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October 25, 2021

*Delivered via Trackable Overnight Delivery*

Mr. Jeffery E. Mendenhall  
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

Subject: Request to Modify Groundwater Monitoring and Reporting Schedule in 2022  
Products (SE) Pipe Line Corporation  
Lewis Drive Remediation Site  
Belton, South Carolina  
Site ID #18693, "Kinder Morgan Belton Pipeline Release"

Dear Mr. Mendenhall,

On behalf of Products (SE) Pipe Line Corporation (PPL), Jacobs is submitting this letter to modify the number of groundwater monitoring and reporting events while maintaining the current number of groundwater monitoring locations 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 Health and Environmental Control (DHEC) over the last seven years to assess, remediate, and monitor conditions at the site, and has compiled a significant body of data that indicates overall decreasing trends in hydrocarbon concentrations and frequency of occurrence as shown in the Second Trimester 2021 Monitoring Report submitted to DHEC on October 1, 2021.

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 is currently expanding the existing air sparge network to include three new horizontal wells to treat areas in the Cupboard Creek Protection Zone and Browns Creek Protection Zone not currently in the direct influence of the air sparge system. The system is tentatively scheduled to begin operating in the first quarter of 2022.

The 2021 monitoring schedule includes 3 site-wide sampling events (1 annual and 2 trimester), 3 mid-trimester sampling events, and monthly surface water sampling events as presented in the Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2021 to December 31, 2021) submitted to DHEC on April 29, 2021 and accepted by DHEC on May 5, 2021 and the Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2020 to March 31, 2021) submitted to DHEC on April 22, 2020 and accepted by DHEC on August 13, 2020. PPL proposes to reduce groundwater sampling event frequency to 1 annual event, 1 biannual event, and 2 quarterly events.

The proposed 2022 annual event will be based on the Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2020 to March 31, 2021) annual event with the addition of MW-31B and MW-33. The proposed 2022 biannual event will be based on the Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2021 through December 31, 2021) trimester sampling events. The proposed 2022 quarterly events will be based on the Groundwater and

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Surface Water Monitoring and Reporting Plan (April 1, 2021 through December 31, 2021) mid-trimester sampling events with the addition of MW-14 and MW-14B. PPL will continue monthly surface water sampling events.

The proposed 2022 monitoring plan is presented in the attached Table 1. This proposed modification of the monitoring and reporting program, streamlined to include 4 groundwater events and 2 reports (annual and biannual), will allow additional funds to be focused on remediation activities.

Ideally, PPL would like to receive a response to this request prior to December 8, 2021. If approved, the first annual monitoring event would be scheduled for March 14 through 18, 2021.

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](mailto:greg_dempsey@kindermorgan.com))  
Mary Clair Lyons, Esq., PPL (Digital, [Mary\\_Lyons@kindermorgan.com](mailto:Mary_Lyons@kindermorgan.com))

Attachments:

- Table 1 – Groundwater and Surface Water Monitoring and Reporting Plan (January 1, 2022 to December 31, 2022)
- Figure 1 – Site Overview

**Table 1. Groundwater and Surface Water Monitoring and Reporting Plan (January 1, 2022 to December 31, 2022)**

Products (SE) Pipe Line Corporation

Lewis Drive Remediation Site, Belton, South Carolina

Site ID #18693 "Kinder Morgan Belton Pipeline Release"

Frequency <sup>a</sup> :	Sampling and Gauging				Biodegradation Evaluation	Product Gauging and Recovery
	Monthly (January 2022 to December 2022)	Quarterly (June 2022 and December 2022)	Biannually <sup>b</sup> (September 2022)	Annually (March 2022)	Annually <sup>c</sup> (March 2022)	Biannually and Annually (March and September 2022)
Analytes:	BTEX, MTBE, Naphthalene (and 1,2-DCA for Groundwater Samples Only) <sup>d</sup>				Nitrate <sup>e</sup> , Sulfate <sup>e</sup> , Ferrous Iron <sup>e,f</sup> , Carbon Dioxide <sup>e</sup> , Methane <sup>e</sup> , Alkalinity <sup>e</sup> , and DO <sup>e,f</sup>	Not Analyzed
<b>Feature ID</b>						
<b>Surface Water</b>						
SW-01 <sup>g</sup>	Y	Y	Y	Y		
SW-02 <sup>g</sup>	Y	Y	Y	Y		
SW-03 <sup>g</sup>	Y	Y	Y	Y		
SW-04	Y	Y	Y	Y		
SW-05 <sup>g</sup>	Y	Y	Y	Y		
SW-07	Y	Y	Y	Y		
SW-08 <sup>g</sup>	Y	Y	Y	Y		
SW-09	Y	Y	Y	Y		
SW-10 <sup>g</sup>	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
<b>Browns Creek Protection Zone</b>						
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		
Brown's Creek Subtotal:	0	7	17	21	7	0
<b>Cupboard Creek Protection Zone</b>						
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	14	16	3	0
<b>Hayfield Zone</b>						
MW-02				Y	Y	
MW-02B				Y		
MW-03				Y	Y	
MW-04			Y	Y	Y	
MW-05				Y		
MW-06				Y		

