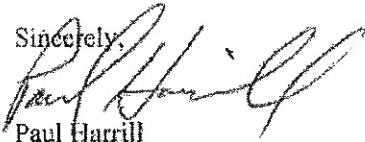


While we appreciated the opportunity to attend that virtual meeting earlier this month, I was stunned by some of the answers to questions. For example, I asked what, *if any*, actions in regard to the project are being taken to lessen the impact upon the City Club. The representatives on the call quite candidly responded that there were none and "we wish we had a better answer." It is not enough simply to tell us "we understand that the City Club is taking the brunt of the inconvenience and impact created by this project." I think Dominion and DHEC need to sharpen their negotiating skills and perhaps open Dominion's wallet in order to secure the rights to the Southern Route again. If that is not possible, I would like very detailed information about the reason that is no longer a possibility.

At my request, Tom Effinger was kind enough to send me a copy of the Congaree River Remediation Project Initial Pavement Assessment that was submitted to DHEC late last week. While I am by no means trying to direct traffic toward my neighbors on Gist Street, the report contains inconsistencies worth noting. For instance, the report recommends avoiding use of Gist Street to reduce the impact to the entrance and "street parking" for the City Club residents. When recommending the use of Senate Street for all loaded industrial truck traffic, the report fails to mention the "street parking" that the residents on Senate Street use. The loss of our street parking along Senate Street for unknown months and/or years will be yet another significant and unacceptable impact upon us.

Finally, I want to address what should probably be the first consideration – the wisdom of disturbing the coal tar that has lay dormant in the river for 70 to 100 years. It is our understanding from the DHEC presentation that the coal tar is now buried under approximately 5 feet of sand and silt. While I am sensitive to environmental concerns, especially regarding the river and our water systems, there is no information about which I am aware that suggests the coal tar is causing any imminent or likely environmental impact on the river system. It seems reactionary to dump many tons of rocks and sand into the river to create a cofferdam that will re-route the Congaree River, then dig through 5 feet of sand and silt, disturb potentially dangerous civil war munitions and *then* disturb the dormant coal tar, and remove only *some* of the coal tar. Logic seems to dictate the "No Action" alternative is the correct course. Instead, DHEC essentially has put to a popular vote among unaffected citizens whether our homes and lives in the City Club will be disrupted for this multi-year project. Please reconsider the alternatives or develop a way to lessen the impact on the City Club, especially those of us that live on Senate Street. Thank you.

Sincerely,



Paul Harrill



May 6, 2021

Mr. Paul Harrill  
317 Senate Street  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Harrill,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 22, 2021, comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's

inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

February 15, 2021

Mr. Greg Cassidy  
Project Manager, State Voluntary Cleanup Program S.C. Dept. of Health &  
Environmental Control 2600 Bull Street  
Columbia SC 29201

Dear Mr. Cassidy:

Thank you for hosting the February 8 City Club Community Meeting concerning the Congaree River Coal Tar/Sediment Cleanup. Your Powerpoint pdf provided an adequate background of the issue and proposed remedy; however, consideration of disruptive impacts on City Club homeowners during the proposed multi-year project was missing.

The impacts concern the overlapping areas of traffic safety, home values, and quality of life for us homeowners. Since the 2021 events in your Alternative 4A Timeline make no reference to addressing these concerns, the public comment period must be extended to allow for further dialogue on safety, recourse avenues for property damage, mitigation of noise, dust, and dirt, parking nuisances, and clarification of responsible parties, at a minimum. One would hope that a \$19 million public project over an open ended-multi-year completion span would provide some care provisions for those who will live with it every day.

I respectfully request that the public comment period be extended by at least three months in order to address the issues mentioned above.

Sincerely,



Edward H. Fetner, III  
311 Senate Street  
Columbia, SC 29201

cc:

Mrs. Rebecca McMillan, City Club Liaison to the Tea Removal Project  
Dr. Gordon Langston, City Club HOA president  
Rev. Edward H. McDowell, Jr., Columbia City Council member, District II.  
Mr. Howard E. Duvall, Columbia City Council member, At Large  
Mrs. Allison Terracio, Richland County Council member, District 5  
The Honorable Seth Rose, SC State Representative, House District 72  
The Honorable Richard A. Harpootlian, SC State Senator, Senate District 20



May 6, 2021

Mr. Edward Fetner, III  
311 Senate Street  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Fetner,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 15, 2021 comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM



*Friends of  
Congaree  
Swamp*

PO Box 7746  
Columbia, SC 29202-7746

January 16, 2021

Lucas Berresford  
SCDHEC BLWM-State Voluntary Cleanup Program  
Office of Environmental Quality Control  
Water Quality Certification and Wetlands Program Section  
2600 Bull Street  
Columbia, SC 29201

Dear Mr. Berresford,

On behalf of Friends of Congaree Swamp, I would like to offer the following comments and questions on the Modified Removal Action to construct cofferdams and remove tar-like material and river sediments from the Congaree River near the Senate Street landing and points downstream.

Has there been a study of what will happen to the remaining contaminated plumes upon removal of adjacent sediments—will they migrate toward the shore, especially at Site 2? Much of the justification for not removing these sediments relies upon their distance from shore; if they were to migrate closer to shore, the sediments could have an impact upon recreational users, in addition to posing an existing and continuing hazard to water quality and aquatic life.

Attachment K (located in Attachment C-Part 5 on the website) includes summary information about the impacts of cofferdams at Site 1 and Site 2, measured by change in floodplain width and stage height for various flows. Would it be possible to see the analysis for cofferdams that would remove additional parts of the plume? It was indicated that removal of other sections of the plume would have too severe an impact on the opposite shoreline, and it would be useful to see the analysis and coffer dam design that led to that conclusion.

