

GREG DEMPSEY
PRODUCTS (SE) PIPELINE CORPORATION
1000 WINDWARD CONCOURSE
SUITE 450
ALPHARETTA GA 30005

MAR 0 9 2021

Re: Review of First Trimester 2020 Monitoring Report
Products (SE) Pipeline - Lewis Drive Release, 112 Lewis Drive, Belton, SC
Anderson County
Site #18693
First Trimester 2020 Monitoring Report received November 9, 2020

Dear Mr. Dempsey,

The South Carolina Department of Health and Environmental Control (DHEC) has reviewed the report and offers the following comments and/or recommendations are provided:

- 1) Due to the elevated water table at the site, ranging from 1.5' to 14.0' below ground surface, gauging for the presence of free phase product (FPP) will continue across the site and any FPP found will be removed.
- 2) If there is a change in site conditions such as increased product levels, product in areas that product was not previously found and/or product appears on surface waters, a new corrective action plan to address the product will need to be submitted and/or more frequent monitoring may be required to address any issue that arises.
- 3) The 5 new monitoring wells (4 residuum, 1 bedrock) to be installed in the Cupboard Creek Zone are pending access approval by the property owner.
- 4) The oxidant injections conducted in August 2019 to reduce the contaminant concentrations in the vicinities of MW-38 and MW-46. While concentrations of chemicals of concern (CoCs) in these areas decreased following the injections, first trimester sampling data indicates a rebound of CoCs in both target areas. Additional corrective action is required in these areas.
- 5) A proposal will be submitted to DHEC for expansion of the air sparge system in the Brown's Creek and Cupboard Creek areas. The proposal will be submitted once the Shallow Bedrock Air Sparging Testing on VBS-01, VBS-02 and VBS-03 is completed and the results evaluated.

In the future any proposed changes to the Corrective Action Plan Addendum (CAPA) must be provided in a stand-alone document. The reviewing of monitoring reports or any other miscellaneous documents provided by Products (SE) Pipeline or Jacobs that discuss changes to the CAPA do not constitute approval of changes to the CAPA.

DHEC should be notified a minimum of four days prior to any environmental work being conducted. Documents should continue to be provided in paper format and pdf via a disk with Site ID # 18693 and Products (SE) Pipeline Lewis Drive Release noted in a prominent location. Should you have any questions, I can be reached at (803) 898-7542 or <a href="mailto:mendenje@dhec.sc.gov">mendenje@dhec.sc.gov</a>. Faxes can be sent to (803) 898-0673.

Sincerely,

||effeng & Mandahall |Ed Mendenhall, Hydrogeologist

Assessment & Non-Permitted Petroleum Section Underground Storage Tank Management Division Bureau of Land and Waste Management

CC: Chris McCluskey, Upstate EA Region Anderson Office
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Technical File