

Appendix A
Santee Cooper Biological Service's
Pesticide Discharge Management Plan

Pesticide Discharge Management Plan

for:

Santee Cooper: Biological Services

Aquatic Plant and Algae Control

Santee Cooper Project Boundary
Office: 1 Riverwood Drive, Moncks Corner, S.C. 29461

Decision-maker(s):

Santee Cooper: Biological Services
Chad Holbrook – Manager Biological Services
1 Riverwood Drive
Moncks Corner S.C. 29461
843-761-8000 Ext:4728
chad.holbrook@santeecooper.com

PDMP Contact(s):



Santee Cooper: Biological Services

The Santee Cooper Environmental Resources Biological Service' staff performs all aquatic plant and algae control operations on the Santee Cooper lakes and other Santee Cooper properties as requested. Additional support staff will be provided by contract ground and aerial applicators which will be determined on an as needed basis. Biological Services personnel that are responsible for these duties are listed below in Table 1.

Pesticide Discharge Management Plan (PDMP)
[Santee Cooper: Biological Services Pesticide Discharge Management Plan Aquatic Plant and Algae Control](#)
 03/01/2023

Name	Job Title	Work Location	Office	Mobile	Radio Call #
Brian Lynch	Director Environmental Services	Moncks Corner Annex	843.761.8000 x4620	843.312.9214	172
Casey Moorer	Senior Manager, Environmental Resources	Moncks Corner Environmental Resources Lab	843.761.8000 x4776	843.709.0477	171
Allan Stack	Environmental Specialist III	Moncks Corner Environmental Resources Lab	843.761.8000 x4407	843.412.2745	804
Ernie Guerry	Environmental Specialist III	Moncks Corner Environmental Resources Lab	843.761.8000 x5467	843.609.7185	154
Chad Holbrook	Manager Biological Services	Moncks Corner Environmental Resources Lab	843.761.8000 x4728	843-870-5807	744
Carl Bussells	Senior Environmental Specialist	Moncks Corner Environmental Resources Lab	843.761.8000 x5590	803.622.4159	157
Judson Riser	Environmental Specialist III	Moncks Corner Environmental Resources Lab	843.761.8000 x4680	803.682.0657	775
Jeanette Gilmetti	Environmental Technician-Coordinator	Moncks Corner Environmental Resources Lab	843.761.8000 x4564	N/A	ABS
<u>Contract Services</u>					
Aerial Services Summit Helicopters	Contract Applicator	P.O. Box 39 Cloverdale, VA 24077	540.521.6837	540.798.9034	N/A
<u>Estate Mgt. Services</u>	Contract Applicator	305 Indigo Dr. Brunswick, GA 31525	912.466.9800	912.313.4224	N/A

Table 1: Aquatic Plant Management Program Personnel

1 Riverwood Drive
Moncks Corner, S.C. 29461

PMPD Preparation Date:

[3/1/2023](#)

[Updated Organizational Structure 10/3/2023](#)

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SECTION 1: Operator Information

Instructions (see PGP Part 1.0):

- Describe the Pest Management Area(s) and identify the type(s) of Pesticide Use Patterns, Operator type, and if there will be a discharge to a Tier 3 water.

Note: An “Operator” is defined in Appendix A of the PGP to mean any entity associated with the application of pesticides that results in a discharge to Waters of the United States that meets either of the following two criteria: (1) any entity who performs the application of a pesticide or who has day-to-day control of the application (i.e., they are authorized to direct workers to carry out those activities); or (2) any entity with control over the decision to perform pesticide applications including the ability to modify those decisions. Operators identified in (1) above are referred to in the permit as Applicators while Operators identified in (2) are referred to in the permit as Decision-makers. As defined, more than one Operator may be responsible for complying with this permit for any single discharge from the application of pesticides.

A “Pest Management Area” is defined in Appendix A of the PGP to mean the area of land, including any water, for which an Operator has responsibility for and is authorized to conduct pest management activities as covered by the PGP permit (e.g., for an Operator who is a mosquito control district, the pest management area is the total area of the district). The Pest Management Area could include contiguous and non-contiguous sites.

1. Provide a brief description of the Pest Management Area(s).

Pest Management Area Description

Pest Problem Description / Problem Plant Species

Aquatic plant management operations have been ongoing since the lakes were impounded in the early 1940s, with several invasive aquatic plants presenting serious challenges over the years. Licensing to operate the hydro project under the Federal Regulatory Energy Commission (FERC) mandates Santee Cooper protect the intended uses of the lake by effective aquatic plant management practices.

Santee Cooper’s aquatic plant control strategies are documented through historical data and annually in the South Carolina Aquatic Plant Management Plan (*Refer to Figure 1 below*). Through continuing education, on the job/university research and professional training/literature, the Biological Services staff is well versed on the latest methodology and product availability to achieve the best results with minimal negative impact to the environment.

Aquatic vegetation and algae are the primary pest problems affecting the intended uses of the Santee Cooper lake system and other Santee Cooper owned water properties. These pests can be primarily distinguished in two categories: Native and Invasive (Non-Natives).

Native species are plant communities that belong or are native to an area. Natives do not usually negatively impact the intended use of the water body and mostly are only managed with herbicides when they do so.

Invasive species are plants that have been introduced to a water body and if left unmanaged can outcompete native vegetation and severely impact the intended use of the waterbody.

Native Species: fanwort (*Cabomba caroliniana*), water willow (*Justicia americana*), slender naiad (*Najas sp.*), giant cutgrass (*Zizaniopsis miliacea*), coontail (*Ceratophyllum demersum*), Filamentous algae – Lyngbya (*Lyngbya wollei*), Pithophora (*Pithophora spp.*) slender pondweed (*Potamogeton pussilus*), fragrant waterlily (*Nymphaea odorata*), and eel grass (*Vallisneria americana*)

Invasive Species: hydrilla (*Hydrilla verticillata*), crested floating heart (*Nymphoides cristata*), water hyacinth (*Eichhorhria crassipes*), alligatorweed (*Alternanthera philoxeroides*), giant salvinia (*Salvinia molesta*), common salvinia (*Salvinia minima*), water primrose (*Ludwigia spp.*), and Eurasian Watermilfoil (*Myriophyllum spicatum*).

