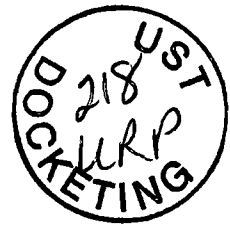




SEP 12 2017



JERRY AYCOCK
PLANTATION PIPE LINE
1000 WINDWARD CONCOURSE
SUITE 450
ALPHARETTA GA 30005

Re: Final Revisions to Corrective Action Plan Addendum Request
Plantation Pipe Line Lewis Drive Release, 112 Lewis Dr., Belton SC
Site #18693
Petroleum Pipeline Release Reported December 8, 2014
Shallow Bedrock Zone –Biosparging Pilot Study Plan received May 9, 2017
Corrective Action Plan Addendum received May 26, 2017
Response Correspondence (CH2M to DHEC) received May 26, 2017
Meeting with Plantation Pipe Line and CH2M held on July 21, 2017
Sparging Operating Limits, received July 27, 2017
Telephone Conversation with Scott Powell (CH2M) held on July 27, 2017
Interim Free Product Recovery Plan- Revision 3 received August 7, 2017
Response to Comments on June 16, 2017 Correspondence received August 14, 2017
June 2017 Monthly Status Update received August 22, 2017
Conference Call with Plantation Pipe Line and CH2M held on August 23, 2017
Anderson County

Dear Mr. Aycock:

The Underground Storage Tank (UST) Management Division of the South Carolina Department of Health and Environmental Control (DHEC) has reviewed the referenced documents. DHEC approves Plantation Pipe Line's approach to address contamination in the shallow aquifer, Brown's Creek, and Cupboard Creek. The UST Management Division will continue to evaluate the progress of the remediation by reviewing data provided in routine monitoring reports. The following was discussed and/or clarified during the August 23, 2017, conference call:

- 1) Plantation Pipe Line agreed that an annual monitoring report will be provided for review to DHEC by July 30, 2018.
- 2) Plantation Pipe Line agreed that monthly and quarterly monitoring reports will continue to be provided for review to DHEC. It was discussed that the quarterly monitoring reports will include, but not be limited to, cumulative data summaries, interpretive groundwater flow maps, iso-concentration maps, and free phase product (FPP) isopach maps.
- 3) Plantation Pipe Line clarified that the intended purpose of the Shallow Bedrock Zone –Biosparging Pilot Study is meant to remediate the shallow aquifer rather than the bedrock aquifer during a discussion regarding the location of bedrock monitoring wells in the pilot study area.

- 4) DHEC and Plantation Pipe Line agreed that gauging and recovery of FPP will continue on a weekly basis in the Brown's Creek Protection Zone (BCPZ) and the Cupboard Creek Protection Zone (CCPZ).
- 5) Plantation Pipe Line stated initiation of monitoring well installation to delineate the dissolved phase plume and the next sampling event is anticipated September 5, 2017. Plantation Pipe Line agreed that DHEC will be provided a detailed schedule prior to activities. To date a schedule has not been received.

As discussed in the July 21, 2017, meeting, changes to the Corrective Action Plan Addendum (CAPA) should include revisions to Table 2 (Revised Groundwater Monitoring Plan), Section 2, and Section 3. The changes will need to reflect the May 26, 2017, July 27, 2017, August 14, 2017, and August 7, 2017 documents. The following changes (as discussed in the July 21, 2017, meeting and the August 23, 2017, conference call) will also need to be made to the CAPA:

- 1) Quarterly groundwater monitoring of MW-33T.
- 2) The addition of MW-6B, MW-9B, MW-43, MW-43B, MW-46, MW-47, MW-48B, MW-49, and MW-50B to Table 2 for quarterly sampling.
- 3) Weekly gauging and FPP removal in the BCPZ and the CCPZ.

The changes are requested within 30 days of the date stamped on this correspondence. Please provide all edits in a different color that is easily differentiated, as discussed in a telephone conversation with Scott Powell (CH2M) on July 27, 2017.

Exceedances of Risked Based Screening Limits have been documented in groundwater collected from bedrock monitoring wells. **Please explain how dissolved phase contamination in the bedrock will be addressed within 30 days of the date stamped on this correspondence.**

DHEC requests notification a minimum of four days prior to any environmental work conducted at the site. Documents should continue to be provided in paper format and pdf via a disk with Site ID # 18693 and Plantation Pipeline Lewis Drive Release noted in a prominent location. Should you have any questions, I can be reached at (803) 898-0628 or colemabj@dhec.sc.gov. Faxes can be sent to (803) 898-0673.

Sincerely,



Bobbi Coleman, Hydrogeologist
Assessment & Unregulated Petroleum Section
Underground Storage Tank Management Division
Bureau of Land and Waste Management

CC: Chris McCluskey, Upstate Region EA Anderson
William Waldron, CH2M Hill, 3120 Highwoods Blvd., Suite 214, Raleigh, NC 27604
Gary Poliakoff, Poliakoff & Associates, PO Box 1571, Spartanburg, SC 29304
Scott Lewis, 15 Edgewood Dr., Williamston, SC 29697
Eric Lewis, 421 Reedy Fork Rd., Greenville, SC 29605
Technical File



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