

# SOUTH CAROLINA ELECTRIC & GAS



## WETLANDS CERTIFICATION

FOR THE  
**WILLIAMS STATION  
FGD POND**  
BERKELEY COUNTY, SOUTH CAROLINA

**OCTOBER 2018**



## 1 OVERVIEW

The EPA Administrator, Gina McCarthy, signed the Disposal of Coal Combustion Residuals from Electric Utilities final rule on December 19, 2014, and it was published in the Federal Register (FR) on April 17, 2015. The regulations provide a comprehensive set of requirements for the safe disposal of coal combustion residuals (CCRs), commonly known as coal ash, from coal-fired power plants. The rule is administered as part of the Resource Conservation and Recovery Act [RCRA, 42 United States Code (U.S.C.) §6901 et seq.], using the Subtitle D approach.

South Carolina Electric & Gas (SCE&G) is subject to the CCR Rule. Based on SCE&G's review of the rule, the **FGD Pond at SCE&G Williams Station** have been determined to be existing CCR surface impoundment subject to the CCR rule requirements.

## 2 PURPOSE

The purpose of this report is to document that the Williams Station FGD Pond meets the requirements of CCR rule §257.61 – *Wetlands*.

## 3 APPLICABLE REGULATIONS

CCR rule §257.61 – *Wetlands* states the following:

### § 257.61 WETLANDS

*(a) New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in § 232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs (a)(1) through (5) of this section.*

*(1) Where applicable under section 404 of the Clean Water Act or applicable state wetlands laws, a clear and objective rebuttal of the presumption that an alternative to the CCR unit is reasonably available that does not involve wetlands.*

*(2) The construction and operation of the CCR unit will not cause or contribute to any of the following:*

*(i) A violation of any applicable state or federal water quality standard;*

*(ii) A violation of any applicable toxic effluent standard or prohibition under section 307 of the Clean Water Act;*

*(iii) Jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of a critical habitat, protected under the Endangered Species Act of 1973; and (iv) A violation of any requirement under the Marine Protection, Research, and Sanctuaries Act of 1972 for the protection of a marine sanctuary.*

*(3) The CCR unit will not cause or contribute to significant degradation of wetlands by addressing all of the following factors:*

*(i) Erosion, stability, and migration potential of native wetland soils, muds and deposits used to support the CCR unit;*

*(ii) Erosion, stability, and migration potential of dredged and fill materials used to support the CCR unit;*

*(iii) The volume and chemical nature of the CCR; (iv) Impacts on fish, wildlife, and other aquatic resources and their habitat from release of CCR; (v) The potential effects of catastrophic release of CCR to the wetland and the resulting impacts on the environment; and (vi) Any additional factors, as necessary, to demonstrate that ecological resources in the wetland are sufficiently protected.*

*(4) To the extent required under section 404 of the Clean Water Act or applicable state wetlands laws, steps have been taken to attempt to achieve no net loss of wetlands (as defined by acreage and function) by first avoiding impacts to wetlands to the maximum extent reasonable as required by paragraphs (a)(1) through (3) of this section, then minimizing unavoidable impacts to the maximum extent reasonable, and finally offsetting remaining unavoidable wetland impacts through all appropriate and reasonable compensatory mitigation actions (e.g., restoration of existing degraded wetlands or creation of man-made wetlands); and*

*(5) Sufficient information is available to make a reasoned determination with respect to the demonstrations in paragraphs (a)(1) through (4) of this section.*

With regards to § 257.61(a) above, 40 CFR § 232.2 defines wetlands as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.”

#### **4 CCR UNIT DESCRIPTION**

Williams Station is coal-fired electric generation plant located in Goose Creek, Berkeley County, South Carolina. The FGD Pond is used to manage wastewater generated from the flue gas desulfurization scrubber system. The FGD Pond was constructed in accordance with construction permit (permit 19263-IW) issued from DHEC on March 9, 2009, and placed into operation in accordance with an operation approval issued by DHEC on October 6, 2009.

#### **5 WETLAND DISCUSSION**

Prior to the development of the FGD pond (in 2009), the area where the FGD Pond is located was a man-made wastewater treatment basin (referred to as ‘Pond C’) that had operated since the early 1970’s for the sole purpose of industrial wastewater treatment in support of Williams Station power generating operations in accordance with William Station’s NPDES permit (current permit #SC0003883) which included periodic maintenance for basin dewatering and excavation and removal of accumulated settled waste solids. Development of the FGD Pond was achieved entirely within the limits of the former Pond C

basin. Prior to the development of the FGD pond, the area where the FGD Pond is located was not jurisdictional wetlands.

## **6 CONCLUSION**

The CCR unit is not located in wetlands and therefore CCR rule §257.61 is satisfied.