Message

From: Dave Hargett Ex. 6 Personal Privacy (PP)
Sent: 3/29/2021 1:40:31 PM
To: Famble, Alayna [famble.alayna@epa.gov]
Subject: Supplemental Information 210329 Re: Checking in On Fwd: Lake Conestee / Reedy River PA/SI

Hi Alayna

Ex. 6 Personal Privacy (PP)

You already have more data than you need, but I've continued to grind through the old and new (SCDHEC, 2020) data to summarize it from a moderate altitude.
I think the attached summary slides of data you already have will help with your review, if you are all done, to validate your conclusions. I think the bottom line is those few of us paying attention have known about the PAH conditions and the 'smokin hot' source areas (MGPs) for over 20 years, back to when we were investigating the Colonial Pipeline spill in the late 90s. SCDHEC's 2020 data just drives underscores that reality.
I'm happy to talk about all of this any time.
I'll give you a call on Tuesday to check in on status of your review and next steps.
Very best regards,
Dave

Dave Hargett, Ph.D.

Ex. 6 Personal Privacy (PP)

PAHsinRRCorridor-Updated 210325.pptx.pdf

On Mon, Mar 15, 2021 at 9:54 AM Dave Hargett <Ex. 6 Personal Privacy (PP)> wrote:

Hi Alayna,

Ex. 6 Personal Privacy (PP)

I'll hold off on my inquiry for a couple of weeks.
Very best regards,
Dave

Dave Hargett, Ph.D.

Ex. 6 Personal Privacy (PP)

On Mon, Mar 15, 2021 at 9:31 AM Famble, Alayna <famble.alayna@epa.gov> wrote:

Hey Dr. Hargett,

Good morning, there is a delay in the review process. Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) and I will give you an update as soon as I have one. Thank you for your patience in this process.

Best wishes,

Alayna Famble

RPM | USEPA Region 4

404-562-8444 (office)

470-445-0744 (cell)

From: Dave Hargett <Ex. 6 Personal Privacy (PP)>
Sent: Friday, March 12, 2021 10:13 AM
To: Famble, Alayna <famble.alayna@epa.gov>
Cc: Dave Hargett <Ex. 6 Personal Privacy (PP)
Subject: Re: Checking in On Fwd: Lake Conestee / Reedy River PA/SI

Hi Alayna,

Happy Spring, almost.

Can we arrange a time convenient for you to catch me up on the Lake Conestee project?

I'm tied up today, but mornings Mon-Tue-Wed, next week look good for me.

Very best and Thanks,

Dave

Dave Hargett, Ph.D.

Ex. 6 Personal Privacy (PP)

On Mon, Mar 1, 2021 at 2:52 PM Dave Hargett <Ex. 6 Personal Privacy (PP)> wrote:

Hi Alayna

Hope you are well.

I think we last spoke on 08 Feb, and as I recall you expected to get done with your review of the subject SI report within a week or two.

I'm just following up on status and to see what you can share, or at what point I can FOI the documents. I have talked with the SCDHEC management team, and they are waiting on EPA to move the ball forward.

Give me a call or email anytime.

As I shared previously, I am advising a variety of stakeholders, upstream, downstream, and in the surrounding community, who are keenly interested in this process.

I am available to assist in any way to include more institutional knowledge of the LC Site and the Reedy River than anyone deserves.

Very best regards,

Dave

Dave Hargett, Ph.D.

Ex. 6 Personal Privacy (PP)

---------- Forwarded message ---------
From: **Dave Hargett** <Ex. 6 Personal Privacy (PP)>
Date: Wed, Jan 20, 2021 at 5:24 PM
Subject: Lake Conestee / Reedy River SI
To: Williams, Jason C. <williajc@dhec.sc.gov>, Cole, Robert <colerb@dhec.sc.gov>
Cc: Famble, Alayna <famble.alayna@epa.gov>, Crowley, Jeffery <crowley.jeffery@epa.gov>, Henry Porter <porterhj@dhec.sc.gov>, Angela K. Gorman <gormanak@dhec.sc.gov>, Myra Reece <reecemc@dhec.sc.gov>

Jason / Robert

I've deluged you with supplemental information, available to you via Dropbox. Please let me know if you have any questions, or difficulty getting to those items.

I've also responded on 210119 to your questions regarding usage at LCNP, and measures in place to protect patrons.

