

1. Comments submitted by the South Carolina Department of Health and Environmental Control indicate Palmetto Railways has requested approval to use fly ash for construction of the railway embankment, particularly in the vicinity of the Diversion Canal. Please provide available information on the anticipated use of fly ash in construction of the proposed rail line.

Please see the attached Beneficial Use Demonstration (BUD) Work Plan prepared for Palmetto Railways and the letter from S.C. Department of Health and Environmental Control approving the Beneficial Use Demonstration (BUD) Work Plan dated December 20, 2017.

2. Please provide a list of the types of commodities that Palmetto Railways anticipates would be carried on trains operating over the proposed rail line.

At this time, finished automobiles are the only commodity that we anticipate will be transported on the Camp Hall Rail Line.

3. What type (Tier 1, 2, 3 or 4) of locomotives does Palmetto Railways anticipate using on the proposed rail line?

At this time, Palmetto Railways intends to use two (2) GP-40-2 locomotives. These locomotives do not have a Tier classification.

The Air Quality section of the Environmental Assessment was conducted using the appropriate screening level evaluation for the proposed Camp Hall Build-in. The results of this evaluation indicated that further study including detailed air quality modeling was not warranted due to the following site and project conditions. The proposed rail corridor is in an air quality attainment area, the number of locomotive is limited, the use of the locomotives is infrequent, the proposed project corridor is in a rural area, the rail is not proximate to sensitive receptors, and cumulative impacts including construction air quality impacts were determined to be minimal. The conclusions reached by the Environmental Assessment are further supported by the inference that proposed movement of freight by rail facilitated by this proposed project significantly reduces overall emissions and associated impacts on the environment compared to the alternative use of on-road trucks.

4. Please provide the estimated locomotive diesel fuel consumption per train round-trip on the proposed rail line.

Palmetto Railways estimates the fuel consumption to be approximately 300 gallons per day, which includes approximately four hours of switching operations, a trip from Camp Hall to Cross, and a return trip to Camp Hall.

5. Please provide the locations, in addition to the Diversion Canal, where Palmetto Railways anticipates that bridges would be constructed and indicate whether pile driving would be required at each location.

The bridge over the Diversion Canal is the only bridge that is planned for the Camp Hall Rail Line at this time. Current design anticipates the utilization of drilled shaft foundations, rather than driven piles. If driven piles are utilized, Best Management Practices will be utilized as referenced in Palmetto Railways Mitigation Plan.

6. For any anticipated bridges, please indicate likely elevations.

Please see attached Plan and Profile view for Diversion Canal Bridge.

7. For any anticipated bridges, please provide any design information available, or likely design information, including photos or drawings of a bridge or bridges with similar appearance.

Please see attached Plan and Profile view for Diversion Canal Bridge. The Diversion Canal Bridge is designed to mimic the look of the SC Hwy 45 bridge that crosses the diversion canal to the North.

8. If the proposed rail line were not to be constructed and operated, where would finished vehicles produced at the Volvo Cars plant and destined for domestic sale be trucked for subsequent transfer to rail?

The current conditions require over 50,000 finished vehicles each year to travel over 80 miles via truck to CSX Transportation's Dixiana auto distribution facility outside Columbia, South Carolina. Interstate 26, a federally identified portion of the Primary Highway Freight System (PHRS), would be the only feasible route to accommodate the additional trucks hauling automobiles. Interstate 26 is already a congested highway and accidents relating to high volumes of heavy truck traffic are a common occurrence. Pavement quality and maintenance costs on the highway are already deteriorating without the addition of thousands of auto trucks to its yearly throughput.

9. Please provide the estimated duration of rail line construction.

The estimated duration of construction of the Camp Hall Rail Line is 18-20 months.

10. Please provide the estimated average and maximum number of construction workers that would be employed to construct the rail line.

Palmetto Railways used multiple methodologies for evaluating the possible number of construction employees during the duration of the Camp Hall Rail Line. Conservatively, we estimate that there would be an average of 95-105 employees, with a maximum of

105-116, used to construct the line. Additional documentation can be provided as backup upon request.

11. Is construction during nighttime hours (10 PM to 6 AM) anticipated?

Work is not anticipated during nighttime hours, as defined above, at this time.

12. Please identify likely construction staging areas, if known.

Construction staging areas are not known at this time.

13. Are any project-related fixed lighting sources anticipated outside the commerce park other than proposed early warning signs on roadways and lights/flashers at grade crossings?

Palmetto Railways intends to construct a small maintenance and office facility, tentatively located between Stations 1190 and 1240, which will have minimal exterior lighting for safety and security. No other fixed lighting is anticipated.

14. Please explain the source and rationale for the equipment utilization factors used for the construction noise assessment presented in Table 5-2 of Section 5 of Environmental Report Appendix C: Noise and Vibration Assessment.

The utilization factors (UF) are defined as “usage factor that accounts for the fraction of time that the equipment is in use over the specified time period.” Stated differently, the UF reflects the percentage of time that a piece of construction equipment is operating at full power during a set increment of time (e.g., one hour). These UF’s are part of the Road Construction Noise Model (RCNM) published by the Federal Highway Administration. In the Noise and Vibration report, we reference the following document: H. Knauer, S. Pedersem, C. N. Reherman, J. L. Rochat, E. S. Thalheimer, M. C. Lau, G. G. Fleming, M. Ferroni and C. Corbisier, "FHWA Highway Construction Noise Handbook," U.S. Department of Transportation - Federal Highway Administration, Cambridge, August 2006. The published RCNM is a national model based on the noise calculations and extensive construction noise data compiled for the Central Artery/Tunnel (CA/T) project in Boston, Massachusetts. The UF factors used in the report are published within the RCNM model.

15. Please provide additional methodology details and information on the Protected Species Assessment (i.e. Appendix D of the Environmental Report).

- a. Please provide a map, and supporting GIS data, showing where biologists had access along the proposed rail route (i.e. show land parcels where access was granted and habitat physically surveyed within and adjacent to the rail corridor).

Please see attached report and supporting exhibits prepared on behalf of Palmetto Railways by third-party contractor Sabine and Waters.

- b. Please provide a map, and supporting GIS data, showing where biologists determined presence of suitable habitat for each species assessed.

Please see attached report and supporting exhibits prepared on behalf of Palmetto Railways by third-party contractor Sabine and Waters.

- c. The Protected Species Assessment indicates that suitable foraging habitat was observed adjacent to the project area; please provide a map, and supporting GIS data, showing the location and area (size) of this habitat. Please provide any additional available details on the red-cockaded woodpecker habitat survey results.

Please see attached report and supporting exhibits prepared on behalf of Palmetto Railways by third-party contractor Sabine and Waters.

- d. Please review the three attached maps from South Carolina Department of Natural Resources and the U.S. Fish and Wildlife Service indicating two areas they have determined to have potential suitable red-cockaded woodpecker habitat. Please indicate if Palmetto Railways had access to these two areas and if habitat was physically surveyed in these two areas as part of the Protected Species Assessment. If so, please provide details on the survey methodology and the results of the surveys in these two areas (e.g., transect location and spacing, species and age of trees, nesting or foraging habitat identified, etc.). If Palmetto Railways did not have access to these two areas, please provide details on the methodology that assessed these two areas to determine whether or not red-cockaded woodpecker foraging or nesting habitat was present.

Please see attached report and supporting exhibits prepared on behalf of Palmetto Railways by Sabine and Waters.