

October 24, 2021

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Mr. Jeffrey E. Mendenhall  
South Carolina Department of Health and Environmental Control  
Assessment Section, UST Management Division  
Bureau of Land and Waste Management  
2600 Bull Street  
Columbia, South Carolina 29201



**Subject: Request for Modification of Product Recovery Activities  
Products (SE) Pipe Line Corporation (PPL)  
Lewis Drive Remediation Site  
Belton, South Carolina  
Site ID #18693, "Kinder Morgan Belton Pipeline Release"**

Dear Mr. Mendenhall,

On behalf of Products (SE) Pipe Line Corporation (PPL), Jacobs has prepared this correspondence to request a modification to the product recovery activities currently conducted at the Lewis Drive Site in Belton, Anderson County, South Carolina (Site ID #18693).

The biosparging system has been operating since March 2017 and remediation through air sparging has been highly successful. The amount of free product being recovered using vacuum extraction methods started markedly declining in September 2017. From September 1, 2017 to February 19, 2018, only 21 gallons per month were recovered at the site<sup>1</sup>. This marked the end of the vacuum extraction product recovery methods.

Since February 20, 2018, product has been continuously recovered from product recovery features using passive skimmers and petroleum-only absorbent socks (Figure 1), in accordance with the Product Recovery Plan, Revision 4 (CH2M, 2018), approved by the South Carolina Department of Health and Environmental Control (DHEC) letter dated May 8, 2018. Product collection frequency changed from monthly to quarterly after the June 3, 2019 product recovery event, in accordance with the DHEC approved, 2019 Annual Monitoring, Reporting, and Product Recovery Plan (April 1, 2019 through March 31, 2020), dated May 3, 2019. Since the implementation of the passive recovery methods in February 2018, the amount of product recovered has declined further and has reached a point of diminishing returns (Table 1). Recovery volumes for the four quarters of 2019 were 2.43 gallons, 1.42 gallons, 0.074 gallons, and 0.022 gallons, respectively. Product collection frequency changed from quarterly to tri-annually after the March 10, 2020 product recovery event, in

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<sup>1</sup> CH2M. 2018. *Lewis Drive – December 2017 Monthly Status Update, Plantation Pipe Line Company, Belton, South Carolina, Site ID #18693, "Kinder Morgan Belton Pipeline Release"*. January 18.

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Subject: Request for Modification of Product Recovery Activities

accordance with the DHEC approved, Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2020 to March 31, 2021), dated August 13, 2020 and DHEC approved Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2021 to December 31, 2021), dated May 5, 2021. Recovery volume for the year 2020 was 0.002 gallons and the recovery volume for 2021 year to date is 0.032 gallons. In July 2021, for the first time since gauging began in 2015, there was no measurable product thicknesses at any of the monitoring well locations or recovery features, see Table 2).

Furthermore, product thickness data (Attachment A) indicate that the air sparging curtains established in the Browns Creek Protection Zone and Cupboard Creek Protection Zone have halted migration of product toward these surface water bodies and there is significantly less risk due to no measurable product detected during the July 2021 gauging event. The well screens of the locations with product recovery features consistently bracket the water table, providing accurate opportunities for measuring product thicknesses (Attachment A).

Based on the information presented herein, we propose removing the passive skimmers from the recovery features at the site and replacing the passive skimmers with petroleum absorbent socks. These features will continue to be monitored for presence of free product in accordance with the proposed Groundwater and Surface Water Monitoring and Reporting Plan (January 1, 2022 to December 31, 2022) submitted to DHEC on October 1, 2021. If collectible product is detected on the absorbent socks, the product will be measured and documented by compressing sock contents into a measuring cup, and then transferring the product to a graduated cylinder.

If you have any further questions or concerns, please call me at (919) 859-5789, or Greg Dempsey/PPL at (770) 751-4143.

Regards



**William M. Waldron, P.E.**

Program Manager

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Mary Clair Lyons, Esq., PPL (Digital, [mary\\_lyons@kindermorgan.com](mailto:mary_lyons@kindermorgan.com))

Attachments:

Table 1 – Product Skimmer Recovery Results  
Table 2 – Groundwater Elevation and Product Thickness Data  
Figure 1 – Site Features with Product Recover Features  
Attachment A – Product Thickness Trends

## Tables

**Table 1. Product Skimmer Recovery Results**  
*Products (SE) Pipe Line Corporation*  
*Lewis Drive Remediation Site, Belton, South Carolina*  
*Site ID #18693 "Kinder Morgan Belton Pipeline Release"*