Attachment C (Project Description) claims that the presence of shortnose sturgeon in the project area is “anecdotal”. A substantial body of research literature on Shortnose Sturgeon, *Acipenser brevirostrum*, indicates that *A. brevirostrum* spends a significant portion of the year in the project area, and spawns downstream of the area. A 2004 SCDNR report studied a group of 16 sturgeon released in Lake Moultrie; of that total, 11 remained in the Santee-Cooper Reservoir System; 7 of these 11 fish moved up the Congaree River, and 5 of these 7 traveled all the way up to Columbia. Collins et al.

(2003) notes that shortnose sturgeon eggs have been collected on a gravel bar south of I-77, indicating spawning activity in the Congaree River not far downstream of the project area.

As reported in a 2007 study, 14 of 24 sturgeon tagged in upper Lake Marion in 2006 were located by hydrophone receivers in the Congaree River over the course of the study. Of these 14, 11 traveled at least as far upstream as the gravel bars downstream of I-77. Most of this upstream movement and activity occurred in late February and March of the study years.

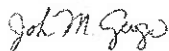
Attachment C indicates that mussels will be removed from the cofferdam footprints and relocated to another area. In addition to mussel relocation, we would request a restoration effort to reintroduce freshwater mussels in the project area.

The analysis of sediment layers appears to be outdated, particularly in light of the substantive February 2020 flood. We would request that a new study be conducted to confirm that removal efforts reflect the current state of sediment deposition.

Attachment C indicates that 975 linear feet of shoreline could be impacted by activities, particularly if sediments need to be removed right up to the riverbank edge. Attachment P instead indicates that there will be an impact of 1300 linear feet—which is correct? Will riprap significantly extend above the base flow/normal waterline or not—diagrams in Attachment P suggest it will, but the text in Attachment P claims it will not. In general, the amount of riprap suggested for the riverbank along the upstream portion of the project is a concern, particularly in light of the excessive armoring of the riverbank that accompanied the Edventure Pavilion project immediately upstream of the project area.

Otherwise, we were particularly pleased to see the emphasis placed on riverbank restoration for the project area and look forward to staying informed and involved in the project as it moves forward.

Sincerely,



John M. Grego, President





May 6, 2021

Mr. John Grego, President  
Friends of Congaree Swamp  
PO Box 7746  
Columbia SC 29202-7746

Re: Comments Submitted on Behalf of Friends of Congaree Swamp  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Grego,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your January 16, 2021, comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material. DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts and assure that the cleanup is conducted safely and effectively.

**Comment Concern: Movement of remaining TLM post-removal**

**DHEC Response:** Area 2 was added specifically to target TLM near the shore line. The area to the west of Area 2 is largely defined by several feet of sediment on top of very little TLM. There will be long term monitoring post removal to evaluate any changes in site conditions.

Comment Concern: Cofferdam Design and Impact on western shoreline

DHEC Response: There has been much study that has gone into balancing removing the largest amount of TLM removal while achieving the requirements of a no-rise certification for a USACE permit. The easiest source of information would be the No Rise Certification document on the website from October 2019 that is available on our website.

Comment Concern: Mussels

DHEC Response: DHEC supports the Mussel Relocation Plan in Attachment H of the submittal and allowing natural mussel repopulation following project completion. Following remediation a period of monitoring will be required to evaluate the return to natural conditions, natural repopulation will be evaluated during this period to determine if additional action is needed.

Comment Concern: February 2020 Flood

DHEC Response: DHEC acknowledges that water levels were significantly above flood stage during February 2020. There has been numerous studies of sediment deposition in the river over the course of this project. If it is determined that significant changes in sediment deposition has occurred due to recent flooding events, additional study will be made to determine if project parameters have changed.

Comment Concern: Riverbank restoration

DHEC Response: The Final Design for the Modified Removal Action will define the riverbank restoration efforts in more detail. DESC will work to return the property as desired by the riverfront property owner, and required by the resource agencies. DESC's goals are to minimize riverbank disturbance where possible, to restore disturbed areas to natural pre-MRA conditions, and to utilize bioengineering techniques and structures to the extent practical when repairing impacted shoreline. It is expected that there will be armoring that will extend above base flow particularly on the northern end of the project area.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: **File 52561**  
**Ken Taylor, Director, BLWM**  
**Veronica Barringer, Midlands EA Region**  
**Chris Corley, Midlands EA Region**  
**Lucas Berresford, BLWM**

February 22, 2021

315 Senate Street  
Columbia, South Carolina 29201

Mr. Greg Cassidy  
State Voluntary Cleanup Program  
S.C. Dept/ of Health and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Dear Mr. Cassidy:

Thank you for accepting our letter proposal to DHEC and thus, the US Army Corp of Engineers (USACE) , regarding the most recent and second proposed Congaree Tar Removal Project. Our specific concerns are the following: The undisclosed number of trucks that will traverse Senate Street; the potential damage to our properties; the effect of the value of these homes; and the quality of life, including psychological and mental anguish for these Senate Street homeowners and City Club overall and most importantly, the reason/s for the change in plans away from the capping option permit granted by the USACE. To date, DHEC has not acted upon this permit but instead took a different direction.

At some point in this arduous process a lawsuit was threatened on behalf of the River Keeper and a public meeting was hosted by DHEC at ED Venture. We were in attendance and our perception was the evening's meeting seemed staged so as to elicit a preconceived outcome in favor of the River Keeper's position for tar removal. It was surreal. We attended that meeting and did not come away thinking the focus of that tar had changed. For a project of this size the decision to support tar removal has far too few citizens given the opportunity for voicing public opinion.

Subsequent to that public meeting, a Stake Holders Group was formed and received reports periodically regarding the on-going work. City Club, nor its representatives, were invited to receive these reports. It was only after Mr.