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MW-06B			Y	Y		
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 <sup>h</sup>	Y	Y		
MW-14B		Y <sup>h</sup>	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 <sup>i</sup>		
MW-32			Y	Y	Y	
MW-33				Y <sup>i</sup>		
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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<b>Shallow Bedrock Zone</b>						
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
<b>Product Recovery Feature</b>						
RW-01						Y
RW-02						Y <sup>h</sup>
RW-03						Y <sup>h</sup>
RW-04						Y <sup>h</sup>
RW-05						Y <sup>h</sup>
RW-06						Y
RW-07						Y <sup>h</sup>
RW-08						Y
RW-09						Y
RW-10						Y <sup>h</sup>
RW-11						Y
RW-12						Y
RW-14						Y
RW-15						Y <sup>h</sup>
RT-1A						Y
RT-1B						Y
RT-1C						Y
RS-01						Y <sup>h</sup>
RS-02						Y <sup>h</sup>
RS-04						Y
RS-05						Y <sup>h</sup>
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 <sup>h</sup>
RS-15						Y
RS-16						Y
RS-17						Y
RS-18						Y
RS-20						Y
Product Recovery Subtotal:						Y
<b>Grand Totals:</b>	<b>13</b>	<b>37</b>	<b>77</b>	<b>97</b>	<b>21</b>	<b>36</b>

Notes:

<sup>a</sup> Frequency: Any alterations to the monitoring frequency will be proposed to the South Carolina Department of Health and Environmental Control prior to December 31, 2022.

<sup>b</sup> The biannual report will follow the September 2022 monitoring event.

<sup>c</sup> The annual report will follow the March 2022 monitoring event.

<sup>d</sup> Sampling and Gauging: BTEX, MTBE, naphthalene, and 1,2-DCA by EPA Method 8260D.

<sup>e</sup> 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.

<sup>f</sup> Parameter collected in the field.

<sup>g</sup> Surface water location to be gauged at staff gauge.

<sup>h</sup> Indicates wells added to the quarterly event based on mid-trimester sampling events from the Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2021 through December 31, 2021).

<sup>i</sup> Indicates wells added to the annual event based on annual sampling events from the Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2020 through March 31, 2021).

<sup>h</sup> Product recovery feature deployed in well.