Well ID	Week 1 Volume Recovered (gal)	Week 2 Volume Recovered (gal)	Week 3 Volume Recovered (gal)	Week 4 Volume Recovered (gal)	Month 1 Volume Recovered (gal)	Month 2 Volume Recovered (gal)	Month 3 Volume Recovered (gal)	Month 4 Volume Recovered (gal)	Month 5 Volume Recovered (gal)	Month 6 Volume Recovered (gal)	Month 7 Volume Recovered (gal)	Month 8 Volume Recovered (gal)	Month 9 Volume Recovered (gal)	Month 10 Volume Recovered (gal)	Month 11 Volume Recovered (gal)	Month 12 Volume Recovered (gal)
Date	2/20/2018	2/26/2018	3/9/2018	3/15/2018	4/6/2018	5/3/2018	6/7/2018	7/13/2018	8/1/2018	9/11/2018	10/5/2018	11/1/2018	12/4/2018	1/22/2019	2/19/2019	3/7/2019
<b>Product Skimmers</b>																
MW-08	-	-	-	-	0.001	-	-	-	-	-	-	-	-	-	-	-
MW-15	-	-	0.023	0.004	-	-	-	-	-	-	-	-	-	-	-	-
MW-20	0.004	0.017	0.016	-	0.002	-	0.008	-	-	-	-	-	-	-	-	-
RS-01	NA	NA	0.031	0.008	-	-	-	0.031	0.016	0.008	-	0.002	-	-	0.000	-
RS-02	-	-	0.001	-	-	-	0.008	0.016	0.016	-	-	0.002	-	-	0.000	-
RS-05	0.844	0.813	1.094	1.125	0.031	0.002	0.008	0.004	0.023	0.016	0.004	0.002	0.002	-	0.000	0.000
RS-10	0.002	-	-	-	0.008	-	-	-	0.004	0.002	0.000	-	-	-	-	0.000
RS-14	0.016	-	-	-	-	-	0.008	0.002	0.004	-	-	-	-	-	0.000	0.000
RS-17	-	-	0.001	-	-	-	0.008	0.002	-	-	-	-	-	-	-	0.000
RW-02	-	0.090	0.047	-	0.033	-	0.008	0.001	0.016	0.023	-	-	0.002	-	0.002	-
RW-03	-	-	0.008	0.008	0.002	-	0.008	0.001	0.004	0.006	0.000	-	-	0.055	-	0.141
RW-04	-	0.008	0.016	-	0.001	-	0.016	0.023	0.008	-	0.000	-	-	-	-	0.000
RW-05	-	0.016	0.016	0.656	-	0.001	0.018	-	0.047	0.031	0.508	0.000	0.156	-	0.000	-
RW-07	0.002	-	0.008	-	-	-	-	-	0.004	0.001	-	-	-	-	-	-
RW-08	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RW-15	0.078	-	-	0.117	0.031	0.002	-	0.008	-	0.002	0.000	-	-	-	-	0.000
RW-10	-	-	-	-	-	-	-	0.234	0.004	-	-	-	0.002	-	-	0.000
<b>Petroleum-Absorbent Socks</b>																
MW-11	0.200	0.224	-	0.256	0.200	0.008	0.221	-	-	-	-	-	-	-	-	-
RS-08	-	-	-	-	0.243	0.040	0.016	0.224	-	-	0.211	0.125	0.144	0.265	0.226	0.025
RT-2K	-	-	-	-	0.006	0.006	0.209	0.152	0.187	-	0.051	0.021	0.004	-	0.143	0.095
RT-1A	-	-	-	-	0.228	0.036	0.254	0.205	0.233	0.131	0.039	-	0.120	0.224	0.208	0.049
RT-1B	-	-	-	-	0.251	0.038	0.244	0.235	0.212	-	-	0.009	0.021	0.247	0.210	0.063
RT-1C	-	-	-	-	0.255	0.039	0.231	0.201	0.069	0.041	-	0.102	-	0.224	0.195	0.055
<b>Total:</b>	<b>1.145</b>	<b>1.167</b>	<b>1.259</b>	<b>2.174</b>	<b>1.291</b>	<b>0.171</b>	<b>1.263</b>	<b>1.337</b>	<b>0.845</b>	<b>0.259</b>	<b>0.815</b>	<b>0.262</b>	<b>0.450</b>	<b>1.014</b>	<b>0.985</b>	<b>0.429</b>

Notes:

- = no product recovered
- gal = gallons
- ID = identification
- MW = monitoring well
- RS = recovery sump
- RT = recovery trench
- RW = recovery well
- YTD = year to date

**1Q 2018  
Total  
5.75**

**2Q 2018  
Total  
2.73**

**3Q 2018  
Total  
2.44**

**4Q 2018  
Total  
1.53**

**1Q 2019  
Total  
2.43**



**Table 1. Product Skimmer Recovery Results**

Products (SE) Pipe Line Corporation

Lewis Drive Remediation Site, Belton, South Carolina

Site ID #18693 "Kinder Morgan Belton Pipeline Release"