Effinger informed City Club of the June 8 Southern Route termination letter was City Club included. Remember: City Club, the stakeholder most impacted by this tar removal.

#### CITY CLUB PHYSICAL LOCATION:

City Club is a gated residential community bordered on four sides by Gervais Street, Williams Street, Senate Street and Gist Street. There are eight (8) flats within the Middleton Building on Gervais. Additionally, there are twenty-seven (27) four story townhomes cumulatively on Williams, Senate and Gist with four (4) townhomes internal to the complex on City Club Drive. Currently, approximately 67 individuals live in these homes with the average age of most being over the age of 60 and many of those retired and some would say, elderly. Our lowest guesstimate annual collective payment in City property taxes is on the up-side of \$150,000.

#### CITY CLUB HISTORY WITH DOMINION, (SCE&G/SCANA) AND DHEC:

Prior to the 2015 One-Hundred-Year Flood, Dominion, then SCE&G/SCANA met fairly often with City Club residents. Mr. Bob Apple, Mr. Tom Effinger, and an entourage from that organization hosted small suppers to explain all this work to us. We were led to believe they were giving us this much attention because, let's face it, City Club is THE residential community most affected by this tar removal experience. The principals of these organizations had detail maps, photos, and diagrams to help make the points of this project and ALWAYS told us these projections were subject to the approval of DHEC and the Army Corps of Engineers.

#### PROPOSED TRUCK TRAFFIC PRIOR TO THE 2015 ONE-HUNDRED FLOOD:

During those meetings we were told the trucks would come onto the site from across the Gervais Street bridge, make a right turn onto Gist Street and then again, a right turn onto the dirt extension of Senate down to the Congaree River. Once the trucks were loaded with the extracted tar, they would travel up the hill on Senate, make a right turn onto Huger and out via Blossom to West Columbia/Cayce.

#### ALTERNATE APPROVED TRUCK ROUTE

During these meetings the City Club homeowners were encouraged to write DHEC and the U. S. Army Corps of Engineers (USACE) regarding any thoughts we had regarding this issue. It was from one of those letters that the Southern Route was proposed and accepted by all parties as a means for ingress and egress to/from the tar removal operation. That route took the truck traffic down Blossom Street and onto the adjoining property and across a proposed bridge to be constructed by Dominion. We as homeowners breathed a deserved sigh of relief.

#### CURRENT PROPOSED TRUCK TRAFFIC ROUTE ON SENATE STREET:

We realize the issues are not static but fluid in that one decision impacts other decisions on the same issue. As it ensued, the Southern Route failed. As it now stands, truck traffic will come via Huger Street onto the site after making a right turn after coming through the traffic light at Huger and Gervais. How very unfair for the four City Club homes on this one little street which holds additionally one business and the Cathy Novinger Girl Scouts Center, Midlands to the Mountains Building!

It was stated in the February 8, 2021 public virtual meeting, approximately four (4) trucks per hour are projected to transverse Senate Street. It is unconscionable this Senate Street option will stand. We understand a report has made it clear the Senate roadbed is best suited for this truck traffic. What about the quality of life for those homeowners unfortunate to have purchased their home along that street? For an operation that will be so very noisy during the 9:00 a.m. to 4:00 p.m. time period each day, it does seem as if the Senate Street homeowners are asked to shoulder the entire burden for City Club AND all other "stakeholder" groups.

In addition to the four homes on Senate Street, we must include two others that stand to share this burden. They are the end "unit" or home at 1123 Williams Street nearest the Cathy Novinger Girl Scout Center and the end "unit" or home at the corner of Gist and Senate Streets, 1100 Gist Street. In these two homes and four on Senate, two or three homes have homeowners who work outside the home each day. The other homes are occupied by retired or those "working from a home office".

It is good to know Dominion will monitor truck traffic and will inspect the foundations and external walls of our homes both prior to this work and after. However, no one has told us that damage to our homes will be corrected should damage have occurred at the end of the tar removal. At that point, we possibly could find ourselves in an ugly and public legal dispute through no fault of our own. It may, in fact, become our children's cause as they are heirs to a market value inheritance. We do not wish that to be their burden nor our legacy.

It is only fair to note, during the two most notable earthquakes, one damaging the Washington Monument and the more recent one on the Virginia /North Carolina border, the McMillan's felt those quakes, the higher the floor, the greater the impact. Only time will demonstrate more permanent damage; those trucks surely will not help this situation.

As it stands today, there is traffic beyond the early morning and late afternoon "quittin' time" traffic using Gist and Senate streets as a detour around the traffic light at Huger and Gervais. This happens all day with people using this route for the exact same purpose. And, on those rare occasions when a large truck, those with more than two axels, starts to pull that Senate Street hill away from the river, it is heard and felt all over the house which is 30 feet from 315 and 313 Senate Street. Imagine that for on average four times per hour during the days of operation!

Senate Street was narrowed during the renovation of the Cathy Novinger Girl Scout Center in order to provide more street parking. We cannot help but question the impact these trucks traveling up and down this street, so close to the Cathy Novinger Girl Scout Center, Midlands to the Mountains will have on the private fundraising required to keep the Center operational.

And, imagine a little girl forgetting an important item to her the evening before at a Brownie Meeting. Imagine a mom or dad driving out of the Scouts' parking lot or backing out of the angled Senate Street parking space the next day to retrieve the item left behind. Visibility is not great and four or five giggling little Brownies or older Girl Scouts, can be a driving parents' distraction. Flagman or not, sometimes the best laid plans end in tragedies, which is why they are called accidents.