Here are a few summary points for your consideration.

1. As to your team's sampling of the Lake Conestee Site, in August, please be aware that one of the files that I made available on Dropbox, *"LC-LakeConestee-Changes-2003-2020-compiled210118.pptx.pdf"* provides some quick screen shots of aerial images of representative areas of the former lake, on which I made some quick calculations.
2. At the bottom of a 65 sq.mi. rapidly urbanizing watershed, LC is receiving on the order 12,812 c.y. (17,295 tons) of sediment per year that accrete in the lake. This is based on areas that have converted from water area to terrestrial. That converts to roughly 1.1 ft of average deposition over the 20 years since the original sampling in 2001. That is based only on change in area, not total flux of sediment down the river via bedload and suspended load.
3. Based on benchmark comparisons, these numbers are reasonable for an inner Piedmont reservoir in an urban watershed. Obviously deposition is extremely variable, and some areas are likely getting scoured.

4. Areas that are still under water at top-of-dam impounded conditions, as well as those impounded by beaver dams within the old lake area are experiencing deposition and accretion in most areas.
5. **This observation is profoundly relevant to interpretation of your results from the lake area. The media that your team sampled in Aug 2020 in many cases is not the same media that we sampled in 2001-2003, but may well be sediment that has been deposited since.**
6. Also, due to extremely intense beaver activity in the largest lobe of the lake, the West Bay, these areas are under 2 to 6 ft of water/sediment that have accumulated in three step pools behind dams that stack the water level about 2+/- ft behind each dam. In fact the 1997 aerial *(referenced above)* shows that large areas of the West Bay were forested at that time, and per the most recent imagery is now an aquatic/emergent wetland area.
7. **These observations affirm that the 'remedy' we selected as a Site management strategy for LC during the TBA and negotiation of the Restrictive Covenant (2007), were sound and have been effective.**
8. **The components of that remedy were 1) containment by maintaining the dam in good condition in perpetuity, 2) continued natural capping by incoming sediment, 3) monitored natural recovery, and 4) institutional and educational measures to protect patrons of the nature preserve.**
9. The obvious weak link is the dam. And, perpetuity is a long time.
10. **What is at risk if/when dam failure occurs is loss of not just the surficial sediment but deep strata which have dramatically higher concentrations of PAHs and other CoCs.**
11. Some of the presentations provided show imagery from 2000-2001 when the penstock orifice was completely open *(technically a dam failure already underway when CF acquired the dam in Sep 2000).*
12. I supervised the repair of this open orifice *(via a temporary penstock 'patch')* in Jun 2001 with assistance from SCDHEC (Doug Bryant) and NRCS. This temporary patch is still in place 20 years later.

13. **During the 12 months *(Jun 2000-Jun 2001)* the dam was open wide, we lost 92,000 cy of sediment *(and all of the associated entrained CoCs)* from the canyon that eroded through the reservoir sediments.** This was based on two surveys by NRCS.
14. Our downstream Reedy River sampling from the TBA confirmed the presence of highly elevated levels of CoCs, as did your August sampling.
15. **The point is all of the datasets from all of the sampling programs, including the TBA Phases 1 and 2, should be evaluated as a part of your SI analysis.**
16. Another point is that **there have been an unknown number of major releases** from Lake Conestee previously, during mill operations from 1892-1970 when sluice gates were periodically opened to flush sediment from behind the dam, and also the 2000-2001 event.
17. **So the risk of this Site is not just what is there on top, but what has and may be released from deeper, more contaminated strata, with a catastrophic dam failure at some unknown future date.**
18. As to sources of contamination, there are indeed hundreds or thousands of sites in the 65 sq.mi. watershed upstream of the dam where industrial contaminants were discharged historically, especially during the pre-regulatory decades.
19. The vast majority of those were comparatively small quantities, and were releases of less toxic CoCs.
20. The vast majority of those pollution sources are long since out of business or bankrupt.
21. There is little question where the likely sources of certain major risk-driving CoCs originated. **The two MGPs were engaged in industrial processes that produced valuable energy products (coal gas), but also produced huge masses of byproducts, includin coal tar, coal oil, and PAHs. These included the seven CPAHs, among other CoCs.** Some of the files shared present some of my personal working-analysis-in-process documents that

illustrate the comparative conditions in the headwaters, downstream of these MGPs, and in Lake Conestee.