Well ID	Month 13 Volume Recovered (gal)	Month 14 Volume Recovered (gal)	Month 15 Volume Recovered (gal)	Month 16 Volume Recovered (gal)	Month 17 Volume Recovered (gal)	Month 18 Volume Recovered (gal)	Month 19 Volume Recovered (gal)	Month 20 Volume Recovered (gal)	Month 21 Volume Recovered (gal)	Month 22 Volume Recovered (gal)	Total Recovered to Date (gal)	Notes
Date	4/8/2019	5/16/2019	6/3/2019	9/17/2019	12/16/2019	3/9/2020	7/6/2020	11/10/2020	3/23/2021	7/12/2021		
<b>Product Skimmers</b>												
MW-08	-	-	-	-	-	-	-	-	-	-	0.001	Removed skimmer from MW-08 -- 6/7/18
MW-15	-	-	-	-	-	-	-	-	-	-	0.027	Removed skimmer from MW-15 -- 6/7/18
MW-20	-	-	-	-	-	-	-	-	-	-	0.046	Removed skimmer from MW-20 -- 6/7/18
RS-01	-	-	-	-	-	-	-	-	-	-	0.095	Difficulty inserting 4-liter product skimmer, replaced with 1-liter product skimmer
RS-02	0.002	0.006	-	-	-	-	-	-	-	-	0.049	
RS-05	0.002	0.002	0.002	0.004	-	-	-	-	-	-	3.976	
RS-10	-	-	-	-	-	-	-	-	-	-	0.016	
RS-14	-	0.001	-	-	-	0.002	-	-	-	-	0.032	
RS-17	-	-	-	-	-	-	-	-	-	-	0.010	
RW-02	-	-	0.002	-	-	-	0.001	-	-	0.008	0.230	
RW-03	0.102	0.002	0.070	0.008	0.002	-	-	-	0.016	0.008	0.438	
RW-04	-	-	0.004	-	0.004	-	-	-	-	-	0.079	
RW-05	-	-	0.039	0.063	0.001	-	-	-	-	-	1.551	
RW-07	-	-	-	-	0.016	-	-	-	-	-	0.030	
RW-08	-	-	-	-	-	-	-	-	-	-	-	Removed skimmer from RW-08 - third quarter 2020
RW-15	-	-	-	-	-	-	-	-	-	-	0.238	
RW-10	-	-	-	-	-	-	-	-	-	-	0.240	
<b>Petroleum-Absorbent Socks</b>												
MW-11	-	-	-	-	-	-	-	-	-	-	1.109	Removed sock from MW-11 -- 6/7/18
RS-08	0.012	0.220	-	-	-	-	-	-	-	-	1.751	Difficulty inserting product skimmer, replaced with sock
RT-2K	-	0.093	-	-	-	-	-	-	-	-	0.967	Location removed during trench removal in Sept 2020
RT-1A	0.114	0.235	-	-	-	-	-	-	-	-	2.075	Difficulty inserting product skimmer, replaced with sock
RT-1B	-	0.240	-	-	-	-	-	-	-	-	1.769	Difficulty inserting product skimmer, replaced with sock
RT-1C	0.121	0.120	0.035	-	-	-	-	-	-	-	1.689	Difficulty inserting product skimmer, replaced with sock
<b>Total:</b>	<b>0.353</b>	<b>0.918</b>	<b>0.152</b>	<b>0.074</b>	<b>0.022</b>	<b>0.002</b>	<b>0.001</b>	<b>-</b>	<b>0.016</b>	<b>0.016</b>	<b>16.419</b>	

2Q 2019 Total	3Q 2019 Total	4Q 2019 Total	2020 Total	2021 Total YTD
1.42	0.074	0.022	0.002	0.032

**Table 2. Groundwater Elevation and Product Thickness Data***Products (SE) Pipe Line Corporation**Lewis Drive Remediation Site, Belton, South Carolina**Site ID #18693 "Kinder Morgan Belton Pipeline Release"*