2. Identify the Pesticide Use Patterns for this Pest Management Area that trigger the requirement to develop a Pesticide Discharge Management Plan. (check all that apply). Note: Decision-makers, that are a large entity, are required to develop a PDMP if they are required to submit an NOI. See Part 5.0 of the PGP for exceptions.

- | | |
|--|---|
| a. <input type="checkbox"/> Mosquitoes and Other Flying Insect Pests | c. <input type="checkbox"/> Animal Pests |
| b. <input checked="" type="checkbox"/> Weeds and Algae | d. <input type="checkbox"/> Forest Canopy Pests |

3. Operator Type (check one):

- a. Federal Government
- b. State Government
- c. Local Government
- d. Mosquito control district (or similar)
- e. Irrigation control district (or similar)
- f. Weed control district (or similar)
- g. Other: If other, provide brief description of type of Operator:

SECTION 2: PDMP Team

Instructions (see PGP Part 5.1.1):

- List the Decision-maker, person or organization that prepared the PDMP and/or responsible for revising the PDMP, and the person or organization that will prepare and address corrective actions, adverse incident, and spills. Indicate respective responsibilities, where appropriate.

1. Decision-maker: *Any entity with control over the decision to perform pesticide applications including the ability to modify those decisions.*
 Company or Organization Name: [Santee Cooper-Environmental Resources](#)
 Name: [Casey Moorer](#)
 Address: [1 Riverwood Drive](#)
 City, State, Zip Code: [Moncks Corner, S.C. 29461](#)
 Telephone Number: [843-761-8000 Ext:4776](#)
 Email address: casey.moorer@santeecooper.com
 Fax number: [N/A](#)
 Area of Control (if more than one Operator at site): [Biological Services](#)
2. PDMP Contact: *Person(s) who should be contacted regarding PDMP questions.*
 Company or Organization Name: [Santee Cooper- Biological Services](#)
 Name: [Chad Holbrook](#)
 Address: [1 Riverwood Drive](#)
 City, State, Zip Code: [Moncks Corner, S.C. 29461](#)
 Telephone Number: [843-761-8000 Ext:4728](#)
 Email address: chad.holbrook@santeecooper.com
 Fax number: [N/A](#)
 Area of Control (if more than one Operator at site): [Biological Services](#)
3. This PDMP was Prepared by: *Person(s) responsible for developing and revising the PDMP.*
 Company or Organization Name: [Santee Cooper- Biological Services](#)
 Name: [Judson Riser](#)
 Address: [1 Riverwood Drive](#)
 City, State, Zip Code: [Moncks Corner, S.C. 29461](#)
 Telephone Number: [843-761-8000 Ext.4680](#)
 Email address: jjriser@santeecooper.com
 Fax number: [N/A](#)
 Area of Control (if more than one Operator at site): [Biological Services](#)

4. Please include any additional team members and their responsibilities.

The Santee Cooper Environmental Resources Biological Service' staff performs all aquatic plant and algae control operations on the Santee Cooper lakes and other Santee Cooper properties as requested. Additional support staff will be provided by contract ground and aerial applicators which will be determined on an as needed basis. Biological Services personnel that are responsible for these duties are listed below in Table 1.

Name	Job Title	Work Location	Office	Mobile	Radio Call #
Brian Lynch	Director Environmental and Water Systems	Moncks Corner Environmental Resources Lab & RWS	843.761.8000 x4620	843.312.9214	172
Casey Moorer	Manager, Biological Services	Moncks Corner Environmental Resources Lab	843.761.8000 x4776	843.709.0477	171
Allan Stack	Environmental Technician A	Moncks Corner Environmental Resources Lab	843.761.8000 x4407	843.412.2745	804
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Table 1: Aquatic Plant Management Program Personnel

Duties:

Senior Manager Environmental Resources- responsible for the direction and management of Analytical Services, Biological Services and Vector Management Units

Manager, Biological Services - responsible for daily oversight and direction of the Biological Services' staff, including proper management of pests in pest management areas and corrective actions, evaluates application sites, receives spray requests, and maintains aquatic plant database and supporting documentation

Environmental Technician- performs daily operations, including IPM, evaluates application sites

Environmental Specialist – assists Supervisor, Biological Services as needed, performs daily operations, including IPM, evaluates application sites

Environmental Technician-Coordinator - unit contact for aquatic weed complaints, logs complaints into AWC database, places orders for herbicide inventory and miscellaneous supplies

Airboat Services – provide ground application support to unit as needed

Aerial Services – provide aerial application support to unit as needed

SECTION 3: Problem Identification

3.1 Pest Problem Description

Instructions (see PGP Part 5.1.2):

- Briefly describe the pest problem, including identification of the target pest(s), source of the pest problem, and source of data used to identify the problem in Parts 2.2.1, 2.2.2, 2.2.3, and 2.2.4 of the PGP.

Note: The response will be one or more paragraphs, depending on the nature and complexity of the project. The source of the pest problem may be unknown. EPA does not expect the Decision-maker(s) to conduct long term studies to determine the source of the pest problem.

Pest Management Area Description

Pest Problem Description / Problem Plant Species

Aquatic plant management operations have been ongoing since the lakes were impounded in the early 1940s, with several invasive aquatic plants presenting serious challenges over the years. Licensing to operate the hydro project under the Federal Regulatory Energy Commission (FERC) mandates Santee Cooper protect the intended uses of the lake by effective aquatic plant management practices.