22. High levels of PAHs throughout the urban/industriall reaches of the Reedy were initially observed in the toxicology thesis work of Everson in 1999 (provided).
23. Only after the "cleanups" of the two MGP sites were underway (2000-2003) did I put the connection together for why the PAH profile through the City was so extremely elevated.
24. Your data from your sampling program from reaches of the Reedy and tributaries upstream clearly shows these trends.
25. Interestingly, **it is not LC that is the singular reservoir for these and other CoCs, but practically everywhere one looks along the Reedy, one will find these highly elevated concentrations of CoCs**. I would expect, based on all of the data collected over the last 22 years that many undisturbed floodplain areas have similar high concentrations of these CoCs.
26. Equally important, from data I collected during 2019 at Discharge Ditch #5 at the Bramlette Site, flowing directly into the Reedy adjacent to Willard St, and immediately upstream of the City's new Unity Park, **PAHs are clearly being continuously discharged every day, still.** These results are included in the 2019 report by Aquilogic.
27. **This continuous discharge has likely been the case during the operational days of the Bramlette MGP from 1917-1952, and since that plant closed in 1952.**
28. **Such a focused source(s) of PAHs for now 104 years (1917-2021), ties directly to and helps explain the extraordinarily massive amount of PAHs that were deposited with sediment, in the LC reservoir since the LC Dam was constructed in 1892. Note that the Broad St. MGP was operational from the 1880s (?). Thus, these two plants operated and appeared to be likely sources of PAHs through the life of, and depositional record of Lake Conestee.**
29. Aerial imagery shows this **discharge from the MGP site, under Bramlette Rd, and to the discharge point to the Reedy, near Willard St has been in place since at least 1955, and likely earlier.**

30. This raises very serious questions about not only CERCLA issues, but whether this is a continuing CWA violation.

I continue to examine all of the data generated by your team's excellent work in Aug and Sep. There is much to be considered there, and I'll forward any additional insights along the way.

I'm sure no one else has been as deeply and continuously mired or immersed in these Reedy River issues for the past 25 years, so don't hesitate to send questions my way.

Last, please recognize that I am submitting all of these materials as an individual uniquely knowledgeable of the Reedy River, Lake Conestee, and the industrial history of the watershed. My interest is on behalf of several stakeholder organizations, as I no longer have an official tie to the Conestee Foundation. These matters are of concern to the entire watershed.

Many thanks for helping us wrestle these issues to hopeful resolution soon.

Very best,

Dave

LC-TPAHsinLC-PerTBAResults-2000-2006-HargettWor...

PAHs-CPAHsinRRCorridor-HargettWorkProduct-20121...

Tox-210120-ToxicologyStudies-RR&LC-Supplemental...

PubBriefings-210120-LCProcess&SCDHECHumanRiskAn...

Bramlette-210120-Related-SupplementalFiles.png

LC-210120-LakeConestee-SupplementalFiles.png

PAHs-210120-ReedyWatershed-SupplementalFiles.png

DSC06221 (1).jpg

Response to Questions - Lake Conestee / Reedy River Site Investigation

Inbox

Dave Hargett < Ex. 6 Personal Privacy (PP) >

to Jason, Robert, Henry, Alayna, Myra, Jeffery, Angela, bcc: me

Jason / Robert

Here are the answers to your questions.

How many full time & part time employees does the preserve have that works on site?

- *Conestee Foundation has 9 employees, including full- & part-time working at the Site.*
- *Also, CF has volunteers working most weeks on a wide variety of trail maintenance and construction projects.*

- *In a typical year CF/LCNP will have 2,500 to 3,000 hrs of volunteer labor on maintenance, construction, habitat enhancement, tree planting, cleanups, and a wide range of activities at the Site.*
- *Also, CF frequently has contractors working at the site on construction projects, often in wetland areas.*
- *CF's nature education programs host over 3,500 K-12, plus college students each year (of course not in pandemic times).*

Estimated number of guests to the preserve annually?

- *Based on motion detector cameras at key entrances, and direct surveillance, LCNP has over 125,000 visitors per year, possibly over 150,000.*
- *On some days over 1,500 patrons have been observed entering the Preserve.*
- *Activities include professionally led classes, tours, and field trips, self-guided educational activities, hiking, biking, dog-walking, and bird-watching and wildlife viewing.*

Documented instances of state & Federal threatened /endangered spp. within the preserve?

