

December 4, 2024

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Ms. Caitlin Reilly
South Carolina Department of Environmental Services
Assessment and Non-Permitted Petroleum Section
Underground Storage Tank Division
2600 Bull Street
Columbia, South Carolina 29201

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DEC 05 2024

UST DIVISION



Subject: Request to Maintain the Current Groundwater Monitoring and Reporting Schedule through 2025, and Update the Surface Water Monitoring Schedule Products (SE) Pipe Line Corporation Lewis Drive Remediation Site Belton, South Carolina Site ID #18693, "Kinder Morgan Belton Pipeline Release"

Dear Ms. Reilly,

On behalf of Products (SE) Pipe Line Corporation (PPL), Jacobs is submitting this letter to maintain the current number of groundwater monitoring and reporting events, maintain the current number of groundwater monitoring locations and update the surface water monitoring schedule at PPL's Lewis Drive Remediation Site (Site ID #18693), located in Belton, South Carolina (site).

As you are aware, PPL has worked diligently with the South Carolina Department of Environmental Services (DES) over the last 10 years to assess, remediate, and monitor conditions at the site. PPL has compiled a significant body of data that indicates overall decreasing trends in hydrocarbon concentrations and frequency of occurrence as shown in the First 2024 Semiannual Monitoring Report submitted to South Carolina Department of Health and Environmental Control (DHEC) on September 20, 2024.

As presented in the Corrective Action Plan Addendum #2 submitted to DHEC on May 24, 2021, and accepted by DHEC on June 29, 2021, PPL installed three new horizontal air sparge (HAS) wells (HAS-4, HAS-5, and HAS-6) to treat areas in the Browns Creek Protection Zone (BCPZ) and Cupboard Creek Protection Zone (CCPZ). HAS-4 and HAS-5 in the BCPZ began operation on June 20, 2022, and HAS-6 is ready to operate when the pending update to the current Permit to Operate is approved.

Jacobs proposes updating surface water monitoring frequency from monthly to quarterly monitoring events, with an additional surface water monitoring event in February. Since the site surface water plan was established, multiple surface water locations have become dry due to the stream flow changes resulting from the removal of site beaver dams. Of the 13 surface water locations, 10 remain usable for monitoring. Surface water locations that are no longer able to be sampled due to dry conditions post beaver dam removal include the following: SW-01 (dry since

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11/16/21), SW-12 (dry since 7/18/2023), and SW-13 (dry since 3/14/2023). Due to fluctuating stream flows, SW-03, SW-05, and SW-14 are only able to be sampled intermittently. Recent surface water monitoring results have shown detections at only 1 of the 10 surface water locations.

The proposed 2025 annual, semiannual, quarterly sampling events; semiannual product recovery; and semiannual reporting schedule are based on the current Table 1 – Groundwater and Surface Water Monitoring and Reporting Plan (January 1, 2024 to December 31, 2024) accepted by DHEC on January 4, 2024. Table 1 has been updated to reflect the changes to the surface water sampling event as agreed upon during the November 13, 2024 meeting with DES, PPL, and Jacobs. Changes agreed upon included moving surface water sampling from monthly to quarterly, with the addition of a February sampling event to capture any potential trends seen historically.

The proposed 2025 monitoring plan is presented in the attached Table 1 and sample locations are displayed on Figure 1. A calendar view of the proposed 2025 monitoring plan is displayed on Figure 2. Ideally, PPL is asking to receive concurrence to this request prior to December 30, 2024.

If you have any questions concerning this request or the project in general, please call me at (919) 859-5789 or Greg Dempsey/PPL at (770) 751-4143.

Regards,



William M. Waldron
Program Manager

Copies to: Greg Dempsey, PPL (Digital, greg_dempsey@kindermorgan.com)
Mary Clair Lyons, Esq., PPL (Digital, Mary_Lyons@kindermorgan.com)

Attachments:

Table 1 – Groundwater and Surface Water Monitoring and Reporting Plan (January 1, 2025 to December 31, 2025)
Figure 1 – Site Overview
Figure 2 – Monitoring and Reporting Plan – 2025

Table

Table 1. Groundwater and Surface Water Monitoring and Reporting Plan (January 1, 2025 to December 31, 2025)

Products (SE) Pipe Line Corporation

Lewis Drive Remediation Site, Belton, South Carolina

Site ID #18693 "Kinder Morgan Belton Pipeline Release"

Frequency ^a :	Sampling and Gauging				Biodegradation Evaluation	Product Gauging and Recovery
	February 2025	Quarterly (June 2025 and December 2025)	Semiannually ^b (September 2025)	Annually (March 2025)	Annually ^c (March 2025)	Semiannually and Annually (March and September 2025)
Analytes:	BTEX, MTBE, Naphthalene (and 1,2-DCA for Groundwater Samples Only) ^d				Nitrate ^e , Sulfate ^e , Ferrous Iron ^{g,i} , Carbon Dioxide ^e , Methane ^e , Alkalinity ^g , and DO ^{g,i}	Not Analyzed
Feature ID						
Surface Water						
SW-01 ^g	Y	Y	Y	Y		
SW-02 ^g	Y	Y	Y	Y		
SW-03 ^g	Y	Y	Y	Y		
SW-04	Y	Y	Y	Y		
SW-05 ^g	Y	Y	Y	Y		
SW-07	Y	Y	Y	Y		
SW-08 ^g	Y	Y	Y	Y		
SW-09	Y	Y	Y	Y		
SW-10 ^g	Y	Y	Y	Y		
SW-11	Y	Y	Y	Y		
SW-12	Y	Y	Y	Y		
SW-13	Y	Y	Y	Y		
SW-14	Y	Y	Y	Y		
Surface Water Subtotal:	13	13	13	13	0	0
Browns Creek Protection Zone						
MW-12			Y	Y	Y	
MW-12B			Y	Y		
MW-15			Y	Y	Y	
MW-15B		Y	Y	Y		
MW-24			Y	Y		
MW-24B			Y	Y		
MW-25			Y	Y	Y	
MW-25B			Y	Y		
MW-28			Y	Y	Y	
MW-34				Y		
MW-35			Y	Y	Y	
MW-37		Y	Y	Y		
MW-38		Y	Y	Y		
MW-38B		Y	Y	Y		
MW-39		Y	Y	Y		