Santee Cooper's aquatic plant control strategies are documented through historical data and annually in the South Carolina Aquatic Plant Management Plan (*Refer to Figure 1 below*). Through continuing education, on the job/university research and professional training/literature, the Biological Services staff is well versed on the latest methodology and product availability to achieve the best results with minimal negative impact to the environment.

Aquatic vegetation and algae are the primary pest problems affecting the intended uses of the Santee Cooper lake system and other Santee Cooper owned water properties. These pests can be primarily distinguished in two categories: Native and Invasive (Non-Natives).

Native species are plant communities that belong or are native to an area. Natives do not usually negatively impact the intended use of the water body and mostly are only managed with herbicides when they do so.

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Native Species: fanwort (*Cabomba caroliniana*), water willow (*Justicia americana*), slender naiad (*Najas sp.*), giant cutgrass (*Zizaniopsis miliacea*), coontail (*Ceratophyllum demersum*), Filamentous algae – Lyngbya (*Lyngbya wollei*), Pithophora (*Pithophora spp.*) slender pondweed (*Potamogeton pussilus*), fragrant waterlily (*Nymphaea odorata*), and eel grass (*Vallisneria americana*)

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3.2 Action Threshold(s)

Instructions (see PGP Part 5.1.2):

- Describe the action threshold(s) for pest(s) in the pest management area, including data used in developing the action threshold(s) and method(s) to determine when the action threshold(s) has been met.

Note: An action threshold is the point at which pest populations or environmental conditions necessitate that pest control action be taken based on economic, human health, aesthetic, or other effects. An action threshold may be based on current and/or past environmental factors that are or have been demonstrated to be conducive to pest emergence and/or growth, as well as past and/or current pest presence. Action thresholds are those conditions that indicate both the need for control actions and the proper timing of such actions.

Action Threshold

Aquatic plant control activities are initiated as early as possible when plants are actively growing to minimize impact by vegetation on intended uses of the water bodies. These primary uses include: hydro-electric generation, navigation, drinking water and recreation. Through surveillance and notification by lake residents and users, preventive applications have been successful in keeping most plants in check. Undeveloped shoreline areas are not treated for native plant growth, unless impacting intended uses. However, invasive plants, such as those listed above, require a zero-tolerance approach as they can rapidly spread and suppress or replace desirable native vegetation. With this in mind, Santee Cooper has an aggressive management plan in place to control these plants. Through integrated control methods (chemical and biological control), *Hydrilla* is being controlled, while allowing native plant populations to recover.

3.3 General Location Map

Instructions (see PGP Part 5.1.2):

- Provide a general location map (e.g., U.S. Geological Survey (USGS) quadrangle map) that identifies the geographic boundaries of the area to which the plan applies and location of the waters of the U.S.
- To improve readability of the map, some detailed information may be kept as an attachment to the site map and pictures may be included as deemed appropriate.

General Location Map

Treatment activities will be performed primarily on shoreline and open water areas on the Santee Cooper lakes, encompassed by Berkeley, Orangeburg, Calhoun, Clarendon and Sumter counties. Additionally, treatment activities may be performed on any other property owned by Santee Cooper. A general map of the primary treatment area is below (Figure 1).



Figure 1: Map of Santee Cooper Lakes

3.4 Water Quality Standards

Instructions (see PGP Part 5.1.2):

- Document waters impaired for pesticide(s) or any degradates for which there may be a discharge. Note: Operators are not eligible for coverage under the PGP for any discharges from a pesticide application to Waters of the United States if the water is identified as impaired by a substance which either is an active ingredient in that pesticide or is a degradate of such an active ingredient. See PGP Part 1.1.2.1.
- Indicate the location of all waters, including wetlands, on the general location map.
- Document any Tier 3 (Outstanding National Resource Waters) and any water(s) impaired for a specific pesticide or its degradates to which there may be a discharge.

Note: Decision-maker is not required to make a water quality standard (WQS) determination. Internet links to all state, territory and tribal water quality standards are available at:

<http://epa.gov/waterscience/standards/wqslibrary/>.

At present, there are no impaired water quality standards in the pest management areas. Water quality will be monitored in and adjacent to areas treated by the Biological Service' staff utilizing data gathered from Biological Services' ambient monitoring program. If impaired water quality is noted, herbicide applications to the area will cease or be delayed until water quality improves to an acceptable level.

SECTION 4: Pest Management Options Evaluation

Instructions (see PGP Part 5.1.3):

- Document your evaluation of the pest management options, including combination of the pest management options, to control the target pest(s) in the following sections:
 - No Action
 - Prevention
 - Mechanical/Physical Methods
 - Cultural Methods
 - Biological Control Agents
 - Pesticides
- In your evaluation, you must consider the impact to water quality, impact to non-target organisms, feasibility, and cost effectiveness.

Note: All six pest management options may not be available for a specific use category and/or treatment area. However, the PDMP must include documentation of how the six pest management options were evaluated. The PGP does not require the use of the least toxic alternative or that non-pesticide methods be tried first. Combinations of various pest management options are frequently the most effective Pest Management Measures over the long term. The goal should be to emphasize long-term control rather than a temporary fix. "Pest Management Measure" is defined to be any practice used to meet the effluent limitations that comply with manufacturer specifications, industry standards and recommended industry practices related to the application of pesticides, relevant legal requirements and other provisions that a prudent Operator would implement to reduce and/or eliminate pesticide discharges to waters of the United States.

Control Measure Description / Schedules and Procedures

Refer to Santee Cooper lakes aquatic plant management strategy in the SC aquatic plant management plan.

