

**ROY COOPER**  
Governor

**ELIZABETH S. BISER**  
Secretary

**MICHAEL SCOTT**  
Director



**NORTH CAROLINA**  
*Environmental Quality*

October 19, 2021

Colonial Pipeline Company  
4295 Cromwell Road, #311  
Chattanooga, Tennessee 37421  
Attn. John Wyatt

Re: Notice of Regulatory Requirements  
N.C.G.S. § 143-214.1  
15A NCAC 02L .0106 & .0111  
15A NCAC 02L .0202

**Colonial Pipeline SR2448**  
SR 2488/Pipeline ROW  
Huntersville, NC  
Incident: **95827**  
Risk Classification: High

Mr. Wyatt:

On September 25, 2020, the Underground Storage Tank Section (UST Section), Division of Waste Management (DWM), of the Department of Environmental Quality (the Department) sent you a Notice of Violation (NOV) for the discharge of petroleum at the above-referenced location that caused the exceedance of the groundwater quality standards established pursuant to North Carolina General Statutes § 143-214.1 and codified in Title 15A of the North Carolina Administrative Code (NCAC), Subchapter 02L .0202.

The Department needs updated information on the risks associated with your release which must be performed by a North Carolina Licensed Geologist or Professional Engineer. The Department will use this information to perform risk evaluations and evaluate progress of the assessment and remediation of the release.

Per 15A NCAC 02L .0106 and .0111, please include the following information in groundwater monitoring reports, in accordance with the UST Section Guidelines for Assessment and Remediation, that are required to be submitted to the UST Section in the Mooresville Regional Office by the last day of each month:

1. Detailed information regarding predictive calculations for the estimation of contaminant mass in the soil expressed in gallons of free product.
2. A mass calculation summary table to include untreated captured soil, vapors, petroleum contact water (PCW), recovered light non-aqueous phase liquid (LNAPL), and excavated soil. Those specific calculations must be provided in an appendix. An evaluation of the mass calculations included in the text with supporting figures to show trends and relationships to groundwater elevations, LNAPL thickness and elevations, and other parameters. The mass calculations should also be provided as equivalent gallons of gasoline.
3. Any air sampling analytical results collected from the vapors routed via DR11 HDPE piping to the dual fuel burner oxidation unit. If this sampling is not being conducted, begin sampling monthly to calculate amount



North Carolina Department of Environmental Quality | Division of Waste Management  
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646  
919.707.8200

of mass being recovered and disposed of via thermal destruction. Report all data in a table format as described above.

4. There is a discrepancy between gauging and volume of free product reported by the disposal facilities. Please resolve the discrepancy and provide a method to determine the amount of free product in gallons and PCW in gallons leaving the site.
5. Please obtain PCW samples analyzed using EPA Method 6200B on at least a weekly basis and at least one sample analyzed by Method 537.1 modified (expanded list) for Perfluorinated Chemicals (PFAS) including Perfluorooctane sulfonate (PFOS) and Perfluorooctanesulfonic Acid (PFOA) constituents.
6. Include the following information in a PWC summary table:
  - a. Dates that PCW has been removed from the site.
  - b. The truck ID that can be referenced to a manifest and include all manifests that have not already been submitted.
  - c. Volume of PCW reported in gallons.
  - d. Also include analytical (including PFAS/PFOS/PFOA sampling) and disposal manifest relating to the table mentioned above as an appendix.
  - e. Detailed explanation of the calculation process with the information listed above reporting the percentage of free product per load.
  - f. Representative analytical information for each load and receiving disposal facility.
7. A table listing residential addresses connected to Charlotte Water by Colonial Pipeline identified in a table and on figures.
8. A listing of properties acquired and water connection information with the supply well identified in a table and on figures.
9. A summary table of all systems operations including enhanced SVE, product recovery, and hydraulic control including but not limited to flow, vacuum, vapor concentrations per the UST Section Corrective Action Guideline Reporting Tables (<https://deq.nc.gov/about/divisions/waste-management/ust/guidance-documents>).
10. A summary table and figures of daily fluid recovery rates and cumulative totals and a trend evaluation.
11. Outline the area of all excavated soil in the appropriate figure.
12. Measure fluid level rebound immediately following systems shut down and provide the results in an appendix with appropriate tables and figures.

The information stated above to be included in the monthly monitoring reports, in response to this Notice of Regulatory Requirements, is in addition to the required information stated in previous correspondence. Failure to comply with the State's rules in the manner and time specified may result in the assessment of civil penalties and/or the use of other enforcement mechanisms.

If you have any questions regarding the actions that must be taken or the rules mentioned in this letter, please contact me at 919-707-8200

Sincerely,



Michael E. Scott  
Director  
NC Division of Waste Management, NCDEQ

cc: Jeff Morrison, Colonial Pipeline  
Robert Hughes, Colonial Pipeline  
Vance Jackson, NCDEQ  
Scott Bullock, NCDEQ  
Ron Taraban, NCDEQ  
Laura Leonard, NCDEQ  
Wayne Randolph, NCDEQ  
Bobby Williams, Town of Huntersville  
Shawna Caldwell, LUESA- Mecklenburg County Health Department