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MW-40		Y	Y	Y	Y	
MW-41		Y	Y	Y		
MW-42			Y	Y	Y	
MW-43				Y		
MW-43B				Y		
MW-49				Y		
Browns Creek Subtotal:	0	7	17	21	7	0
Cupboard Creek Protection Zone						
MW-19			Y	Y	Y	
MW-20		Y	Y	Y	Y	
MW-23		Y	Y	Y		
MW-23B			Y	Y		
MW-26			Y	Y		
MW-26B			Y	Y		
MW-29			Y	Y		
MW-46			Y	Y		
MW-56		Y	Y	Y	Y	
MW-57		Y	Y	Y		
MW-58		Y	Y	Y		
MW-59		Y	Y	Y		
MW-60		Y	Y	Y		
MW-61B		Y	Y	Y		
MW-62		Y	Y	Y		
MW-63		Y	Y	Y		
Cupboard Creek Subtotal:	0	10	16	16	3	0
Hayfield Zone						
MW-02				Y	Y	
MW-02B				Y		
MW-03				Y	Y	
MW-04			Y	Y	Y	
MW-05				Y		
MW-06				Y		
MW-06B			Y	Y		

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MW-07		Y	Y	Y		
MW-08				Y	Y	
MW-09			Y	Y	Y	
MW-09B			Y	Y		
MW-10				Y	Y	
MW-13			Y	Y		
MW-13B			Y	Y		
MW-14		Y	Y	Y		
MW-14B		Y	Y	Y		
MW-16				Y		
MW-17			Y	Y		
MW-17B		Y	Y	Y		
MW-18			Y	Y	Y	
MW-21			Y	Y		
MW-30				Y		
MW-31				Y		
MW-31B				Y		
MW-32			Y	Y	Y	
MW-33				Y		
MW-33T			Y	Y		
MW-36		Y	Y	Y		
MW-36B			Y	Y		
MW-45		Y	Y	Y		
MW-45B			Y	Y		
MW-47			Y	Y		
MW-48B			Y	Y		
MW-50B			Y	Y		
MW-51			Y	Y		
MW-52			Y	Y		
MW-53			Y	Y		
MW-54			Y	Y		
MW-55			Y	Y		
Hayfield Subtotal:	0	6	27	39	8	0

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Shallow Bedrock Zone						
MW-01			Y	Y	Y	
MW-01B			Y	Y		
MW-11		Y	Y	Y	Y	
MW-22			Y	Y	Y	
MW-27			Y	Y		
MW-27B			Y	Y		
MW-44				Y		
MW-44B				Y		
Shallow Bedrock Subtotal:		1	6	8	3	0
Product Recovery Feature						
RW-01						Y
RW-02						Y ^h
RW-03						Y ^h
RW-04						Y ^h
RW-05						Y ^h
RW-06						Y
RW-07						Y ^h
RW-08						Y
RW-09						Y
RW-10						Y ^h
RW-11						Y
RW-12						Y
RW-14						Y
RW-15						Y ^h
RT-1A						Y
RT-1B						Y
RT-1C						Y
RS-01						Y ^h
RS-02						Y ^h
RS-04						Y
RS-05						Y ^h
RS-06						Y

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RS-07						Y
RS-08						Y
RS-09						Y
RS-10						Y
RS-11						Y
RS-12						Y
RS-13						Y
RS-14						Y ^h
RS-15						Y
RS-16						Y
RS-17						Y
RS-18						Y
RS-20						Y
Product Recovery Subtotal:						
Grand Totals:	13	37	79	97	21	35

Notes:

^a Frequency: Any alterations to the monitoring frequency will be proposed to the South Carolina Department of Environmental Services prior to December 31, 2025.

^b The second semiannual report will follow the December 2025 monitoring event.

^c The first semiannual report will follow the June 2025 monitoring event.

^d Sampling and Gauging: BTEX, MTBE, naphthalene, and 1,2-DCA by EPA Method 8260D.

^e Biodegradation Evaluation: Nitrate and Sulfate by EPA Method 9056A, ferrous iron and dissolved oxygen by field test analysis, carbon dioxide by method SM4500-CO2 D, methane by method RSK-175, and alkalinity by method SM2320B.

^f Parameter collected in the field.

^g Surface water location to be gauged at staff gauge.

^h Product recovery feature deployed in well.

1,2-DCA = 1,2-dichloroethane

BTEX = benzene, toluene, ethylbenzene, and xylenes

DO = dissolved oxygen

EPA = U.S. Environmental Protection Agency

MTBE = methyl tertiary butyl ether

Y = yes

Figures