Location ID	Date	Depth to Product (ft btoc)	Depth to Water (ft btoc)	Product Thickness (ft)	Top of Casing Elevation (ft amsl)	Ground Elevation (ft amsl)	Corrected Groundwater Elevation (ft amsl)	Notes
MW-01	7/13/2021		7.93	0	853.0653	850.2458	845.1353	
MW-01B	7/13/2021		9.12	0	852.9893	850.4548	843.8693	
MW-04	7/13/2021		12.31	0	844.4195	844.5139	832.1095	
MW-06B	7/13/2021		12.8	0	852.57	852.42	839.77	
MW-07	7/13/2021		11.75	0	853.0165	853.0203	841.2665	
MW-08	7/13/2021		11.66	0	844.7245	844.7546	833.0645	
MW-09	7/13/2021		7.64	0	843.632	843.721	835.992	
MW-09B	7/13/2021		10	0	843.92	843.71	833.92	
MW-11	7/13/2021		27.55	0	855.6293	852.3603	828.0793	
MW-12	7/13/2021		12.5	0	834.5326	832.2022	822.0326	
MW-12B	7/13/2021		12.74	0	834.9765	832.2594	822.2365	
MW-13	7/13/2021		20.19	0	848.8442	845.9266	828.6542	
MW-13B	7/13/2021		20.91	0	849.8226	847.1858	828.9126	
MW-14	7/13/2021		15.25	0	838.703	836.4723	823.453	
MW-14B	7/13/2021		16.12	0	840.2004	837.1165	824.0804	
MW-15	7/13/2021		9.98	0	831.0308	828.6784	821.0508	
MW-15B	7/13/2021		14.02	0	831.2854	828.6578	817.2654	
MW-17	7/13/2021		10.86	0	855.3467	855.3206	844.4867	
MW-17B	7/13/2021		14.11	0	855.3697	855.373	841.2597	
MW-18	7/13/2021		12.73	0	846.8852	846.8221	834.1552	
MW-19	7/13/2021		10.08	0	853.9354	851.2326	843.8554	
MW-20	7/13/2021		10.51	0	852.8853	853.0717	842.3753	
MW-21	7/13/2021		14.75	0	855.7672	855.6813	841.0172	slight sheen
MW-22	7/13/2021		8.85	0	854.6018	854.6217	845.7518	
MW-23	7/13/2021		8.72	0	849.569	846.6621	840.849	
MW-23B	7/13/2021		7.48	0	849.6873	846.8071	842.2073	
MW-24	7/13/2021		2.6	0	817.9204	815.7205	815.3204	
MW-24B	7/13/2021		3.53	0	818.7153	815.8289	815.1853	
MW-25	7/13/2021		7.06	0	826.1804	823.4635	819.1204	
MW-25B	7/13/2021		4.18	0	823.8056	822.5878	819.6256	
MW-26	7/13/2021		4.45	0	847.5644	844.762	843.1144	
MW-26B	7/13/2021		7.48	0	847.8085	844.8059	840.3285	
MW-27	7/13/2021		23.97	0	854.1116	854.2167	830.1416	
MW-27B	7/13/2021		26.84	0	857.1394	854.2667	830.2994	
MW-28	7/13/2021		20.92	0	844.3146	841.4919	823.3946	
MW-29	7/13/2021		7.47	0	852.1964	852.0694	844.7264	
MW-32	7/13/2021		14.43	0	842.9284	839.8145	828.4984	
MW-33T	7/13/2021		25.84	0	849.1054	846.152	823.2654	

**Table 2. Groundwater Elevation and Product Thickness Data**

Products (SE) Pipe Line Corporation

Lewis Drive Remediation Site, Belton, South Carolina

Site ID #18693 "Kinder Morgan Belton Pipeline Release"

Location ID	Date	Depth to Product (ft btoc)	Depth to Water (ft btoc)	Product Thickness (ft)	Top of Casing Elevation (ft amsl)	Ground Elevation (ft amsl)	Corrected Groundwater Elevation (ft amsl)	Notes
MW-35	7/13/2021		8.34	0	829.404	826.2151	821.064	
MW-36	7/13/2021		17.29	0	858.4668	858.6614	841.1768	
MW-36B	7/13/2021		16.9	0	858.1513	858.4855	841.2513	
MW-37	7/13/2021		2.93	0	813.92	810.93	810.99	
MW-38	7/13/2021		0.45	0	813.28	810.49	812.83	
MW-38B	7/13/2021		3.08	0	815.87	813.23	812.79	
MW-39	7/13/2021		3.59	0	819.9	816.92	816.31	
MW-40	7/13/2021		1.13	0	817.79	814.75	816.66	surrounded by high surface water
MW-41	7/13/2021		3.21	0	819.68	816.67	816.47	
MW-42	7/13/2021		4.04	0	820.33	817.31	816.29	
MW-45	7/13/2021		12.18	0	852.47	852.393	840.29	
MW-45B	7/13/2021		13.39	0	852.846	852.687	839.456	
MW-46	7/13/2021		7.56	0	845.47	842.43	837.91	wasp nest sprayed nest with wasp killer
MW-47	7/13/2021		18.04	0	842.98	839.89	824.94	
MW-48B	7/13/2021		16.75	0	832.34	829.53	815.59	
MW-50B	7/13/2021		20.87	0	850.34	847.11	829.47	
MW-51	7/13/2021		17.62	0	831.92	828.77	814.3	
MW-52	7/13/2021		16.17	0	830.09	826.72	813.92	
MW-53	7/13/2021		11.43	0	837.37	837.24	825.94	
MW-54	7/13/2021		14.19	0	840.79	840.83	826.6	
MW-55	7/13/2021		19.05	0	859.71	859.84	840.66	
MW-56	7/13/2021		6.62	0	843.94	840.71	837.32	
MW-57	7/13/2021		8.3	0	845.63	842.5	837.33	
MW-58	7/13/2021		1.95	0	838.78	838.88	836.83	
MW-59	7/13/2021		0.8	0	837.46	837.69	836.66	
MW-60	7/13/2021		6.59	0	844.88	841.95	838.29	
MW-61B	7/13/2021		2.05	0	836.98	837.18	834.93	
MW-62	7/13/2021		2.69	0	839.27	839.37	836.58	
MW-63	7/13/2021		4.63	0	841.72	841.96	837.09	
RS-01	7/13/2021		10.62	0	849.13	847.9473	838.51	
RS-02	7/13/2021		9.35	0	849.52	848.5405	840.17	
RS-04	7/13/2021		9.79	0	851.47	850.3582	841.68	
RS-05	7/13/2021		10.07	0	848.31	847.1385	838.24	
RS-06	7/13/2021		10.26	0	849.47	848.2458	839.21	
RS-07	7/13/2021		11.31	0	855.083	854.0618	843.773	repair, pvc is loose not screwed on
RS-08	7/13/2021		12.42	0	854.24	852.65	841.82	
RS-09	7/13/2021		10.67	0	847.6	846.7547	836.93	
RS-10	7/13/2021		6.23	0	847.42	846.2808	841.19	

