



MAY 12 2020



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

Re: Review of 2019 3<sup>rd</sup> Quarter Monitoring Report and Phone Conversation  
Plantation Pipe Line - Lewis Drive Release, 112 Lewis Drive, Belton, SC  
Anderson County  
Site #18693  
2019 Third Quarter Monitoring Report received January 21, 2020  
December 2019 Well Water Analytical Results received February 10, 2020  
Phone Call with Jacobs (Waldron to Mendenhall) held April 6, 2020

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 2019 3<sup>rd</sup> Quarter Monitoring report;

- 1) The soil sampling results along the Northeastern edge of Brown's Creek in the vicinity of SW-02 indicate there is contamination in the soil with Benzene and Naphthalene detections above the RBSLs for clay-rich soils. An Assessment plan to determine the extent of the contamination on the Northeast side of Brown's Creek should be submitted.
- 2) 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.
- 3) The oxidant injections conducted in August 2019 to reduce the contaminant concentrations in the vicinities of MW-38 and MW-46. The concentrations of chemicals of concern in these areas have exhibited a decrease since the oxidant injections were performed. Additional sampling data collected through the next quarter will better determine the effectiveness of the oxidant injections and if more corrective action measures will be needed to reduce the contaminant concentrations. If the results of future sampling events indicate the injections were not effective in reducing concentrations, then additional corrective action will be required.

In regards to the April 6, 2020 Phone Call, Waldron to Mendenhall;

- 1) A new Monitoring, Reporting, and Recovery Plan is due by April 30, 2020 to replace the previous plan that was in place from April 1, 2019 to March 31, 2020. The new plan will be in place from April 1, 2020 to March 31, 2021.

- 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 installation of new monitoring well MW-38B in the Brown's Creek Zone will occur during the week of April 13, 2020. The new monitoring wells to be installed in Cupboard Creek Zone were pending access approval by the property owner.
- 4) A proposal will be submitted to DHEC for recommitting portions of the air sparge system from areas where the remediation has been more effective in reducing the FPP and dissolved contaminant concentrations to areas that still have FPP or high dissolved contaminant concentrations.
- 5) A proposal will be submitted to DHEC for the removal and replacement of the Recovery Trench in the Brown's Creek area with a permanent barrier or corrective action system to address the dissolved contaminant concentrations in the groundwater.

**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 Plantation 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 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](mailto: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