<http://www.dnr.sc.gov/water/envaff/aquatic/plan.html>

- LOA-005758v1.1 SCPSA (Santee Cooper)/Winyah Generating Station Wastewater Pond Treatment for Aquatic Weed and Algae Control modification Georgetown County

[I:\92330 - ABS\FIELD\AWC\LOA-005758v1.1 Santee Cooper Winyah Pond Treatment for Aquatic Weed andpdf](#)

- LOA-006197 v1.0 Santee Cooper (SCPSA) Winyah Generating Station Phoslock Wastewater Ponds Phosphorus Treatment NPDES #SC0022471 Georgetown County

[I:\92330 - ABS\FIELD\AWC\LOA-006197v1.0 Santee Cooper Winyah Phoslock addition WW Ponds.pdf](#)

SECTION 5: Response Procedures

5.1 *Spill Response Procedures*

5.1.1 Spill Containment

Instructions (See PGP Part 5.1.4):

- Document the procedure for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases to Waters of the United States.
- Employees who may cause, detect, or respond to a spill or leak must be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the PDMP team.

Spill Response Procedures

Reference to the Santee Cooper Corporate Spill Response Procedure can be located in the Corporate Policy manual under: Environmental Release and Incident Reporting – Document #02-46-06.

Spill Prevention

The potential for chemical spills is always a concern during storage, loading, unloading, transporting and applying chemicals in the field. Precautions will be taken in every phase of handling to prevent spills. A spill kit will be available at all times in the chemical storage area and each fleet transporting chemicals. The required contents of each are listed in *Table*

SPILL KIT CONTENTS

<u>Storage Area Kit Quantity</u>	<u>Vehicle Kit Quantity</u>	<u>Item</u>
1 (30 gal)	1 (5 gal)	Open-Head Drum / Pail
1	1	Pesticide Spill Policy and Procedures
4 pr.	2 pr.	Nitrile Gloves
2 pr.	1 pr.	Unvented Goggles
2	1	Respirator and Pesticide Cartridges
2 pr.	1 pr.	Rubber Boots
2 pr.	1 pr.	Tyvek Coveralls
1	1	Dustpan
12	6	Heavy Ply, Polyethylene Bags w/ties
1	1	First Aid Kit
80 lbs.	10 lbs.	Absorbent Material
1 dz.	1 dz.	Blank Labels
0	1	Portable Eyewash
1	0	Synthetic Fiber Push Broom
1	0	Square-point "D" Handle Shovel

Table 2: Required spill kit contents for storage area and vehicles

5.1.2 Spill Notification

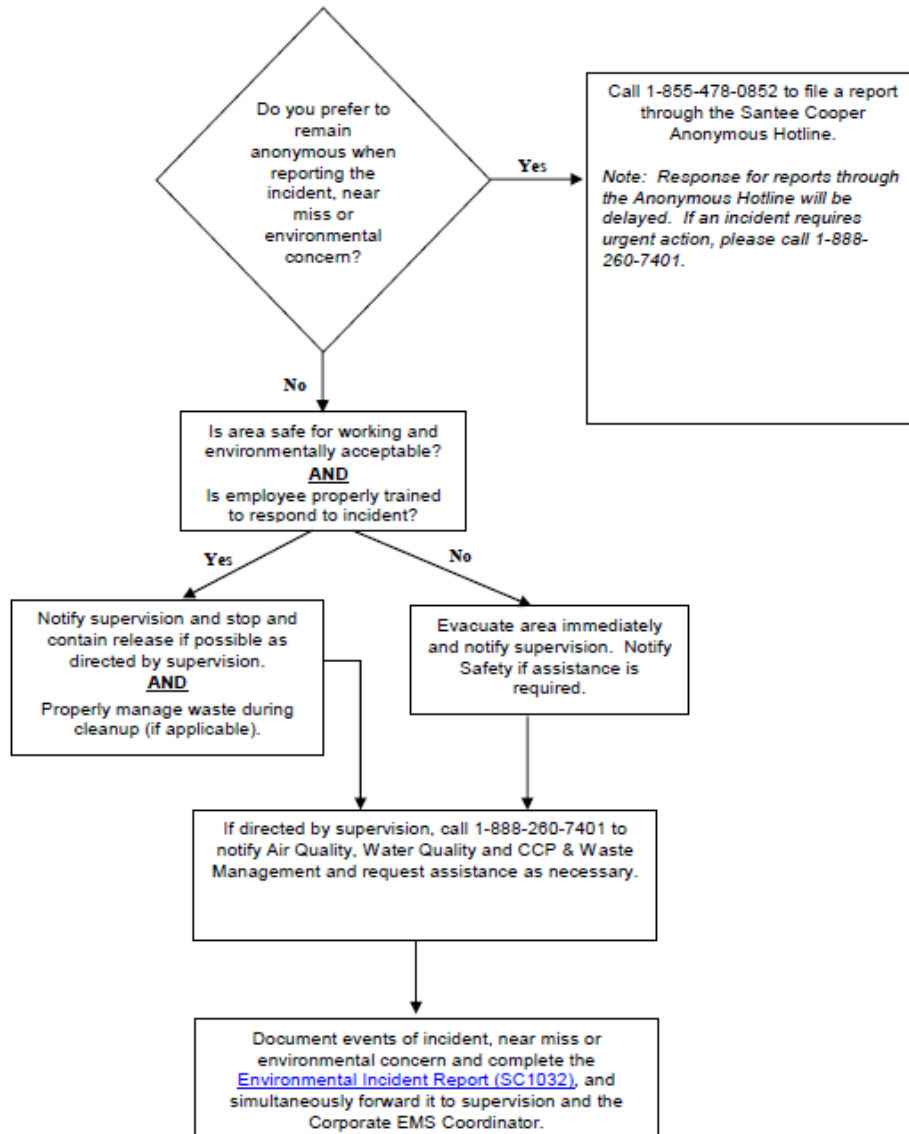
Instructions (See PGP Part 5.1.4):

- Document the procedure for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies.

Reference to the Santee Cooper Corporate Spill Response Procedure can be located in the Corporate Policy manual under: Environmental Release and Incident Reporting – Document #02-46-06.