1,2-DCA = 1,2-dichloroethane

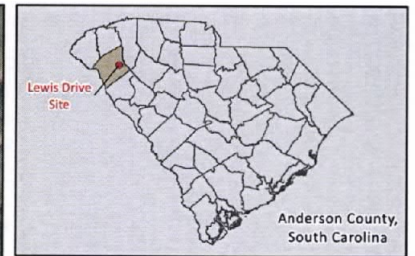
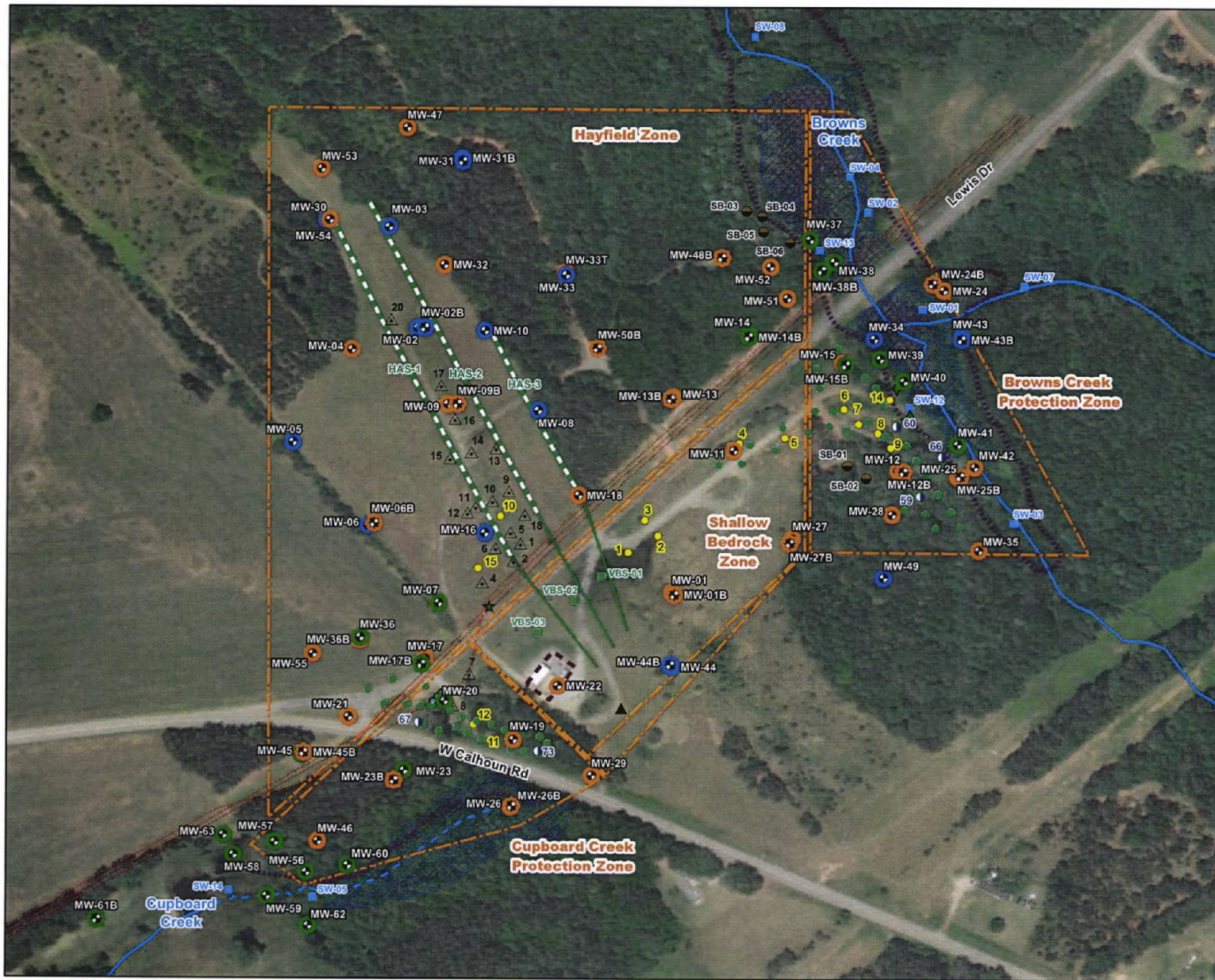
BTEX = benzene, toluene, ethylbenzene, and xylenes

DO = dissolved oxygen

EPA = U.S. Environmental Protection Agency

MTBE = methyl tertiary butyl ether

Y = yes



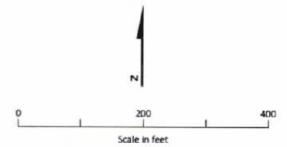
**LEGEND**

- ★ Release Point
- Bedrock Monitoring Well, Quarterly Sampling
- Bedrock Monitoring Well, Biannual Sampling
- Bedrock Monitoring Well, Annual Sampling
- Monitoring Well, Quarterly Sampling
- Monitoring Well, Biannual Sampling
- Monitoring Well, Annual Sampling
- Soil Boring
- Piezometer
- △ Recovery Sump
- Recovery Trench Point
- Recovery Well (4-inch diameter)
- Surface Water Sampling Location
- ▲ Septic Tank
- ◆ Seep Location
- Vertical Bedrock Sparging Well
- Vertical Saprolite Sparging Well
- Horizontal Sparging Well Riser
- Horizontal Sparging Well Screen
- Pipeline
- Waterbody
- Intermittent Stream
- ▭ Delineated Wetland
- ⋯ Inspection Route for Sheen or Distressed Vegetation
- ▭ AS System Compound
- ▭ Remediation Zone

**Note:**  
 All quarterly wells will be sampled biannually.  
 All quarterly and biannual samples will be sampled annually.

**Base Map Sources:**  
 Environmental Systems Research Institute (Esri)  
 ArcMap World Imagery, 2020. Basemap features are approximate.

United States Geological Survey (USGS) National Hydrography Dataset (NHD)



**Figure 1. Site Overview**  
 Lewis Drive Remediation Site  
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