**DIMINISHED HOME VALUES; LESS PROPERTY TAX REVENUE FOR THE CITY:**

In a townhome community the home's comparable values are more closely associated than a street with a mixture of different style homes, i.e.: Colonial Williamsburg, Frank Lloyd Wright Mid-century Modern, English Tutor, etc. In a townhome community such as City Club all homes look alike and the sale price of one home more heavily depends upon the previous sale price of a home. Comparable values bear that out. In our case the value is judged by our uniqueness, our alikeness rather than our differences.

Reduced home values do mean reduced equity for the homeowner at the time of sale; in addition, it will be a near impossibility to sell our homes for the appropriate value during this tar removal process, four (4) to eight (8) years! Even the time of year for a move, should it occur, will be determined by this tar removal process because there is not room on the street for a parked large moving van and those commercial grade trucks. This tar removal process will dominate our lives for years to come.

And, reduced home values mean LESS PROPERTY TAX revenue for the City. As a guestimate and based upon the amount we pay and multiplied by the number of homes here, currently, that tax revenue amount would be equaled to over one-half the City Manager's salary or nearly all the Chief of Police salary. Please do not mis-understand, we are residents of this City and think those two officers within City Government deserve every cent of their salaries. Columbia is fortunate to have each in their respective positions. Perhaps our tax funds are not meaningful to the City but it is for the owners of City Club, and as it now stands serves as "a bird in hand" for the City coffers? Reducing the home values via this constant traffic for several years (four 4 to 8 eight?) certainly seems to serve as a detriment to those City coffers.

#### FINAL THOUGHTS:

Finally, it is understandable the adjoining land owner prefers to keep his land from being "tied-up" for eight (8) years and in so doing, deny the Southern route, but what about these homeowners who will be STUCK with this decision for those eight (8) years and beyond and suffer the constant noise, danger, potential costly damage to hearth and home and personal well-being? How does one justify that scenario? Our home and personal well-being hangs in the balance.



Even so, we are people who are concerned about our environment. We want to leave a better world for our grandchildren. We so wish the plastic straws were out of our oceans. We think in the end when we face God in the great beyond, we will be admonished for any of our actions to damage HIS great earth. Our environment is important. However, has anyone really suffered for the tar in that river; has DHEC followed those who reported it; do any of them have a life-threatening disease directly tied to the tar exposure; have there been any fish kills as a result of that tar; is all this damage to our homes, to City Club, not to mention quality of life, worth this massive undertaking? And the cost? It is obscene so that DHEC will not need to defend a lawsuit?

We still see folks enjoying the river each weekend. No one seems concerned about this feat nor their feet! Once Spring rolls around again, come over and see the kayak trailers parked along Senate and Gist Street on weekends. People are out in the river!!!

As we have reviewed this letter, it occurs to us that some could determine some of our observations and projections seem to be unusual, unimaginable, outrageous, or even, "far-fetched". In the last 60 years, we did not predict the Vietnam War and its casualties taken from our generation; the 60's Civil Rights era; the twin towers falling; the Ben Laden era with the Iraq and Afghanistan Wars; our country nearly sliding off the economic cliff in 2007/2008/2009; the division this county is now going through; or civil unrest with cities burning; a home-grown mob invading our U. S. Capitol, with all that in our lives, did we ever think we would experience a world-wide pandemic? In a word, "NO".

Covid 19 is a "far-fetched" happening which is restricting, obstructing, and hindering our lives and the U.S. economy to the extent we all are experiencing. As we draft this letter 500,000 lives lost in our country alone. So, yes, maybe our concern about our lives and our homes is "far-fetched", but we have lived to see "far-fetched" become a reality. "Far-fetched" can and does happen.

**BOTTOM LINE:** What do the McMillan's and Mrs. Nuttall want?

We still are not totally understanding why the current process of removing rather than covering/capping the tar has been made, when at one time our understanding is that CAPING was submitted to the Army Corps as the preferred and viable plan. The Corps granted the work permit. How many more "whack-a-

mole" options will DHEC require before this long, exhausting planning process will continue to be tolerated?

Per this latest plan submitted to the USACE, we understand there likely is no other way to transport the tar except to use commercial grade trucks. We understand the land owner has the right to refuse the use of his land as a preferred route to transporting the tar away from the Congaree. However, the City Club development and certainly these six City Club homeowner needs, as those most affected by this tragedy of events, should be considered beyond what has been offered. We need some thought given to mitigate the unfair "over-use" of Senate Street as the sole traffic option which leads to Option # 1. See below.

#1: We would like to have the previous capping option's permit granted by the Army Corps become the official end to this saga. In addition, we request the following: Numbers 2 through 6;

#2: We would like to have an open session with the South Carolina Department of Transportation so that real resident concerns of our community can be shared with the DOT;

#3: We request to be informed as to the official projected number of trucks on Senate per day, per six-month annual working period. Please take into consideration the number of projected days per six-month period Dominion will actually be able to work in the river;

#4: Minimally, we ask that Dominion use the Gist Street ingress route. It has a short, defined lane for turning right off of Gervais Street between the bridge and Gist Street. There is enough room for the project's shorter hauling trucks to make that right turn. If not, the trucks are driving too fast across the bridge. There is a traffic light at the beginning of the bridge entrance from West Columbia to direct the flow of bridge traffic during hours of this tar operation. And, we understand the idea that Senate has a better road bed to handle these trucks. Convenient reason/excuse, on a project of this magnitude, why not appeal to the Department of Transportation/City if this is deemed such a good idea for the State and City, to do their part and make Gist road-bed operational for this specified traffic. AFTER ALL, IT WAS USED AS A STAGING AREA FOR HEAVY EQUIPMENT DURING THE AFTERMATH OF THE 2015 FLOOD. It withstood that unfortunate effort.

