



JUN 26 2018



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

Re: Reviews of Requests for Injection Well Installation, Pumping of Monitoring Wells and Monthly Status Reports
Plantation Pipe Line Lewis Drive Release, 112 Lewis Dr., Belton, SC
Anderson County
Site #18693
Petroleum Pipe Line Release Reported December 8, 2014
Request for Well Permit to Install Additional Vertical Sparging Wells received May 7, 2018
Request to Pump Select Monitoring Wells received April 30, 2018
March & April Monthly Status Reports received April 19, 2018 & May 30, 2018

Dear Mr. Aycock,

The South Carolina Department of Health and Environmental Control (Department) has reviewed the referenced documents. Comments and requests organized by document are as follows:

Request for Well Permit to Install Additional Vertical Sparging Wells

- 1) The Department suggests that additional monitoring wells be proposed west of the requested sparging wells in the area between MW-36 and MW-21 to measure the effectiveness of the supplemental sparging in the area of Cupboard.
- 2) In regard to the proposed supplemental sparging in the area of Brown's Creek, the Department requests Plantation Pipe Line specify which wells are intended to monitor the effectiveness of the supplemental sparging, as those wells will be need to be able to determine the effectiveness in the proposed sparging zone of 15 to 75 feet.

Attached please find the Underground Injection Control Permit for the installation of additional sparging wells.

Request to Pump Select Monitoring Wells

- 3) The Department requests clarification regarding the proposal to pump select monitoring wells. The title of the document leads the reader to understand pumping of wells is requested whereas the body of the document requests purging of designated monitoring wells used to monitor the effectiveness of the remediation system. Specifically, the text states that each well will be purged until a minimum of three to five well volumes have been removed or until pumped dry. As purging is a standard procedure prior to groundwater sampling, the Department has no issues regarding purging immediately prior to groundwater sampling as long as care is taken to minimize volatilization of constituents to ensure groundwater samples representative of the aquifer are collected. Purging to dryness is not recommended

unless aquifer conditions warrant. During our March 7, 2018 meeting, pumping select monitoring wells was proposed by Kinder Morgan as a possible remediation option in addition to sparging. If the request is meant to use monitoring wells as recovery wells, product recovery testing at each well should be conducted, providing data is collected at uniform and frequent intervals until an accurate recovery rate is determined at each well location. Based upon the outcome of the testing, sampling intervals following pumping can be determined.

March & April Monthly Status Reports

- 4) The future activities section of the March and April Monthly Status Reports discusses placing or moving skimmers and/or socks within groundwater monitoring wells. As stated in the May 8 Review Document (Coleman to Aycock), "The Department does not concur with removal of product from monitoring wells, as the purpose of monitoring wells is to monitor the effectiveness of the corrective action system. All skimmers or absorbent socks must be removed from monitoring wells." Additionally the March and April Monthly Status Reports activities section discusses abandonment of 1-inch piezometers. As stated in the May 8 Review Document (Coleman to Aycock), "As these piezometers have value as a resource to monitor the free phase petroleum levels in key areas and are beneficial as a measure of comparison due to their existence near the initiation of site assessment, the Department does not concur with the removal of all piezometers. The Department requires that TW-55, TW-59, TW-60, TW-64, TW-66, TW-67, TW-73, TW-96 remain intact as they are incorporated within the approved CAPA for monitoring. The Department also requests that TW-28, TW-41, TW-42, TW-45, TW-46, TW-59, and TW-94-remain intact for routine free product gauging and groundwater elevation measurement due to their location and / or importance regarding free product

The Department requests that the above noted items be addressed within 30 days.

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) 898-0628 or colembj@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

Enc: Underground Injection Control Permit #SCHE03020469M2

CC: Chris McCluskey, Upstate EA Region Anderson Office (w. / enc.)
William Waldron, CH2M Hill, 3120 Highwoods Blvd., Suite 214, Raleigh, NC 27604 (w. / enc.)
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