



SEP 28 2020

JERRY AYCOCK
PLANTATION PIPELINE
1000 WINDWARD CONCOURSE
SUITE 450
ALPHARETTA GA 30005



Re: Review of 2020 Annual Monitoring Report (April 2019 through March 2020)
Plantation PipeLine - Lewis Drive Release, 112 Lewis Drive, Belton, SC
Anderson County
Site #18693
2020 Annual Monitoring Report received June 30, 2020

Dear Mr. Aycock,

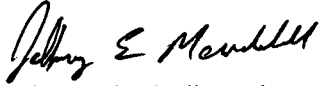
The South Carolina Department of Health and Environmental Control (DHEC) has reviewed the report and offers the following comments and/or recommendations are provided:

- 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) to be installed in the Cupboard Creek Zone are pending access approval by the property owner.
- 4) The oxidant injections conducted in August 2019 to reduce the contaminant concentrations in the vicinities of MW-38 and MW-46. While concentrations of chemicals of concern (CoCs) in these areas decreased following the injections, fourth quarter sampling data indicates a rebound of CoCs in both target areas. Additional corrective action is required in these areas.
- 5) A proposal will be submitted to DHEC for expansion of the air sparge system in the Brown's Creek area in the vicinity of MW-38. The proposal will be submitted once the Shallow Bedrock Air Sparging Testing on VBS-01, VBS-02 and VBS-03 is completed and the results evaluated.

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 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
Gary Poliakoff, Poliakoff & Associates, PO Box 1571, Spartanburg, SC 29304
Scott Lewis, 15 Edgewood Drive, Williamston, SC 29697
Eric Lewis, 421 Reedy Fork Road, Greenville, SC 29605
Technical File.