#5: We request more thought be applied to the perceived reduced value of these homes as noted above. We understand there are all kinds of reasons why home values become reduced but in a townhome community such as ours, our concern is a valid one. When Rebecca McMillan was president of the first self-governed City Club HOA, she studied this phenomenon in order to know more about how to prevent the erosion of this community's property values, thus, preventing City Club from becoming just another run-down condominium-apartment complex.

#6: Finally, there are all kinds of pollution in this world and sometimes, noise pollution should be considered just as damaging as other kinds. Excessive noise pollution, especially among the older population, can and does cause reduced hearing. See CDC web page on hearing loss.

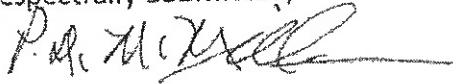
It is medically known, that diminished hearing can adversely impact the human brain leading to dementia. When the hearing section of the brain grows inactive, it results in tissue loss and changes in brain structure, creating the first link between hearing loss and Alzheimer's disease. See Newcastle University, Griffiths, T.D. 2020 "How Can Hearing Loss Cause Dementia?" We try to live healthful lives, avoiding any activity leading to excessive noise. How painful, stressful and intolerable to know this noise will invade our home for between four (4) and eight (8) years!

(7) At the time of the decision to abandon the capping option, SCE&G/SCANA was the entity to hate. Their troubles with the VC-Sumner nuclear plant was public knowledge broadcast "above the fold" on an almost daily basis. Major decisions like this one should not have been made while that organization was also undergoing non-related massive public exposure, vilifications and out-right hatred.

We bare no ill will to the principals who are making these decisions. We just humbly ask your final decision to be that which does not make Senate Street the absolute lowest point on this tar removal totem pole. Please review the already USACE approved permit for capping this tar. Was the decision to deny the plan based on that which supports the public good, including our homes and personal well-being? Or for a specific group?

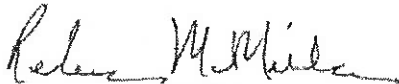
Therefore, and for all the above reasons, we as homeowners at 315 Senate Street and 313 Senate Street ask for reconsideration of the already approved USACE (1<sup>st</sup>) capping work permit and consequently the "over-use" of truck traffic on Senate Street.

Respectfully submitted,



P. D. McMillan

315 Senate Street



Rebecca S. McMillan

315 Senate Street

Annetta Nuttall

313 Senate Street



cc: Amy Cappellino, USACE

Tom Effinger, Dominion Energy

Rev Edward H. McDowell, Jr., Columbia City Council, District II

The Honorable Richard Harpootlian, SC State Senator, District 20

Teresa Wilson, Columbia City Manager

Gordon Langston M.D.; President City Club Homeowner Association

Jay McKay, Attorney Owner/Resident 1123 Williams Street, Vice President City Club HOA

Carolyn Leedecker, Secretary City Club Homeowners Association

Paul and Melissa Harrill, Owner/Resident 317 Senate Street

Ted and Debbie Fetner, Owner/Resident 311 Senate Street

Don and Jan Lowman, Owner/Resident 1100 Gist Street

City Club Homeowners

The Cathy Novinger Girl Scout Midlands to the Mountains Girl Scout Council

See that Council membership below:

The Kathy Novinger Girl Scout Midlands to the Mountains Council Members:

CEO, Lara Tucker

CFO, Ed Devore

CBO, Lynn Arve

COO, Crystal Gaines

CDO, Kara Winburn



May 6, 2021

Mr. and Mrs. McMillan  
315 Senate Street  
Columbia, SC 29201

Ms. Annetta Nuttall  
313 Senate Street  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. and Mrs. McMillan and Ms. Nuttall,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 22, 2021, comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative,

[S.C. Department of Health and Environmental Control](http://www.scdhec.gov)

2600 Bull Street, Columbia, SC 29201 (803) 898-3432 [www.scdhec.gov](http://www.scdhec.gov)

DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

WILLIAM R. JOHNSON  
1126 GIST STREET  
COLUMBIA, SC 29201

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February 22, 2021

Mr. Greg Cassidy  
State Voluntary Cleanup Program  
Bureau of Land and Waste Management  
SC Department of Health & Environmental Control  
2600 Bull Street  
Columbia, SC 29201

RECEIVED

FEB 25 2021

SITE ASSESSMENT,  
REMEDICATION, &  
REVITALIZATION

Dear Mr. Cassidy:

I understand that you are overseeing the coal tar deposit issue in the Congaree River between Gervais and Blossom Streets in Columbia, South Carolina. I am one of the original owners from the City Club, a residential development adjacent to the area in question. Proximity to the river was a key drive in motivating me to buy a home at the City Club. I originally resided in the historic building in the center of the City Club Development. In October, I acquired a townhouse in the same development on the Gist Street side, motivated largely by my desire to be even closer to the river.

I am not an environmental expert by any means, but I fail to comprehend how tar that has been embedded in the river for 70 years is going to cause any problems unless people come in and disturb it. This whole situation strikes me as a solution in search of a problem. Nobody is looking to drink water from the Congaree River, and even if you remove every single particle of tar, that will not change. What people are looking to do is enjoy recreation along and on the river. That quality of life aspect was critical in attracting me and many other City Club residents to invest significant amounts to buy homes here. I hate to think that the enjoyment of new home overlooking the beautiful river will be marred by years of remediation efforts aimed at . . . what?

I would respectfully request that the Corps of Engineers and DHEC focus their resources on more pressing issues where environmental contamination is causing present, material harm or is anticipated to cause future, material harm. I cannot see how this situation warrants the time, energy, and money that would go into the remediation effort. I further cannot see how the benefits of this undertaking would outweigh the disturbance to the lives of many homeowners who invested in the City Club because of their desire to enjoy river access.

Thank you for your time and attention to my concerns.