**Policy 2-46
Exhibit A**

Environmental Incident Reporting Flow Chart – Employee Duties



Additional Emergency Response Numbers

Santee Cooper Dispatch: 843.761.8000 x4033

May be reached by pressing orange button on top of hand-held radio

SCDHEC Emergency Response: 888.481.0125 or 803.253.6488

Clemson Department of Pesticide Regulation: 864.646.2120

5.2 Adverse Incident Response Procedures

5.2.1 Responding to an Adverse Incident

Instructions (See PGP Part 5.1.4):

- Document the procedures for responding to any adverse incident resulting from pesticide applications.

Reference to the Santee Cooper Corporate Spill Response Procedure can be located in the Corporate Policy manual under: Environmental Release and Incident Reporting – Document #02-46-06.

5.2.2 Notification of an Adverse Incident

Instructions (See PGP Part 5.1.4):

- Document the procedures for notification of the adverse incident, both internal to the Decision-maker's agency/organization and external. Contact information for state/federal permitting agency, nearest emergency medical facility, and nearest hazardous chemical responder must be in locations that are readily accessible and available.

Reference to the Santee Cooper Corporate Spill Response Procedure can be located in the Corporate Policy manual under: Environmental Release and Incident Reporting – Document #02-46-06.

Adverse Incident Response Procedure - The Environmental Incident and Release Reporting procedure (document 02-46-06) outlines adverse incident response procedures employed by Santee Cooper and Biological Services. Any incident which results in adverse impacts to humans, fish, wildlife, or non-target plant species will be reported to the supervision and management as listed in Table 1. Additionally, the causes of the adverse impact will be determined through a scientific assessment to prevent or mitigate future problems.

For incidents requiring medical attention, medical emergency contact information is noted below:

Facility	Location	Phone Number
Santee Cooper Medical	Main Office Annex AG02 Moncks Corner, SC 29461	(843) 761-8000 X4090
Santee Cooper Occup. Safety Dean Ishmael	Operations Center OC05 Moncks Corner, SC 29461	(843) 761-8000 X5804 or 843.518.06279
Roper - Berkeley ER	730 Stoney Landing Road Moncks Corner, SC 29461	(843) 899-6886
Moncks Corner Medical Center (Trident)	401 North Live Oak Drive Moncks Corner, SC 29461	(843) 761-8721
Clarendon Memorial Hospital	10 East Hospital Street Manning, S.C. 29102	(803) 435-8463
Tuomey Regional Center	129 North Washington Street Sumter, SC 29150	(803) 774-9000
Regional Medical Center of Orangeburg and Calhoun Cos.	3000 St. Matthews Road Orangeburg, SC 29118	(803) 395-2200

Table 3: Emergency medical contact information for facilities located near the Santee Cooper



POLICY

Number: 2-46-06

Effective date: 2/27/2018

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Title: ENVIRONMENTAL INCIDENT POLICY

Classification: Corporate

Interpretation Contact: Director Environmental
Management System

Approved by:

DISCLAIMER

THIS IS NOT A CONTRACT OF EMPLOYMENT. EMPLOYMENT REMAINS AT-WILL AND YOU OR SANTEE COOPER MAY END THE EMPLOYMENT RELATIONSHIP WITH OR WITHOUT CAUSE, FOR ANY REASON OR FOR NO REASON, WITH OR WITHOUT NOTICE.

POLICY

I. Policy Statement

Protection of employees, the public and the environment from potentially adverse environmental incidents is a primary objective of the Santee Cooper.

This policy outlines the requirements for responding to, reporting and investigating environmental incidents including spills, releases, permit and other regulatory violations, near misses and concerns.

II. General

- A. Santee Cooper is committed to the protection of the environment. All employees are required to maintain safe working conditions which minimize the potential for environmental incidents.
- B. Incidental environmental events which are not a threat to the environment are not subject to this policy and will be addressed by supervision to minimize their occurrence.
- C. Corporate environmental and safety contact phone numbers:
 - 1. Environmental Incident Reporting Number: 888-260-7401 (24 hours/day)
 - 2. Safety phone number during regular business hours: 843-761-8000 ext. 4049
 - 3. Safety phone number after hours: 888-769-7688

Title: Environmental Incident Policy**Number:** 2-46-06**Page:** 2 of 7

- D. Additional details and requirements in support of this policy are contained in various corporate and departmental environmental plans and manuals such as the Environmental Management System (EMS) Manual, Risk Management Plan/Process Safety Management Plan (RMP/PSM), Pollution Prevention Plans with Best Management Practices (BMP), Spill Prevention Control and Countermeasures (SPCC) Plans, Continuous Emissions Monitoring System (CEMS) QA/QC Manuals and Asbestos O&M Manuals.
- E. If an employee wishes to report an incident, near miss or environmental concern and remain anonymous, then he/she may utilize the Santee Cooper Anonymous Hotline at 855-478-0852. Refer to [Policy 2-25, Santee Cooper Anonymous Hotline policy](#), for reporting instructions. If an incident requires urgent action, the employee should call 888-260-7401 to anonymously notify Air Quality, Water Quality, and CCP & Waste Management. The employee should provide as much information as possible for responders to locate and remedy the incident.

PROCEDURE**I. Definitions**

- A. Environmental Requirements – Applicable federal, state and local environmental statutes, regulations, enforceable agreements, permits and other established internal requirements.
- B. Environmental Incident Classifications:
 - i. Incidental Event – A release or other event which is not a threat to the environment or public health. Incidental events are addressed by supervision to minimize their occurrence but are not required to be documented in the [Environmental Incident Report \(SC1032\)](#).
 - ii. Level 1: Near Miss – An event which nearly results in an impact to the environment or violation of Environmental Requirements or the identification of an opportunity to improve environmental practices.
 - iii. Level 2: Minor Incident – An event which results in a minor impact to the environment or violation of Environmental Requirements.
 - iv. Level 3: Moderate Incident – An event which results in a moderate impact to the environment or violation of Environmental Requirements.
 - v. Level 4: Significant Incident – An event which results in a significant impact to the environment or violation of Environmental Requirements.