**Table 2. Groundwater Elevation and Product Thickness Data**

Products (SE) Pipe Line Corporation

Lewis Drive Remediation Site, Belton, South Carolina

Site ID #18693 "Kinder Morgan Belton Pipeline Release"

Location ID	Date	Depth to Product (ft btoc)	Depth to Water (ft btoc)	Product Thickness (ft)	Top of Casing Elevation (ft amsl)	Ground Elevation (ft amsl)	Corrected Groundwater Elevation (ft amsl)	Notes
RS-11	7/13/2021		8.56	0	847.44	846.3456	838.88	
RS-12	7/13/2021		8.88	0	847.74	846.5831	838.86	
RS-13	7/13/2021		9.9	0	845.98	845.39	836.08	
RS-14	7/13/2021		8.42	0	845.97	844.664	837.55	
RS-15	7/13/2021		7.44	0	846.77	845.26	839.33	
RS-16	7/13/2021		8.56	0	845.44	844.5564	836.88	
RS-17	7/13/2021		6.05	0	844.22	843.2901	838.17	cap damaged may have a blockage
RS-18	7/13/2021		10.84	0	847.89	846.8236	837.05	
RS-20	7/13/2021		9.76	0	842.69	841.7277	832.93	
RT-1A	7/13/2021		11.71	0	854.06	852.863	842.35	
RT-1B	7/13/2021		11.73	0	854.15	853.2903	842.42	
RT-1C	7/13/2021		12.29	0	854.55	853.5465	842.26	
RW-01	7/13/2021		12.47	0	851.9241	849.4864	839.4541	
RW-02	7/13/2021		21.14	0	852.6891	850.217	831.5491	
RW-03	7/13/2021		21.56	0	852.3388	850.0252	830.7788	
RW-04	7/13/2021		27.47	0	853.9321	852.1503	826.4621	
RW-05	7/13/2021		31.18	0	853.5334	850.9948	822.3534	
RW-06	7/13/2021		24.12	0	846.2084	844.2137	822.0884	
RW-07	7/13/2021		21.12	0	843.1919	841.0149	822.0719	
RW-08	7/13/2021		14.26	0	835.478	833.4564	821.218	
RW-09	7/13/2021		11.63	0	835.1231	831.1326	823.4931	
RW-10	7/13/2021		12.1	0	848.5325	846.7642	836.4325	
RW-11	7/13/2021		9.52	0	852.9675	851.0263	843.4475	
RW-12	7/13/2021		9.43	0	854.4858	851.6398	845.0558	
RW-14	7/13/2021		0	0	827.5403	826.2492	827.5403	
RW-15	7/13/2021		12.65	0	851.6374	849.476	838.9874	
SW-01	7/14/2021		-3.1	0		812.82	815.92	
SW-02	7/14/2021		-2	0		808.65	810.65	
SW-03	7/14/2021		-1.68	0		815.09	816.77	
SW-08	7/14/2021		-0.84	0		802.04	802.88	

Notes:

