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Your Name: Andrew Martin

Document Category: Facility

Document Group: Inspection/Investigation (I)

Document Type: Compliance Evaluation Inspection (CEI)

EPA ID: NCR000147280

Facility Name/Subject: Piedmont Natural Gas Huntersville LNG

Document Date: 06/03/2019

(or Inspection Date)

Description: Non-commercial TSD Inspection. No issues

Author: Andrew Martin

Branch/Unit: Compliance Branch-Western Region

Facility/Site Address: 11001 McCoy Road

Facility/Site City: Huntersville

Facility/Site State: North Carolina

Facility/Site Zipcode: 28078

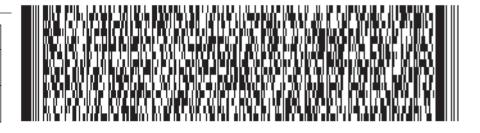
Facility/Site County: Mecklenburg

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STATE OF NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QULALITY DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

Facility Name - Piedmont Natural Gas Huntersville LNG

Facility Address – 11001 McCoy Road, Huntersville, NC 28078 (Mecklenburg County)

Facility Contact – Stephen Barrick (Duke Energy) – 980-373-8733

EPA ID Number – NCR 000 147 280

Inspector(s) – Andrew Martin – ESII NCDENR

Date of Inspection – June 3, 2019 **Last inspection Date** – March 29, 2018

Generator Status – CESOG

Inspection Type – Compliance Evaluation Inspection (CEI)

Present at Inspection - Stephen Barrick - Senior Environmental Specialist; Tony Bridges - PNG Plant Manager; Ken

Seizmore - Duke Energy' Robert Sapp - Duke Energy; HWS; Andrew Martin - ESII NCDEQ HWS

Facility Description: Piedmont Natural Gas Huntersville LNG (PNG) is a liquid natural gas extraction facility located in Huntersville, NC. There are eight buildings located within perimeter security fencing. A scheduled Compliance Evaluation Inspection (CEI) was conducted to review the condition of wells installed onsite for groundwater monitoring.

In 2008, spent filter material in the form of waste ceramic pellets, used to remove carbon dioxide from the gas line received by Piedmont Natural Gas, was discovered buried on PNG's property adjacent to a gas line right-of-way. This area was found to have benzene and trichloroethylene contamination. In 2009, an interim Closure Report prepared by MACTEC determined that three separate burial pits were in place with 790 tons of soil excavated. A March 23, 2010 Closure Report for the Filter Media Area provided information that an additional 6,350 tons of soil was excavated. On April 11, 2012, an Administrative Order on Consent was issued to PNG to develop a Site Assessment Plan to determine the lateral and vertical extent of groundwater contamination; a remedial strategy to set out a plan for developing and evaluating remedies for the impacted groundwater; a Site Wide Monitoring Program; design and implement a program to monitor contamination in an around the site; and develop a Remediation Program to implement the approved Remedial Strategy.

On July 12, 2017, PNG submitted a groundwater monitoring report for sampling activities conducted in April 2017. Data from the July 2017 report showed that contaminants were still detectable in site monitoring wells above NC 2L standards. The deadline to demonstrate "clean closure" passed and the Facility was transferred to the NCDEQ Hazardous Waste Section, Facility Management Branch for oversight.

Monitoring well MW-7S was abandoned on 10/16/2014 using 6.5 gallons of neat cement grout. The proactive steel, stick up casing, and concrete pad were removed.

At the time of the inspection, the facility was operating as a Conditionally Exempt Small Quantity Generator (CESQG).

Facility Description

- <u>Distance to closest residence</u> Approximately 0.2 miles
- <u>Distance to closest off-site well</u> Private drinking water wells on adjacent properties
- Water supply Charlotte Water
- <u>Sewage</u> Charlotte Water
- Operating shifts 3 shifts Monday Sunday (24/7)
- Number of employees Approximately 10
- Size of facility Approximately 471 acres.

Monitoring Well Semi-Annual Sampling Report – A groundwater monitoring report, dated July 2018 was reviewed. The report was written for well samples collected on April 18 through 20, 2017. It was discussed that monitoring wells were most recently sampled in October 2018 and the report was being prepared.

Monitoring Wells – After abandoning well MW-7S, PNG has one singe well, four sets of two wells and two sets of three wells, for a total of 15 wells. Each well is set at different depths. Based on AMEC Environment and Infrastructure February 2014 Groundwater Quality Map, wells with a "S" identifier were installed with a screened interval set in the overburden aquifer and wells with a "D" identifier were installed with a screen set in the upper bedrock aquifer. In total, all 15 wells were observed during the inspections, including: 1S, 1D, 2, 2D, 2S, 3S, 3D, 4S, 4D, 5S, 5D, 6S, 6D, 7D. All wells appeared to be in good condition. Concrete bollards have been installed near each set of wells. Monitoring well concrete pads were observed to be free of cracks and the well caps were locked. No signs of erosion were observed around the concrete pads. In addition, all of the wells are located within a monitored and locked fence.

The facility is currently scheduled to conduct semi-annual sampling. The facility inspects and documents each well for signs of erosion, cracking of the concrete base, well cap locked, and any other sign of damage or other concerns that should be corrected to maintain the integrity of the well. Any monitoring well inspection documents should be maintained onsite for future reference and review during annual RCRA inspections.

This facility is not subject to Financial Assurance regulations at this time.

Site Deficiencies – None.

new Matrix 6/3/2019

Sent via E-mail

RCRA Inspector / Date Facility Contact

Cc: Stephen Barrick - Duke Energy at Stephen.barrick@duke-energy.com

Sean Morris – Compliance Branch Western Unit Supervisor

Mike Babuin - Facility Management Branch

Central Office Files