Title: Environmental Incident Policy

Number: 2-46-06

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- C. Potentially Hazardous Substance – Any substance that requires a material safety data sheet, including petroleum products, that may cause a sheen on water or any other material that may be regulated by a federal or state regulation or permit.
- D. Release – Any leaking, pumping, pouring, emitting, emptying, dumping or other emission of a potentially hazardous substance that poses a potential impact to the environment. This includes a release or spill that may be contained but has the potential to reach the environment (i.e., a release in an exterior containment area that may vaporize) or a stack emission that may exceed a regulatory standard.
- E. Supervision – Immediate supervisor and appropriate management of the Employee reporting the incident.

II. **Responsibilities**

A. Employee:

- 1. Maintains safe-working and environmentally acceptable conditions at all times. Immediately evacuates area if safe working conditions cannot be maintained.
- 2. Reports all spills, releases, near misses, and other environmental incidents and concerns to supervision immediately. Incidental events should be reported as soon as practical.
- 3. Stops and/or contains the incident or release if possible, but only if this can be done without risk of personal injury. Only personnel trained in applicable regulations and procedures should respond to incidents and releases.
- 4. Attends to and cleans incident site as directed by supervision or the Air Quality, Water Quality or CCP & Waste Management groups.
- 5. Documents events related to incidents and near misses by completing the Employees section of the [Environmental Incident Report \(SC1032\)](#), and simultaneously forwards it to supervision and the Corporate EMS Coordinator (Mail Code A203) within two business days after the incident occurs. For incidents involving more than one (1) department, the department responsible for the incident should complete and forward SC1032.

B. Supervision:

- 1. Responsible for maintaining safe working conditions within their areas.

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2. Ensures releases in their area are contained and cleaned up.
 3. Calls the Incident Reporting Number at 888-260-7401 for incidents requiring regulatory reporting or cleanup assistance.
 4. Notifies Safety at 843-761-8000 ext. 4049 (during regular business hours) or 888-769-7688 (after hours) immediately in the event the incident is currently or may potentially result in a safety hazard or an unsafe working condition.
 5. Completes the Supervisor section of [SC1032](#) and forwards it to the Corporate EMS Coordinator and the appropriate EMS Group and Department Coordinators within two business days of receiving the report.
 6. Coordinates with CCP & Waste Management for proper disposal of clean-up materials or residue.
 7. Is familiar with all applicable Corporate and Departmental environmental requirements and plans.
 8. Budgets for and ensures that appropriate response equipment is available to clean-up releases of potentially hazardous substances that may occur in their area.
 9. Coordinates with Safety and Learning and Development to provide proper training and guidance on proper Personal Protective Equipment (PPE) for employees that will handle and respond to incidents of potentially hazardous substances.
- C. Environmental Management System:
1. Reviews and ensures proper completion of SC1032 for all environmental incidents.
 2. Informs appropriate levels of management (including Executive Leadership Team) of potentially serious environmental incidents as soon as practical.
 3. Performs on-site visit for potentially serious environmental incidents.
 4. Reports environmental incidents that occur off-site or with the potential to affect third parties to Risk Management within 7 days of receiving SC1032.
 5. Assigns incident classification, determines level of investigation and leads investigation, as appropriate.

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J. Corporate Communications:

1. Coordinates the release of information to the public and the media regarding incidents.

REVISION HISTORY

Version	Date	Action
5	11/20/2014	Policy changes are to ensure consistency with the implementation of the Anonymous Hotline.
6	2/27/2018	Requires SC1032 to be submitted for all environmental incidents within two business days of the incident. Department responsibilities more clearly defined.

Operational Procedures

- a. *Storage* - Most chemical products utilized by the Santee Cooper Biological Services unit are stored in a secure, locked designated area in the Santee Cooper Environmental Resources bay area. Some 250-gallon totes, 15-30 gallon drums and granular products are stored near the central warehouse in a designated area located within the compound fence due to space restraints at the Environmental Resources building. The chemical storage area is marked with signage. Current chemical labels, Safety Data Sheets and a copy of the PDMP will be maintained at the Environmental Resources' chemical storage site and in each vehicle utilized in aquatic plant control operations. Chemical inventory will be logged weekly as spray sheets are entered in the aquatic plant control database to ensure accurate and adequate inventory is maintained. Routine inspections of inventory and quantities will be performed on a monthly basis. Older stock will be prioritized for use to prevent product degradation and to ensure older containers are removed from inventory. Product remaining at the end of each application day should be removed from respective vehicles and boats and returned to the secured area for storage.
- b. *Loading and unloading* - Prior to loading or unloading chemical containers, unit personnel will visibly check each container to ensure integrity, including container caps. If a forklift is required for the loading operation, only personnel trained and licensed in the operation of a fork lift will be permitted to operate this equipment.
- c. *Aerial applications* - Chemical loading of the operation mix truck will be performed utilizing bulk containers with cam-lock and dry-lock fittings or drum pumps. Current chemical labels and MSD sheets for product being applied will be maintained on-site for reference during the entire operation.
- d. *Transporting to and from application sites* - Adequate quantities of chemical products will be transported to the field each day to allow for the treatment of identified target species in a safe, secure manner. If quantities required for the operation or the type of chemical being transported exceed DOT thresholds, a vehicle with proper placarding and load capacity will be operated only by a driver with CDL / Hazmat credentials.
- e. *Container Disposal* - After being emptied, all chemical containers will be triple-rinsed in the field at the respective spray sites, ensuring no chemical residue remains in each container, before returning them to the storage compound. After ensuring remaining rinse water is removed from the container, containers may be recycled at the dedicated pesticide recycling bin located at the rear of the Investment Recovery compound.
- f. *Pesticide Application Equipment* - All spray systems will be checked prior to each use for proper operation, including checks for leaks and proper calibration. Calibration checks will be documented on each spray sheet. Any deficiency noted will be addressed before the start of any spray operation.
- g. *Adverse Incident Response Procedure* - The Environmental Incident and Release Reporting procedure (document 02-46-06) outlines adverse incident response procedures employed by Santee Cooper and Biological Services. Any incident which results in adverse impacts to humans, fish, wildlife, or non-target plant species will be reported to the supervision and

management as listed in Table 1. Additionally, the causes of the adverse impact will be determined through a scientific assessment to prevent or mitigate future problems.

