

Swenson, Merin

From: Long, Larry <Long.Larry@epa.gov>
Sent: Monday, December 17, 2018 8:36 AM
To: Camp Hall Rail Line NEPA
Cc: Militscher, Chris
Subject: Docket No. FD36095 Camp Hall Rail Line EA
Attachments: Camp Hall Rail Line DEA 12-18.(CAM)docx.docx

Ms. Diana Wood
Surface Transportation Board
Docket No. FD 36095
C/O ICXF
9300 Lee Highway
Fairfax, VA. 22031

Re: Camp Creek Rail Line Draft Environmental Assessment, STB Docket No. 36095, Camp Hall Rail Line, Berkeley County, South Carolina.

Dear Mr. Hall:

The U.S. Environmental Protection Agency (EPA) has reviewed the Surface Transportation Board (STB) and the U.S. Army Corps of Engineers (USACE) Charleston District's public announcement, for the Draft Camp Hall Rail Line Environmental Assessment (DEA), dated November 30, 2018, consistent with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The applicant, Palmetto Railways, intends to construct and operate the proposed rail line. The proposed rail line would be located entirely within Berkeley County, South Carolina and serve to connect the Camp Hall Commerce Park to the CSX Transportation, Inc. (CSXT) main line north of the Santee Cooper Cross Generating Station.

The DEA advances two alternatives for consideration: The No Action Alternative, and the 28.01-mile, preferred alternative, which will connect the CSXT Cross Subdivision to the Camp Hall Commerce Park.

The DEA correctly references 40 C.F.R Parts 1500-1508 requirements for agency critical evaluation of the proposed alternatives. However, the DEA refers to the applicant's screening process. The DEA does state that the joint lead agencies independently reviewed the applicant's information and that they developed and applied independent screening criteria. The Final Environmental Assessment should clearly state that the evaluation of the proposed alternatives is in fact the evaluation by the cooperating agencies that follow 40 C.F.R Parts 15002-1508. The STB may want to relocate Section 2.2.2 of the DEA to the first paragraph in Section 2.0 to help demonstrate that the agency critical evaluations were those of the cooperating agencies.

The EPA recommends that the USACE collaborate with the South Carolina Department of Health and Environment Control (SCDHEC) to determine any potential impacts from the project that might result in impacts to terrestrial and/or aquatic species, including both flora and fauna.

The USACE may wish to provide the Clean Water Act Section (CWA) Section 404(b)(1) documents for this project in the appendix to the final NEPA document(s) in support of any wetland and stream mitigation decisions and to help the state regulatory agencies to evaluate stream impact requirements for the state's CWA Section 401 Water Quality permit. The Section 404(b)(1) documents can help to streamline the final environmental review and permitting processes.

Larry Long

Regional Mining Expert

Physical Scientist/Sr. Principle Reviewer
Resource Conservation & Restoration Division
EPA Region 4 NEPA Program Office
61 Forsyth Street, SW
Atlanta, GA 30303
404-562-9460
404-562-9598(FAX)
long.larry@epa.gov

Intelligence does not always define wisdom, but adaptability to change does

CONFIDENTIALITY NOTICE: This message is being sent by or on behalf of the Environmental Protection Agency. It is intended exclusively for the individual(s) or entity(s) to whom or to which it is addressed. This communication may contain information that is proprietary, privileged or confidential, or otherwise legally exempted from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message, or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.