ft = foot/feet

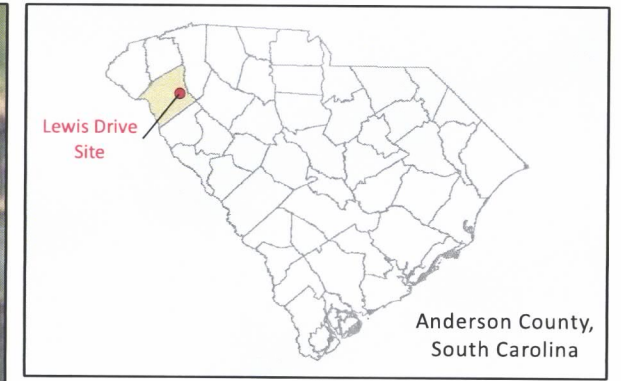
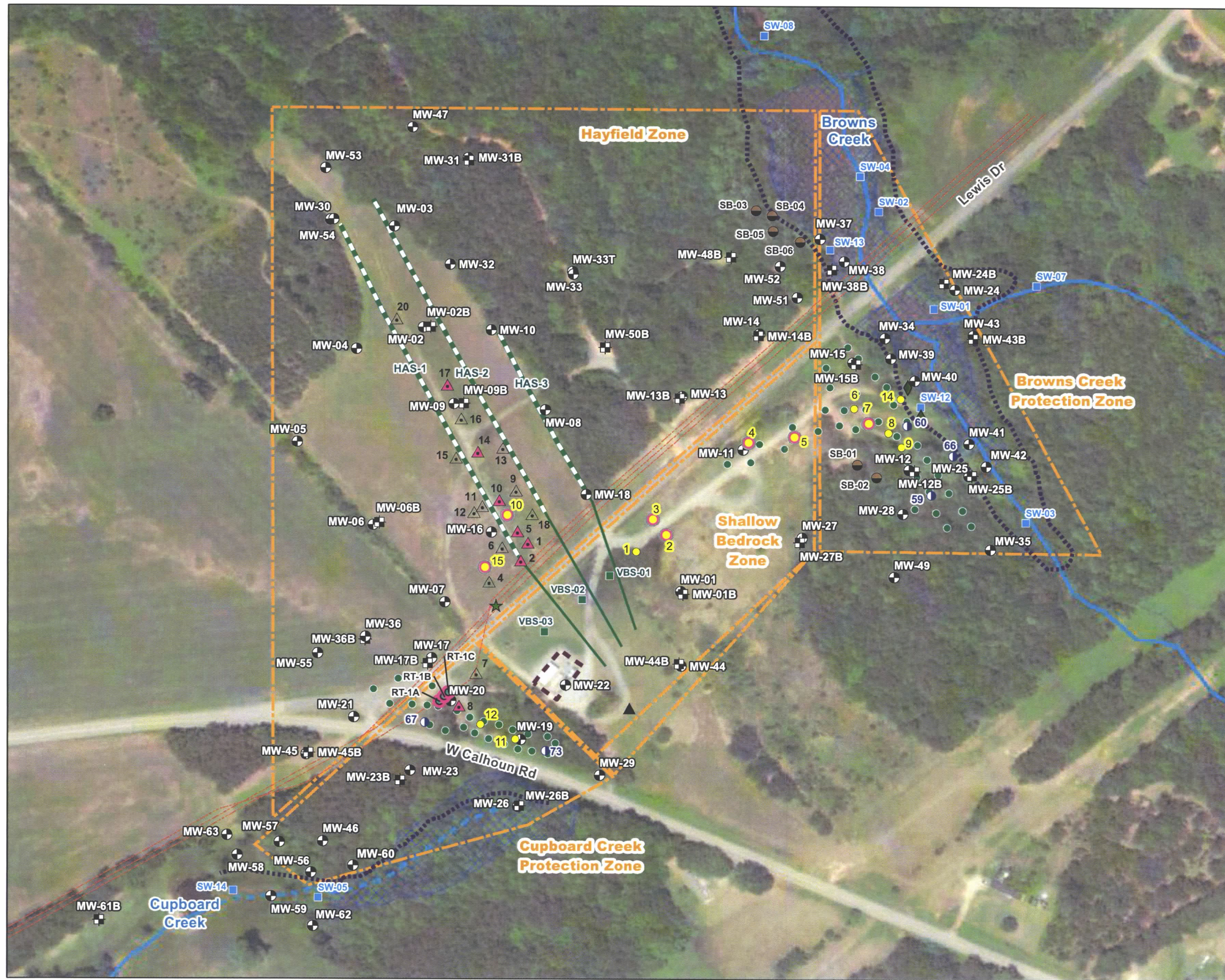
ft amsl = foot/feet above mean sea level

ft btoc = foot/feet below top of casing

ID = identification

## Figures





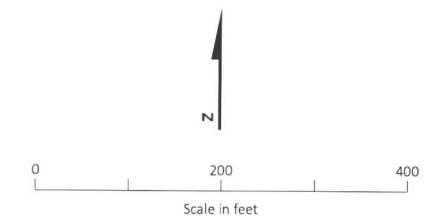
**LEGEND**

★ Release Point	■ Vertical Bedrock Sparging Well
▲ Recovery Sump with Product Recovery Features	● Vertical Saprolite Sparging Well
△ Recovery Sump without Product Recovery Features	— Horizontal Sparging Well Riser
○ Recovery Trench with Product Recovery Features	— Horizontal Sparging Well Screen
○ Recovery Well with Product Recovery Features	— Pipeline
○ Recovery Well without Product Recovery Features	— Waterbody
○ Monitoring Well	— Intermittent Stream
■ Bedrock Monitoring Well	⊠ Delineated Wetland
● Soil Boring	⋯ Inspection Route for Sheen or Distressed Vegetation
○ Piezometer	■ AS System Compound
■ Surface Water Sampling Location	□ Remediation Zone
▲ Septic Tank	
◆ Seep Location	

**Note:**  
 All quarterly wells will be sampled biannually.  
 All quarterly and biannual samples will be collected annually.