For incidents requiring medical attention, medical emergency contact information is noted below:

Facility	Location	Phone Number
Santee Cooper Medical	Main Office Annex AG02 Moncks Corner, SC 29461	(843) 761-8000 X4090
Santee Cooper Occup. Safety Dean Ishmael	Operations Center OC05 Moncks Corner, SC 29461	(843) 761-8000 X5804 or 843.518.06279
Roper - Berkeley ER	730 Stoney Landing Road Moncks Corner, SC 29461	(843) 899-6886
Moncks Corner Medical Center (Trident)	401 North Live Oak Drive Moncks Corner, SC 29461	(843) 761-8721
Clarendon Memorial Hospital	10 East Hospital Street Manning, S.C. 29102	(803) 435-8463
Tuomey Regional Center	129 North Washington Street Sumter, SC 29150	(803) 774-9000
Regional Medical Center of Orangeburg and Calhoun Cos.	3000 St. Matthews Road Orangeburg, SC 29118	(803) 395-2200

Table 3: Emergency medical contact information for facilities located near the Santee Cooper lakes

Pesticide Monitoring Requirements

While there are no specific pesticide residue monitoring requirements, Biological Services will maintain the following information along with any required monitoring data

- Records of equipment maintenance and calibration are to be maintained by Biological Services and Transportation Svcs
- A copy of the NOI submitted to SCDHEC and any correspondence exchanged between Santee Cooper and SCDHEC specific to coverage under the permit
- The date on which you knew or reasonably should have known that you would exceed an annual treatment area threshold during any calendar year, as identified in Part 1.2.2 of the permit
 - Surveillance method(s) used, date(s) of surveillance activities, and findings of surveillance
 - Target plant(s)
 - Plant density prior to pesticide application
 - Pesticide application date(s)
 - Description of treatment area, including location and size (acres or linear feet) of treatment area and identification of any waters, either by name or by location, to which you discharged any pesticide(s)
 - Name of each pesticide product used including the EPA registration number
 - Quantity of pesticide applied (and specify if quantities are for the pesticide product as packaged or as formulated and applied)
 - Concentration (%) of active ingredient in formulation
 - For pesticide applications directly to waters, the effective concentration of active ingredient required for control
 - Any unusual or unexpected effects identified to non-target organisms
- A copy of your PDMP, including any modifications made to the PDMP during the term of this permit

Visual Monitoring

Post-treatment visual monitoring of herbicide and/or algaecide applications will be conducted at varying intervals, dependent on type of herbicide / algaecide used in the application and target species controlled and the availability of manpower. While there is usually little or no concern of adverse incidents to wildlife with partial shoreline or spot treatments, the applicator or other designated person will monitor the application site for any adverse incident. Findings will be logged on the corresponding *Aquatic Plant Control Program Form* within the database. Large scale or whole waterbody applications, however, require closer monitoring to ensure no adverse effects occur. All incidents found will be documented and reported as outlined in section 6.4 of the permit.

SECTION 6: Documentation to Support Eligibility Considerations under Other Federal Laws

Instructions (See PGP Part 5.1.5):

- If applicable, Decision-makers must keep documentation supporting their determination with regard to Part 1.1.2.4 (Endangered and Threatened Species and Critical Habitat Protection).

Please reference corporate avian guidance page.

<https://sciport.santeecooper.com/openpage.aspx?id=7560>

SECTION 7: Signature Requirements

Instructions (see PGP Part 5.1.6):

- The following certification statement must be signed and dated to certify that the PDMP is in accordance with Appendix B, Subsection B.11 of the PGP.

Note: This certification must be re-signed whenever necessary to address any of the triggering conditions for corrective action in Part 6.1 or when a change in pest control activities significantly changes the type or quantity of pollutants discharged.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the application of pesticides, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: BRIAN LYNCH Title: Director – Env. & Water Systems

Signature:  Date: 3/21/23

Repeat as needed for multiple Decision-makers at the site.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the application of pesticides, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: _____ Title: _____

Signature: _____ Date: _____

Repeat as needed for multiple Decision-makers at the site.

SECTION 8: PDMP Plan Modifications

Instructions (see PGP Part 5.2):

- You must modify your PDMP whenever necessary to address any of the triggering conditions for corrective action in Part 6.1 or when a change in pest control activities significantly changes the type or quantity of pollutants discharged. Changes to your PDMP must be made before the next pesticide application that results in a discharge, if practicable, or if not, no later than 90 days after any change in pesticide application activities. The revised PDMP must be signed and dated in accordance with the PGP, Appendix B, Subsection B.11.
- You should include significant changes in the activities or their timing on the project, changes in personnel, updates to site maps, and so on.

Revisions

5/30/2018:

Added Judson Riser, Brian Lynch, and removed Larry McCord from list of personnel involved in the program.

Removed any “ABS” and replaced with “Biological Services”

Added open bay storage near the Central Warehouse to locations of herbicide storage

Amended “Aquatic Program Daily Logs” to “Aquatic Program Form or database” since Biological Services now utilizes an Access database to record all operational activities.

Replaced Santee Cooper’s Environmental Incident Reporting Policy with newest revision

3/28/2019- Added Allan Stack to list of personnel and removed Hugo Burbage. Added Dean Ishmael to Safety Contact

1/13/2020- Added Chad Holbrook to list of personnel.

