



JOHN ELNITSKY
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Ash Basin Strategy

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April 30, 2015

Ms. Elizabeth Dieck
Director, Environmental Protection
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

Subject: H.B Robinson Ash Basin Closure Decision

Reference: Robinson Ash Basin Closure Investigation: Conceptual Closure Planning Update (HDR, December 2014)

Dear Ms. Dieck:

The purpose of this letter is to document Duke Energy's decision to pursue the On-Site Landfill Ash Basin Closure Option as described in section 6.3 of the referenced Conceptual Closure Planning Update, and as discussed during our meeting at your offices on April 27, 2015.

Following the submittal of the Conceptual Closure Plan in December, 2014, Duke Energy and our contractor HDR, with assistance from the University of North Carolina at Charlotte as the groundwater modeling consultant to HDR, performed additional groundwater assessments and 2D modeling in order to determine the viability of each closure option to be protective of groundwater, public health, and environmental safety. The results of these studies determined that the degree of ash excavation required to adequately prevent impacts to groundwater under a Hybrid Cap-in-Place Closure Option was so extensive, that complete excavation of the ash basin was the most reasonable and prudent solution.

It is therefore Duke Energy's intention to construct a lined ash landfill with leachate collection system compliant with bottom liner and final cover requirements for a SCDHEC Class 3 landfill in an area on Duke Energy property northwest of the Darlington Electric Power Plant. The landfill will also be designed and constructed to concurrently meet the requirements of the Environmental Protection Agency's Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities Rule (EPA CCR Rule).

Duke Energy will submit an updated Closure Plan for the Robinson Site, consistent with this decision, as soon as practicable but no later than November 20, 2015 as previously committed. Duke Energy also anticipates submitting the permit application to begin construction of the landfill in the second quarter of 2016. Once all permits are issued, construction of the landfill is completed and the facility is permitted to operate, Duke Energy intends to begin excavation of the contents of the Robinson Ash Basin to this Class 3 landfill.

Duke Energy appreciates your feedback on our closure planning and your continued regulatory oversight of the Robinson Plant. If you have comments, questions, or desire additional information, please contact us.

Sincerely,



John Elnitsky
Senior Vice President

cc: Cari P. Boyce
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