

February 20, 2019

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Ms Bobbi Coleman
South Carolina Department of Health and Environmental Control
Assessment Section, UST Management Division
Bureau of Land and Waste Management
2600 Bull Street
Columbia, South Carolina 29201



2015
URP

Subject: Response to Comments in SCDHEC Letter Titled, "Response to Request for Well Permit to Install Additional Monitoring Wells, Advance a Soil Boring and Abandon Select Product Recovery Features Document", dated January 22, 2019
Plantation Pipe Line Company
Lewis Drive Remediation Site
Belton, South Carolina
Site ID #18693, "Kinder Morgan Belton Pipeline Release"

Dear Ms Coleman,

On behalf of Plantation Pipe Line Company (Plantation), CH2M HILL Engineers, Inc. (CH2M), part of Jacobs Engineering Group Inc. (Jacobs), has prepared this response to comments received from the South Carolina Department of Health and Environmental Control (SCDHEC) in the letter date-stamped January 22, 2019. Each SCDHEC comment is presented below, followed by Plantation's response.

Comment 1: *The Department concurs with the proposal to install two shallow wells (MW-56 & MW-57) in the areas south and west of MW-46 and a soil boring (SB-01) east of MW-38 to address contamination in these areas as noted in item 15 of the December 11, 2018 correspondence (Coleman to Aycock). Attached please find the monitoring well approval. A recommendation of additional assessment action should be provided based upon data collected from soil boring SB-01 within 60 days. As requested in the December 11, 2018 correspondence, the Department requests that groundwater collected from all newly installed monitoring wells are sampled monthly for the first 4 sampling events. Based upon those initial monthly events, sampling frequency can be evaluated.*

Response: Thank you for the monitoring well approval. Plantation will begin planning the installation of monitoring wells MW-55 (previously approved), MW-56, MW-57, and SB-01 during the first quarter of 2019. Plantation will provide a recommendation of additional assessment, if necessary, within 60 days of the receipt of analytical data from groundwater sampling of the new monitoring wells. To clarify what was stated in previous January 16, 2018 letter correspondence to SCDHEC (Comment 7), Plantation proposes that sampling frequency will be every six weeks for newly installed wells. After 5 events, sampling frequency will be reevaluated.

Comment 2: *In regards to the proposal to abandon 43 product recovery features, the Department requests that these points remain and continue to be monitored monthly as agreed to in the approved Corrective Action Plan to monitor the effectiveness of the current remediation system. Per the June 16,*

2017, December 14, 2017 and December 11, 2018 correspondence (Coleman to Aycock) measurable free phase petroleum product must be evacuated

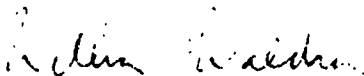
Response: The 43 product recovery features proposed to be removed were never intended for monitoring the effectiveness of the remediation system and they do not serve that purpose now. In addition, these features have become an eyesore and are detrimental to positive public perception of the site, especially along Brown's Creek. The expansive network of permanent monitoring wells has been installed to provide the ability to monitor groundwater flow and the effectiveness of the remediation system. The product recovery features proposed to be removed are no longer useful for their initial intended purpose, therefore, they will be removed.

Comment 3: *The Department requests that items 6 (iso-concentration maps and product thickness maps for the surficial aquifer and the bedrock aquifer for March 2017, September 2017, March 2018, September 2018, 711), 7 (an updated Groundwater Monitoring Well Plan Table), and 11 (an evaluation of the addition of oxygen releasing compounds to supplement the existing remedial measures in the area of Cupboard Creek) be provided within 30 days. These items were to be provided by December 30, 2018, as stated in the December 11, 2018 correspondence. To date they have not been received*

Response: The benzene isoconcentration and product thickness maps are included as attachments to this document. As stated in our last correspondence, the evaluation of oxygen releasing compounds (ORC) to supplement remedial measures in the Cupboard Creek area is currently conceptual and this alternative may not even be needed depending upon groundwater analytical results in the newly installed monitoring wells. Therefore, the ORC evaluation will be shared with SCDHEC at the next meeting as a concept that may be changed as the site conceptual model evolves. As stated in previous January 16, 2018 letter correspondence to SCDHEC (Comment 7), an updated Groundwater Monitoring Well Plan Table will be included in the next formal report instead of a stand-alone submittal.

