



SEP 12 2019



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

Re: Review of 2019 Annual Monitoring Report and Response to Comments Letter
Plantation Pipe Line Lewis Drive Release, 112 Lewis Drive, Belton, SC
Anderson County
Site #18693
Petroleum Pipe Line Release Reported December 8, 2014
2019 Annual Monitoring Report received July 1, 2019
Response to Comments Letter received July 3, 2019
June 2019 Well Water Analytical Results received August 21, 2019

Dear Mr. Aycock,

The South Carolina Department of Health and Environmental Control (DHEC) has reviewed the above referenced documents. The following comments and/or recommendations are provided:

In regards to the Response to Comments Letter;

- 1) All comments addressing sampling schedules and the removal or non-removal of product recovery features have been addressed at this time. The sampling schedule for the next year was addressed in a separate stand alone document, Monitoring, Reporting, and Recovery Plan (April 1, 2019 through March 30, 2020) which was approved August 20, 2019 (Mendenhall to Aycock).
- 2) Continued free phase product (FPP) gauging and recovery are also included in the plan and the product recovery features will not be removed at this time.
- 3) The results of soil sampling done along the edges of Brown's Creek should be submitted with the next quarterly monitoring.
- 4) To address increased contaminant concentrations in the vicinities of MW-38 and MW-46, Plantation Pipe Line has conducted oxidant injections in those areas. Depending upon the results of the injections, the air sparge system will be expanded as necessary.

In regards to the 2019 Annual Monitoring report;

- 1) The future activities listed along with the new Monitoring, Reporting, and Product Recovery Plan are sufficient at this time. No changes will be made to the plan for the next year. If there is a change in site conditions such as increased product levels, product in areas that product was not previously found, product appears on surface waters, a new corrective action plan will need to be submitted and/or more frequent monitoring may be required to address any issue that arises.

- 2) Due to the elevated water table at the site, ranging from 1.5' to 14.0', gauging for the presence of FPP will continue across the site and any FPP found will be removed.
- 3) An Assessment and Corrective Action Plan should be submitted to address the elevated concentrations of petroleum chemicals of concern present in the transition zone and bedrock wells across the site.

In the future any proposed changes to the Corrective Action Plan Addendum (CAPA) must be provided in a stand-alone document. Reviewing of monitoring reports or any other miscellaneous documents provided by Plantation Pipeline or Jacobs that discusses 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 Plantation Pipe Line Lewis Drive Release noted in a prominent location. Should you have any questions, I can be reached at (803) 898-7542 or mendenje@dhec.sc.gov. Faxes can be sent to (803) 898-0673.

Sincerely,



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