**Base Map Sources:**  
 Environmental Systems Research Institute (Esri)  
 ArcMap World Imagery, 2020. Basemap features are approximate.

United States Geological Survey (USGS) National Hydrography Dataset (NHD)

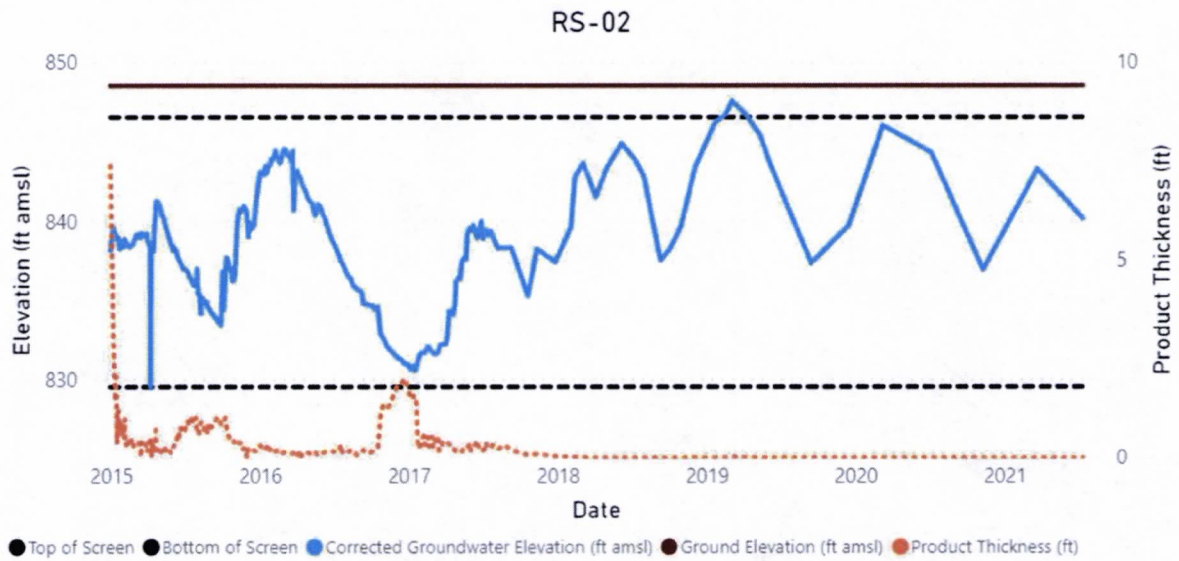
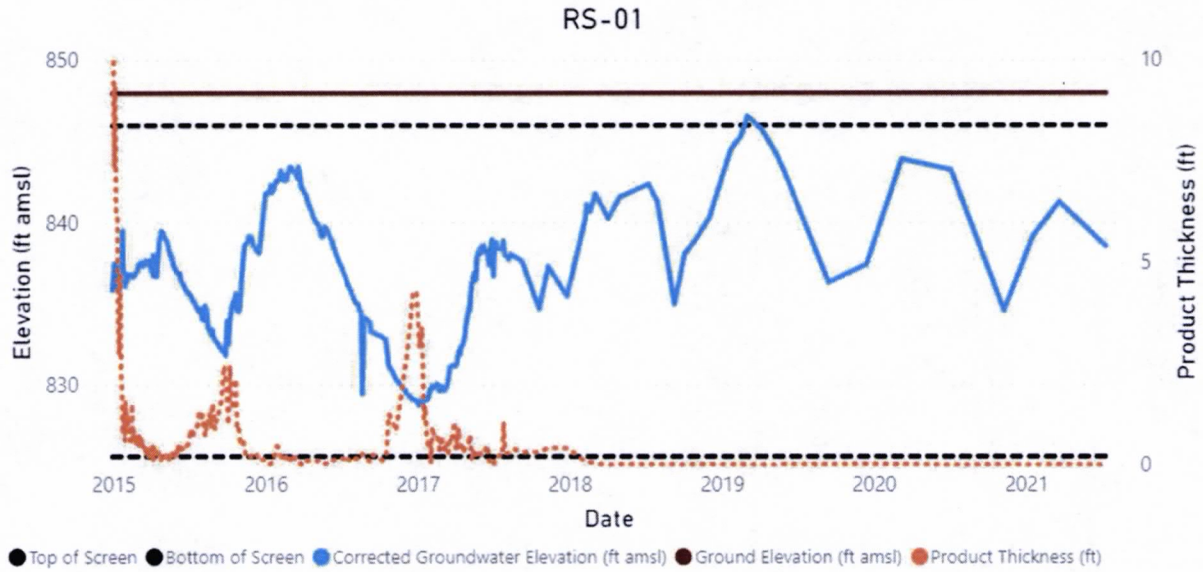