Best regards,



William R. Johnson





May 6, 2021

Mr. William Johnson  
1126 Gist Street  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Johnson,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 22, 2021 comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

# **CONGAREE RIVER TAR LIKE MATERIAL (TLM) CLEANUP MEETING**

## **COMMENTS**

**Neal Klimek**

**Superintendent of Treatment Facilities**

**City of Cayce SC**

**[nklimek@caycesc.gov](mailto:nklimek@caycesc.gov)**

**(803) 521-6913**

I attended the November 17, 2020 virtual meeting and would like to submit additional comments.

### **OVERALL CONCERN**

Possible escaping floatable and colloidal petroleum by-products; that may float downstream from the coffer dams and enter the intake of the City of Cayce SC raw water intake/reservoir.

### **COMMENTS**

1. I understand that the TLM removal will be on dry ground, behind the coffer dams. In the event of any petroleum by-products migrating from the bottom of the dam under the coffer dam; could floating petroleum-absorbing booms be installed as a precaution ?
2. In the event of any petroleum by-products flooding over the coffer dam in the event of flooding waters; would it be feasible to install floating petroleum-absorbing booms as a precaution?
3. At the intake of the raw water intake, as a precaution, floating petroleum-absorbing booms may need to be installed at the river intake structure; to ensure the isolation of any possible discharge of floating petroleum by-products flowing into the intake structure.



May 6, 2021

Mr. Neil Klimek  
1800 12<sup>th</sup> Street  
Cayce, SC 29033

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Klimek,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your December 15, 2020 comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material. DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts and assure that the cleanup is conducted safely and effectively.

Comment Areas: Possible Escaping Colloidal Petroleum By-Products

DHEC Response: It is important to DHEC that our stakeholders along the river feel comfortable with the proposed project. I do not foresee that any petroleum by-product would escape the cofferdam area. The tar-like material that we have seen during sampling activities is very similar to asphalt and most is very worn or degraded. Dominion Energy will have silt curtains up and

monitor river turbidity especially during cofferdam construction and removal. DHEC and Dominion Energy will need to evaluate if petroleum absorbing booms would be another needed measure of insuring all material is maintained in the site area.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Cassidy".

Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

February 12, 2021  
(via email)

1110 Gist Street  
Columbia SC 29201

Mr. Greg Cassidy  
State Voluntary Cleanup Program  
Department of Health & Environmental Control  
2600 Bull Street  
Columbia SC 29201

Re: Congaree River Coal Tar/Sediment Cleanup

Dear Mr. Cassidy:

Following the virtual meeting earlier this week, I am providing comments regarding the proposed Congaree River Coal Tar Cleanup Project. I have been a resident of the City Club neighborhood since June 2018 and I took a great interest in the project soon after I learned about it from my neighbors. I'm a kayaker and my wife and I discovered this neighborhood when we were looking for a place to put my boat in the river. We both enjoy the views of the river and the Bridge, so we have a keen interest in how this project will be implemented. I'm also a retired professional archaeologist with decades of experience in planning and managing archaeological studies, many on sites with contaminated soils and unexploded ordnance, some with both. My work has also involved environmental impact analysis of major infrastructure projects such as the DC METRO rail system and high profile projects such as the siting of the new Museum of African American History and Culture on the National Mall.

The first SCE&G (now Dominion) presentation I attended was March 2019 at 301 Senate Street for City Club residents. Before the meeting I had familiarized myself with some of the studies and I had an opportunity to speak with some of the SCE&G staff. Obviously, much work had preceded my arrival but I was uncertain about the process SCE&G had used to select full removal (Alternate 4) over capping (Alternative 3). To me it seemed that Alternative 4 offered very little marginal benefit over Alternative 3, but with far greater risk, expense, and harm to the environment. I still believe that to be the case. One notable item at that meeting was a presentation board that showing a temporary access road (now referred to as the southern route) to the site from Blossom Street. During the meeting, the SCE&G presenter, Tom Effinger, recounted the story of how one of my previous neighbors had done a bit of exploration and worked with SCE&G to make this a viable element of the project. It was especially important to the City Club neighborhood as it would eliminate the need for construction traffic on Gist or Senate Streets.

Before the formal public meeting held at the state museum in April 2019, I had a chance to review the background studies in greater detail. I paid particular attention to the archaeological study and the work plan for TLM removal. During the meeting I voiced my concerns with the choice of Alternative 4 over Alternative 3 but I was informed that the decision to pursue Alternative 4 had already been made, a decision based on public sentiment expressed during a previous meeting. One thing I noticed during my review of the archaeological study was that it did not cover the area of the southern route. After the formal meeting, I spoke privately with Mr. Effinger and mentioned that SCE&G should do a supplemental archaeological study to examine the southern route. I was surprised when Tom's response was that such a study wouldn't be necessary because the access agreement SCE&G had with the landowner had expired at the end of 2017.

Later that year, Lucas Beresford of DHEC made a presentation to the City Club residents in our community room. In this presentation he stated that the southern route would be used for construction traffic, at which point I interrupted and told him that according to my information from Tom Effinger, the southern route had been a dead issue for over a year. The use of our frontage streets (Senate, Gist, Williams and Gervais) for heavy construction traffic is by far the most important issue for the City Club neighborhood, a severe negative impact that we believed would be mitigated by use of the southern route. Why were the project proponents (DHEC and SCE&G/Dominion) continuing to present this plan to the public when it was not viable?