If you have any further questions or concerns, please call me at (919) 859-5789, or Mr. Jerry Aycock/Plantation at (770) 751-4165.

Regards,



William M. Waldron, P.E.
Program Manager

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Mary Clair Lyons, Esq., Plantation (Digital, Mary_Lyons@kindermorgan.com)
Richard Morton, Esq., Womble Bond Dickinson, LLP (Digital, ric.morton@wbd-us.com)
File

Attachments:

- Figure 1 – Benzene Isoconcentration and Product Thickness Map, March 2017
- Figure 2 – Benzene Isoconcentration and Product Thickness Map, September 2017
- Figure 3 – Benzene Isoconcentration and Product Thickness Map, March 2018
- Figure 4 – Benzene Isoconcentration and Product Thickness Map, September 2018



LEGEND

- ★ Release Point
- ⊠ Bedrock Monitoring Well
- ⊙ Residuum Monitoring Well
- ⊕ Proposed Monitoring Well
- ⊖ Piezometer
- Surface Water Sampling Locations
- Vertical Bedrock Sparging Well
- Vertical Saprolite Sparging Well
- Newly Installed Vertical Sparging Wells
- ◆ Seep Location
- Recovery Well (4" diameter)
- △ Recovery Sump
- Recovery Trench Point
- Recovery Trench
- Surface Water Flow Direction
- Horizontal Sparging Well Riser
- Horizontal Sparging Well Screen
- Benzene at 10 ug/L in Groundwater, March 2017
- Benzene above 2.2 ug/L in Surface Water, March 2017
- Product Thickness >0.01', March 2017
- Product Thickness >0.1', March 2017
- National Hydrography Dataset Stream
- ⊞ Delineated Wetland

Base Map Sources:
 *Environmental Systems Research Institute (ESRI)
 ArcMap World Imagery, 2017. Basemap features are approximate.
 *United States Geological Survey (USGS) National Hydrography Dataset (NHD)

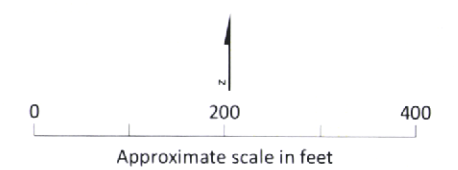


FIGURE 1. Benzene Isoconcentration and Product Thickness Map, March 2017
 Lewis Drive Remediation Site
 Belton, South Carolina
 Site ID #18693 "Kinder Morgan Belton Pipeline Release"



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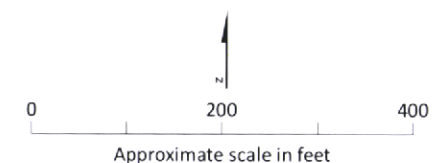


FIGURE 2. Benzene Isoconcentration and Product Thickness Map, September 2017
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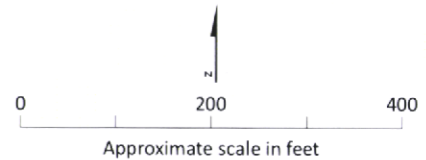


FIGURE 3. Benzene Isoconcentration and Product Thickness Map, March 2018
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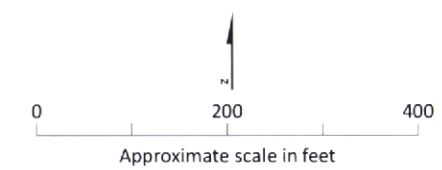


FIGURE 4. Benzene Isoconcentration and Product Thickness Map, September 2018
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