

Colonial Pipeline Company

Stan Carpenter, P.G. Environmental Manager Northeast District Office: 856-381-4683 scarpenter@colpipe.com

September 2, 2020

Lindley Campbell, Geologist, Oil Control Program Maryland Department of the Environment 1800 Washington Blvd, Suite 620 Baltimore, MD 21230

Re: Colonial Pipeline Company – Bel Air Station, Fallston, Maryland MDE Case# 18-0459-HA
Response to Request for Additional Information

Dear Ms. Campbell:

In correspondence dated July 22, 2020, the Maryland Department of Environment (MDE) requested that Colonial Pipeline Company (Colonial) submit information regarding an abandoned 30-inch diameter pipeline located on the east side of the entrance road to the Bel Air Station in Fallston, Maryland (the Site) no later than August 19, 2020. On August 17, 2020, Colonial requested and received approval from the MDE for a 2-week extension on the submission deadline. Information requested by the MDE is provided herein.

Background

Colonial installed the pipeline in the vicinity of the Site in the early- to mid-1960's. During a review of archived records, Colonial located a plan entitled "Bel Air Station, 30" & 8" Line Relocation Plan" (the Plan) with an amended date of July 1965. Historical records indicate the 30-inch diameter mainline, Line 03, and the 8-inch diameter delivery line, Line 36, which runs from the nearby Aberdeen Junction in Forest Hill, Maryland to third party terminals in the north Baltimore, Maryland area, were installed on the original right of way (ROW) prior to the construction of the Bel Air Station pumping loop, control building, and related electrical substation. After construction of the Bel Air Station, the lines were relocated and connected to the pumping station loop piping to activate the station. It is unknown why the station and related infrastructure were installed after the pipelines.

Based on the Plan, the 8-inch diameter Line 36 was excavated and relocated in its entirety from the original pre-1965 location to the current location and, therefore, is not addressed in this response. After construction of the station, 30-degree pipe bends were installed in the 30-inch diameter line to relocate/realign it approximately 48 feet to the west for connection with the pumping station (see gold

line in **Figure 1**). An approximately 900-feet section of the original pipeline, spanning from just uphill of the southern end of the station and running to the north near the station driveway entrance off of Charles Street, was bypassed by this realignment. As described below, certain sections of the abandoned 30-inch line were removed to accommodate final grading elevations within or near the station and to provide work space for the tie-in back to the original line on the north end (see green dash line in **Figure 1**) and the remainder of the pipeline was abandoned in place (see red line in **Figure 1**).

Specific responses are provided in italics to the MDE questions cited in bold below.

When was this abandoned pipeline last used?

The Plan suggests the abandoned sections of the 30-inch diameter line were last used in 1965.

When and why was it abandoned?

During construction of the pumping station, the historical line, which included the abandoned section, remained in operation. The sequencing of the pumping station construction and in-place abandonment or removal of the original pipeline section was likely a function of the concurrent construction of the pumping station and grading over the operating line. The pumping station and relocated and realigned pipelines were installed and tested prior to making the cutover to the pumping station and the subsequent abandonment of the 30-inch section of line beneath the newly regraded sections of the Site. Notes on the Plan indicate the temporary pipeline shutdown, cutover to the relocated lines servicing the pumping station, and abandonment or removal of the decommissioned section of pipeline occurred in October 1965.

The horizontal length/extent of the abandoned pipeline as it extends past the confines of the enclosed map?

Based on the Plan, it is estimated that approximately 575 feet of the original 900 feet were abandoned in place within the boundaries of the Site (see **Figure 1**). The remaining 325 were reportedly removed to accommodate regrading of the Site and/or to provide work space for the transition on the northern end of the pipeline back to the original footprint of the pipeline.

What methods were used to abandon the pipeline?

Pursuant to the Plan, the 30-inch diameter line was tapped for the installation of vent and control valves to allow for a controlled drain to the lower Site elevations near Charles Street. Pumps were connected to the valves and used to decant recovered product to trucks for off-site transport of the fungible commodity. After product was drained, the lines were mechanically cut and cleaned. Dry ice was used to inert the lines prior to welding a metal plate over the ends of the abandoned sections of 30-inch line. All bare pipe, welds, and damaged coating was primed and recoated with enamel. All work was performed under direct supervision of Colonial personnel.

How is the abandoned pipeline monitored?

The abandoned section of pipeline is not currently monitored.

Any subsurface investigation work performed in the area of the abandoned pipeline?

- In 2010, two transmix tanks were removed from the southern end of the Site (within the station fence line) in cooperation with the MDE. The tanks were located near the current sump and former footprint of the abandoned line. A Geoprobe rig was used to collect soil and groundwater samples, and the tanks were excavated to a depth of approximately 15 feet below ground surface (bgs). No evidence of a release was identified through the field observations or sample results in this area.
- In February 2018, a pig dig was completed to inspect an anomaly on the 30-inch diameter pipeline adjacent to the driveway and near where the abandoned line profile would have intersected the existing pipeline footprint. The excavation extended to a depth of approximately 10 feet bgs. There were no odors, stained soil, or sheens observed in the excavation that would suggest a current or historical release in this area.
- During the site investigation associated with the release identified in March 2018, several monitoring wells (MW), Geoprobe points (GP), and hand auger borings (HA) were installed in proximity to the abandoned line, including, MW-2 (GP-7), MW-3 (GP-10), MW-6, GP-6, GP-15, HA-7, and HA-13.

See Figure 2 for the location of the former investigation and field work locations.

Any other pertinent information.

In accordance with the Work Plan approved by the MDE in correspondence date August 12, 2020, several monitoring wells are proposed in proximity to the abandoned pipeline in both the inferred upgradient and downgradient groundwater flow directions.

If you have questions regarding the response to the Request for Additional Information, please don't hesitate to reach out to me.

Sincerely,

Stan H. Carpenter, P.G.

Stan Carpenter

Northeast District Environmental Manager

Colonial Pipeline Company

cc: Susan Bull – Maryland Department of the Environment