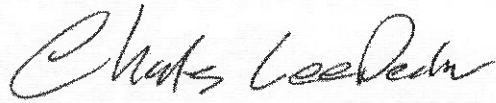
What struck me most clearly was the lack of rigor in the process that led to selection of Alternative 4A. I have learned through participation in many Environmental Assessments and Environmental Impact Statements that agency officials must carefully assess the benefits and drawbacks of clearly defined alternatives, while taking public comment into account. The EE/CA study was the closest study I could find to a formal alternatives analysis, but there are significant impact topics that have not been examined, most notably the noise and traffic issues associated with the construction program. These are the issues that are most important to myself and my City Club neighbors. I respect the right of the Riverkeeper and other like-minded individuals to advocate for their preferred course of action, and I generally support their organizational mission. But I am not aware that they have any formal decision authority or statutory remit with regard to land use decisions and permitting. So I was surprised that the Riverkeeper was introduced as a key stakeholder and given a seat at the (virtual) head table at the November 2020 public meeting. City Club has benefitted from a number of private briefings on the project so I might have expected that we would also be treated as a key stakeholder with input into the decision-making process.

Removal of the coal tar and the archaeological deposits at the same time would be difficult enough in dry conditions, but it's much more challenging on a submerged site. I have personally developed and implemented many archaeological recovery plans, and as I read the work plan, I

realized that the Congaree Coal Tar cleanup could turn into an epic boondoggle. Given the results of the pilot study, the local river hydrology, and my assessment of the work plan, I am very skeptical of Dominion's estimated time frame for completion of the work. I doubt that anyone could develop a more accurate schedule, the point being that the duration of the construction nuisance in our neighborhood is certain to be at least four years and possibly much longer. I wonder if Dominion is prepared to accept significant cost overruns and scheduling delays. No one wants to see a re-enactment of the nuclear power plant at Fairfield.

Perhaps what is most ironic is that DHEC is now advocating a plan (4A-a hybrid of No Action and Removal) than is less effective at meeting the project goals (and more destructive to the environment) than a plan (Capping) for which a permit has already been granted.

Sincerely,

A handwritten signature in black ink that reads "Charles Leedecker". The signature is written in a cursive, flowing style.

Charles Leedecker

Cc: A Cappellino, USACE



February 19, 2021  
(via email)

1131 Williams Street  
Columbia SC 29201

Mr. Greg Cassidy  
State Voluntary Cleanup Program  
Department of Health & Environmental Control  
2600 Bull Street  
Columbia SC 29201

Re: Congaree River Coal Tar/Sediment Cleanup

Dear Mr. Cassidy:

The question of how exactly the coal tar came to its current location in the Congaree River is one that has been puzzling me for some time. SCE&G (now Dominion) has acknowledged that the material originated at a coal gasification plant that operated near the intersection of Huger and Hampton Streets. How the material arrived would be a moot point, as Dominion has agreed to fund the cost of cleanup, and the question would be even less consequential if Dominion had chosen to proceed with either capping (Alternative 3) or full removal (Alternative 4) of the material. But the current proposal (Alternative 4A) to allow a significant portion of the material to remain in the river makes it important to understand how the material behaves within its current setting.

At an earlier public presentation, Dominion described how they had conducted testing along the ravine that led from the generation site to its present location. This stream channel seemed like a plausible pathway for the material to have moved by natural means to the shoreline at the foot of Senate Street. I accepted this assumption, and when Dominion stated that all of their samples along this channel were negative, I thought to myself “they didn’t do enough sampling.” As I study this issue more closely, I have less confidence that we truly understand the origin of the material. We clearly understand how the Confederate ordnance got to the site; the historical record indicates that General Sherman’s troops raided the armory, loaded everything on wagons and dumped it in the river.

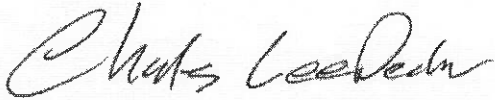
An alternative hypothesis, that the coal tar was dumped in the river in a clandestine “cleanup” operation, is perhaps more plausible, given the apparent absence of any TLM in the unnamed tributary channel. Another relevant observation is that the heaviest concentration of material coincides with a convenient dumping location, i.e., the foot of Senate Street. The deposits are now spread along a 2000-foot length of the river, with lower concentrations downstream. The overall distributional pattern of the TLM suggests that the material IS mobile and particularly susceptible to movement during flood events, which are quite common. Construction of the

cofferdams will constrict the river channel, causing higher velocity flows that will further disperse the TLM.

All of this raises the question of whether the project proponents have given adequate consideration to the long-term impacts of proceeding with a partial cleanup plan.

I appreciate your attention to my concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Leedecker". The signature is written in a cursive style with a large initial "C".

Charles Leedecker

Cc: A Cappellino, USACE  
City Club HOA officers



May 6, 2021

Mr. Charles Leedecker  
1131 Williams Street  
Columbia, SC 29201

Re: Congaree River Public Comment Period Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Leedecker,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 2021 letters.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

February 19, 2021

State Volunteer Clean-up Program  
Greg Cassidy  
2600 Bull Street  
Columbia, SC 29201

Dear Mr. Cassidy,

My name is Ranel Mencarelli. I am a homeowner of a condominium in the Middleton Building of City Club. I am also on the Home Owner's Association for City Club Condominiums.

I have been told that you are the person that I should inform regarding my concerns of the plan of using Senate Street as a route to do the tar removal project.

I am very much opposed to the idea of trucks using Senate Street. I am retired but do some part time counseling. I spend a lot of time at home. At times, I see clients in my home.

The idea of all the noise and dust on a daily basis from these trucks is horrifying to me. Not only because when I am here alone, I want to rest. I have several health issues including a heart problem. I must keep stress levels down because it will exacerbate the problems. The constant noise of the trucks will drive me mad. Not to mention the nuisance of the noise while I'm trying to listen and talk with a counseling client.

The Middleton Building is on the Historical Land Sights of Columbia. It is an old building with the original single pane windows. Obviously, these windows do not do much sound protection.

I will have lived here only 4 years come July. I love it here and the community. I do not want to think of moving.