7/23/2020- Changed header date to 1/13/2020 to reflect last signature by Casey Moorer. Added Judson Riser to Section 2. PDMP Team responsible for revising the PDMP. Removed 2019 Aquatic Plant Management Strategy from document and added a link that will allow access to the current plan on SCDNR’s website.

Added information to Attachment D. Corrected spelling/grammar typos. JR

1/20/2021- Added common salvinia (*Salvinia minima*) under invasive plants treated. JR

3/9/2021- Added Summit and Estate Management subcontractor certification forms. Added new certification signature to allow Jane Hood to sign. JR

3/10/2021- Added new NOI and email regarding NOI. Added Jane Hood to list of personnel in Table 1. JR

4/13/2021- Added Jane Hood’s Signature certification under signature requirements. JR

2/1/2022- Updated Jane Hood’s name to Jane Campbell in Table 1. Added LOA-005758v1.1 SCPSA (Santee Cooper)/Winyah Generating Station Wastewater Pond Treatment for Aquatic Weed and Algae Control modification Georgetown County & LOA-006197 v1.0 Santee Cooper (SCPSA) Winyah Generating Station Phoslock Wastewater Ponds Phosphorus Treatment NPDES #SC0022471 Georgetown County to pg.15 **Control Measure Description /**

Schedules and Procedures

Updated Clemson Department of Pesticide Regulation phone number

3/1/2023- Updated Table 1. Aquatic Plant Management Program Personnel: Removed Jane Campbell and Added Brain Lynch as Director of Environmental and Water Systems. Added Eurasian watermilfoil to invasive species list. Updated position titles. -JR

SECTION 9: PDMP Availability

Instructions (see PGP Part 5.3):

- You must retain a copy of the current PDMP, along with all supporting maps and documents, at the address provided in Section III.3 of the NOI. The PDMP and all supporting documents must be readily available, upon request, and copies of any of these documents provided, upon request, to EPA; a State, Territorial, Tribal, or local agency governing discharges or pesticide applications within their respective jurisdictions; and representatives of the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS). EPA may provide copies of your PDMP or other information related to this permit that is in its possession to members of the public.
- Any Confidential Business Information (CBI), as defined in 40 CFR Part 2, may be withheld from the public provided that a claim of confidentiality is properly asserted and documented in accordance with 40 CFR Part 2; however, CBI must be submitted to EPA, if requested, and may not be withheld from those staff within EPA, FWS, and NMFS cleared for CBI review.

ATTACHMENTS

Attach the following documentation to the PDMP:

Attachment A – General Location Map

Attachment B – Pesticide General Permit

Attachment C – NOI and Acknowledgement Letter from EPA/State

Attachment D – Adverse Incident Report

Attachment E – Corrective Action Log

Attachment F – PDMP Amendment Log

Attachment G – Subcontractor Certifications/Agreements

Attachment H – Delegation of Authority

Attachment I – Annual Reports and Other Record Keeping

Attachment A – General Location Map

General Location Map

Treatment activities will be performed primarily on shoreline and open water areas on the Santee Cooper lakes, encompassed by Berkeley, Orangeburg, Calhoun, Clarendon and Sumter counties. Additionally, treatment activities may be performed on any other property owned by Santee Cooper. A general map of the primary treatment area is below (Figure 1).

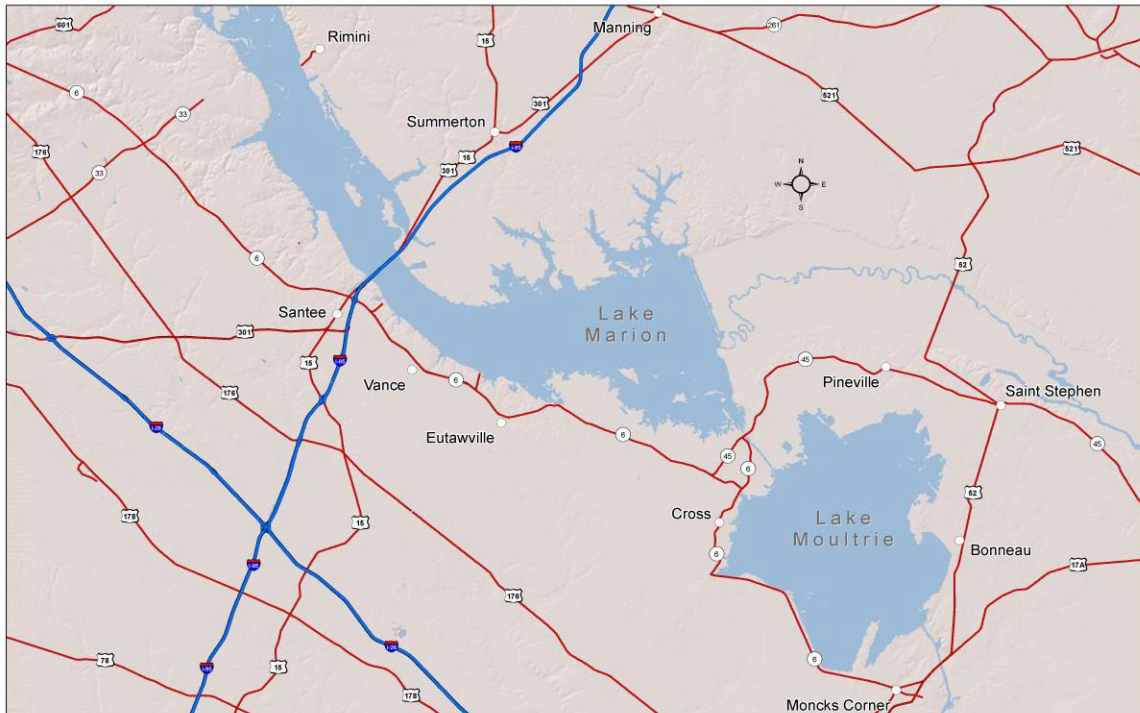


Figure 1: Map of Santee Cooper Lakes