



GREG DEMPSEY
PRODUCTS (SE) PIPELINE CORPORATION
1000 WINDWARD CONCOURSE
SUITE 450
ALPHARETTA GA 30005

MAR 09 2021

Re: Review of Second Trimester 2020 Monitoring Report
Products (SE) Pipeline - Lewis Drive Release, 112 Lewis Drive, Belton, SC
Anderson County
Site #18693
Second Trimester 2020 Monitoring Report received November 9, 2020
Meeting with Products (SE) Pipeline Corporation held February 26, 2020

Dear Mr. Dempsey,

The South Carolina Department of Health and Environmental Control (DHEC) has reviewed the report and offers the following comments and/or recommendations are provided:

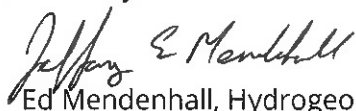
- 1) Due to the elevated water table at the site, ranging from 1.5' to 14.0' below ground surface, gauging for the presence of free phase product (FPP) will continue across the site and any FPP found will be removed.
- 2) If there is a change in site conditions such as increased product levels, product 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 5 new monitoring wells (4 residuum, 1 bedrock) are to be installed in the Cupboard Creek Zone before the next trimester sampling event. The sampling schedule for the new wells will be determined once installation is complete.
- 4) A proposal is to be submitted in writing as a Corrective Action Plan Addendum to DHEC for expansion of the air sparge system in the Brown's Creek and Cupboard Creek areas. The proposed expansion plan for the air sparge system will be submitting to DHEC for well construction approval. During the February 26, 2020 meeting, a brief proposal indicated that the expansion will include the installation of up to 3 new horizontal sparge wells. Two in the Browns Creek Zone and one in the Cupboard Creek Zone.
- 5) The current Annual Groundwater and Surface Water Sampling and Analysis Plan will continue until November 2021. The plan was originally to run from April 2020 to March 2021 and will now continue until November 2021 to monitor chemical of concern concentration during the shut down of the Hayfield Air Sparge System. The Hayfield Air Sparge Zone was shut down in October 2020 and at this time will remain shutdown until October 2021 unless start up is necessary following the next trimester sampling event in March or July 2021.

- 6) A new Groundwater and Surface Water Sampling and Analysis Plan will be submitted to DHEC by December 14, 2021. The new plan will be reviewed and approved so that the 2022 Sampling and Analysis Plan will run from January to December 2022 to replace the current site reporting schedule of April to March.

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 Products (SE) 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 Products (SE) Pipeline 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. 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
William Waldron, Jacobs, 111 Corning Road, Suite 116, Cary, NC 27518
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Technical File