Please, if you have any influence at all, stop this plan of using Senate Street in this tar removal project.

I appreciate your time.

With respect,  
Ranel Mencarelli



May 6, 2021

Ms. Ranel Mencarelli  
300 Gervais Street #203  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Ms. Mencarelli,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your February 19, 2021, comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

The concerns expressed against the capping alternative were voiced in the 2017 public meeting over recreational user safety, long term impacts to wildlife and aquatic habitat, and the belief that there must be a way to remove much of, if not all, this material from the river. The Engineering Evaluation / Cost Analysis (EE/CA) identified removal as the preferred alternative, DHEC agreed that it was worth additional discussions with DESC and the Army Corps to see if, with some alterations, a removal plan could be successfully implemented.

DHEC has upheld its commitment of transparency to the local community through conversations, meetings, written correspondence, and webpage updates to include notification of DESC's inability to secure an access agreement for construction trucks to use the southern route. Although regrettable, the lack of an access agreement cannot deter us from finalizing a viable, long-term solution that addresses the threats posed by the contamination.

The US Army Corps of Engineers (USACE) permit for the cleanup project relates specifically to aspects of the river and shoreline. It does not address the quality of life concerns emphasized in your letter such as property values and noise impacts, nor does it address concerns with truck traffic/routes or potential structural damage to homes. As with earlier aspects of the project, DHEC believes that using a collaborative approach in discussions about these issues will result in finding long-term, effective solutions for the environment and community as a whole. Ongoing dialogue with all affected stakeholders will ensure that concerns are heard and addressed throughout the life of the project.

Truck traffic will be highest in the first few months and last few months of the project in order to construct and then remove the cofferdam. However, during the majority of the project the number of trucks will be limited to how quickly the material can be removed and processed.

DHEC is committed to working with DESC to ensure that all reasonable measures are taken to minimize impacts to your community and assure that the cleanup is conducted safely and effectively. We hope to also have continued involvement from City Club residents as more detailed design plans are submitted and reviewed by DHEC.

Please do not hesitate to contact me at (803) 898-0910, or by email at [cassidga@dhec.sc.gov](mailto:cassidga@dhec.sc.gov), to discuss the project and your concerns.

Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
Chris Corley, Midlands EA Region  
Lucas Berresford, BLWM

November 25, 2020

Dear Mr. Cassidy,

Thanks very much for being willing to consider my concerns regarding the removal of tar from the river near the City Club.

Two to three years ago, I attended several meetings along with officials representing the Department of Health and Environmental Control ( DHEC). I found those meetings regarding the removal of the tar to be very informative and the DHEC officials to be understanding and caring individuals regarding our concerns.

The homeowners here at City Club were very concerned about the tar removal project at that time, and we are still very concerned. During the meetings in 2017-2018, we were informed that the trucks moving the toxic tar would exit at the south end of the river (Blossom Street). Now, we understand that the trucks will exit at Senate and Gist Streets. This will place those trucks too close to our homes. I am not only concerned about the traffic but about our health and safety as well. In addition, we are very concerned about those who live here with pre-existing health conditions. A medical doctor who lived at City Club during our initial meetings clearly stated that removing the tar from the river this close to our homes would be a serious health hazard. That doctor did some research regarding tar removal and subsequently moved elsewhere because she was too afraid to live here.

It is also our understanding that officials regarding this tar-removing project have stated that an inspection of street-side homes at City Club will be done before the project starts and upon completion of the project. While this is appreciated, my main questions are: What will be done to protect our health? What will be done regarding noise and pollution brought to our community? What will be done to alleviate the noise and stress when leaving and returning to our homes during the removal of the tar? What will be done if homeowners become ill?

Mr. Cassidy, most of us are retired and afraid to have this project carried out this close to our homes. Also, many of us have spent our life's savings to live here and cannot afford to move.

Could a cap be placed on the tar in the river?

Whatever can be done to protect our community will be highly appreciated.

Sincerely,

Jake Sello  
1124 Gist Street  
Columbia, SC 29201





May 6, 2021

Mr. Jake Sello  
1124 Gist Street  
Columbia, SC 29201

Re: Congaree River Public Comment Letter  
Congaree River Sediment Cleanup (SCE&G Fleet Maintenance Site)  
Columbia, South Carolina

Dear Mr. Sello,

Thank you for your continued interest in the Congaree River Sediment Cleanup and your November 25, 2020, comment letter.

As you know, DHEC has been studying conditions in the Congaree River and evaluating cleanup options since 2010 when the tar-like material (TLM) was discovered. DHEC has engaged with, and carefully considered, the input of all stakeholders throughout this process - including local residents, the riverfront property owner, the Congaree Riverkeeper, Dominion Energy SC (DESC), and local, state, and federal officials. Using this collaborative approach, DHEC has gained insight into the common interests of all parties involved and has made a determination that the best cleanup alternative for this site is the Modified Removal Action (MRA). The MRA offers long-term effectiveness and addresses the primary risks posed to human health and the environment by permanently removing the majority of the TLM, including areas where it is most susceptible to human exposure and where it is the thickest. The MRA will address an area larger than the footprint of the sediment capping alternative and will be a permanent fix requiring little if any future monitoring or maintenance. The capping alternative would leave 100% of the TLM in the riverbed and would have to be monitored, and possibly adjusted, in perpetuity. Both the MRA and capping alternatives would require heavy machinery and truck traffic using Senate Street. Also, the no action alternative is not acceptable to DHEC given the potential for future human exposure to the material.

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Sincerely,



Greg Cassidy, Project Manager  
State Voluntary Cleanup Program  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: File 52561  
Ken Taylor, BLWM  
Veronica Barringer, Midlands EA Region  
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Lucas Berresford, BLWM