- *No T&E species confirmed.*
- *Anecdote: This reach of the Reedy River was the last documented observation of an active Ivory-Billed Woodpecker in SC, 1890s if I recall. We may claim they are still there.*
- *LCNP is an "Important Bird Area of Global Significance," per Audubon Society. The only IBA of GS in Upstate SC.*
- *LCNP is the wintering area for the largest population of Rusty Blackbirds east of the Mississippi R., an imperiled species due to habitat losses and climate change (but not a T or E species at this time).*
- *LCNP is recognized as the Upstate's Partner with Audubon of SC.*
- *At last count we have had 222 bird species identified at LCNP.*

Has there been any wetlands delineation at the preserve, upstream of the dam? (aside from the FWS wetland inventory)

- *There has been no formal wetland delineation of the entire Preserve, or the entire Site (historic extent of Lake Conestee).*
- *Obviously, nearly all of the historic lake parcel, 145 acres, all but about 4 acres of Sparkleberry Island (aka Taylor Island) and a tiny island no longer discernable (Henry's Island), per the 1892 plat (dam construction date) were impounded.*
- *A very rough estimate is that about 20-25 acres of the historic lake area are still impounded at the top-of-dam elevation (~797 ft msl).*
- *In addition, the area impounded behind beaver dams is roughly another 20-25 acres, mostly the West Bay.*
- *All of the historic lake area, except the islands undergo frequent flood inundation.*
- *Also, extensive areas of the historic lake area are inundated by several beaver dams, and associated step pools.*
- *The West Bay (above the 'neck of the lake') had no active beaver ponds during the 2001-2003 sampling.*
- *At this time there are three significant beaver dams, that stack water across the West Bay, each 2-3 ft.*
- *As a result all areas of the West Bay have 2 to 6+ ft of additional water column and/or accumulated sediment above the sediments that were sampled in 2001-2003 (aerial images will be forwarded later).*

Even though fishing, boating, and swimming is prohibited,

are there any reports or observations by staff of these activities occurring? I heard that someone was caught harvesting frogs for consumption. It would be helpful to have that documented for the report.

- *CF's rules and postings advise that all visitors must stay on marked trails.*
- *CF / LCNP does not have rangers or enforcement staff to monitor human activity, other than what is observed by educational and maintenance staff.*
- *Frequently, especially during favorable weather, we encounter unauthorized contact with waters and wetlands, by swimmers, waders, boaters, and anglers.*
- *On 30 Dec 2020 I encountered a Hispanic father, with three children 4-8, with fishing poles in hand, ready to enter the area.*
- *Anglers regularly trek in from nearby neighborhoods and roads to fish, to include from the dam.*
- *Last year I encountered two persons wading in wetlands to capture turtles.*
- *We have encountered persons gigging frogs.*
- *Waterfowl hunting has largely been eliminated.*
- *We do encounter some degree of deer poaching each fall.*
- *Paddling through this reach does occur, and technically the Reedy is a navigable water.*
- *CF/LCNP's clear and well posted rules include: NO FISHING, NO SWIMMING, NO WADING, NO BOATING, KEEP OUT OF WATERS AND WETLAND AREAS. (See attached sign presently used at selected points where easy access to waters appears inviting.)*
- *All continuously wet areas have boardwalks and bogwalks.*
- *LCNP has over 1-mile of wetland boardwalks, more than any state or federal park / preserve in SC.*
- *CF staff reinforce that only the trails and boardwalks are accessible to humans, and all other areas are "DO NOT DISTURB AREAS."*
- *To reinforce these rules we re-branded from LCNPark to Lake Conestee Nature Preserve.*
- *CF also received official State-sanction as a Wildlife Sanctuary under Title 50 of State Code of Laws several years ago.*
- *We do occasionally allow researchers and water quality professionals to enter restricted areas for study purposes.*
- *Wildlife seem to be thriving and reproducing.*
- *Managing humans is a constant challenge.*

Let me know if I can help further.

I will be sending several supplemental files to you this evening via DropBox.

Thanks,

Dave

Dave Hargett, Ph.D.

Ex. 6 Personal Privacy (PP)

Please Note: As of 01 January 2021 I am no longer serving as Executive Director of Conestee Foundation, Inc.