**Figure 1. Site Features with Product Recovery Features**  
 Lewis Drive Remediation Site  
 Belton, South Carolina  
 Site ID #18693 "Kinder Morgan Belton Pipeline Release"



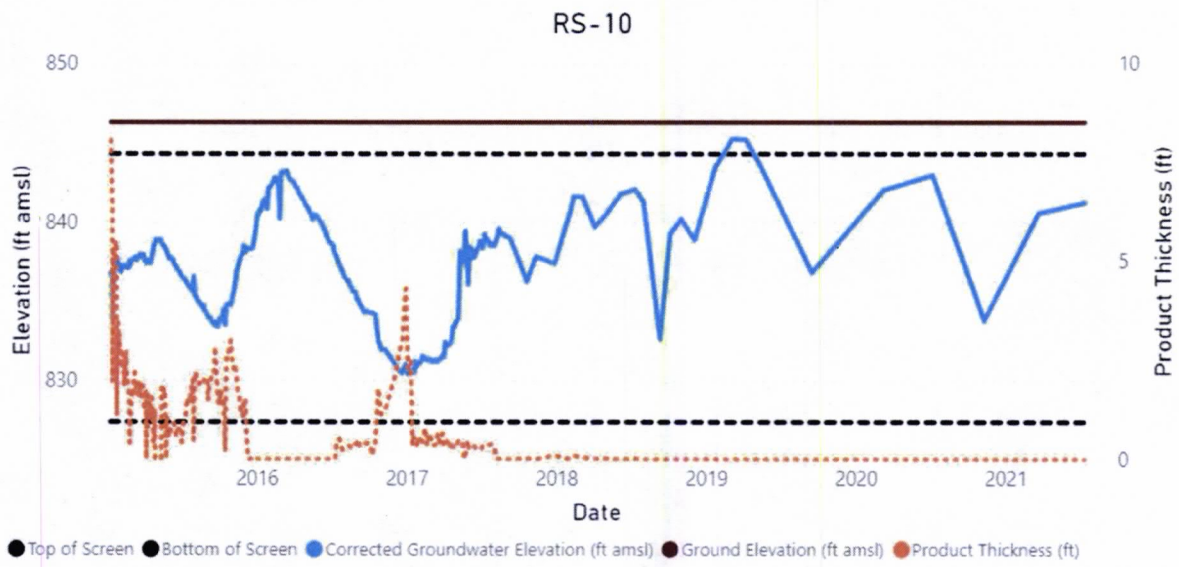
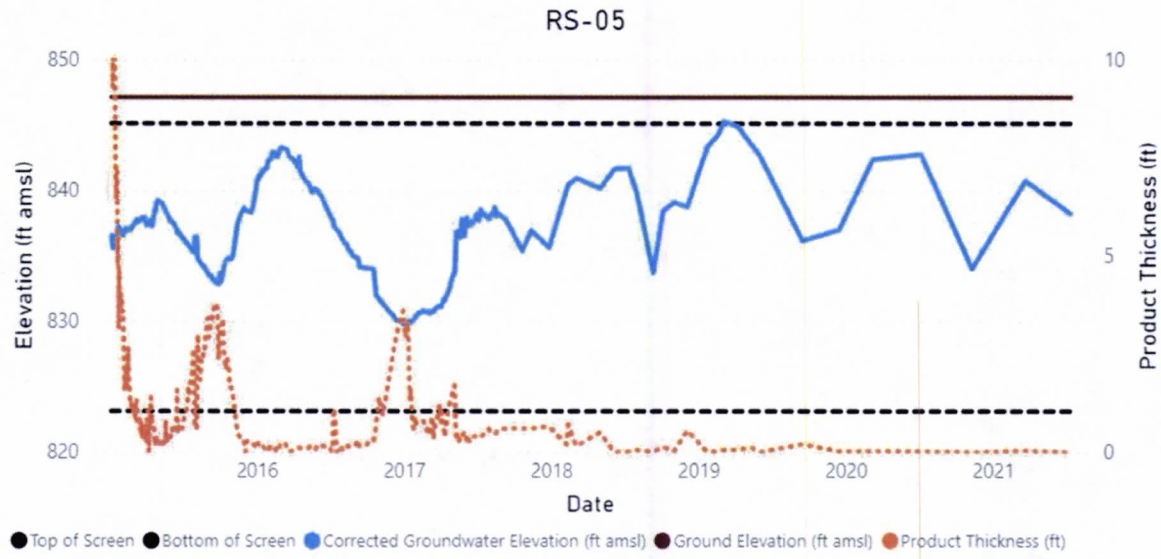
**Attachment A**  
**Product Thickness Trends**

Attachment A – Product Thickness Trends

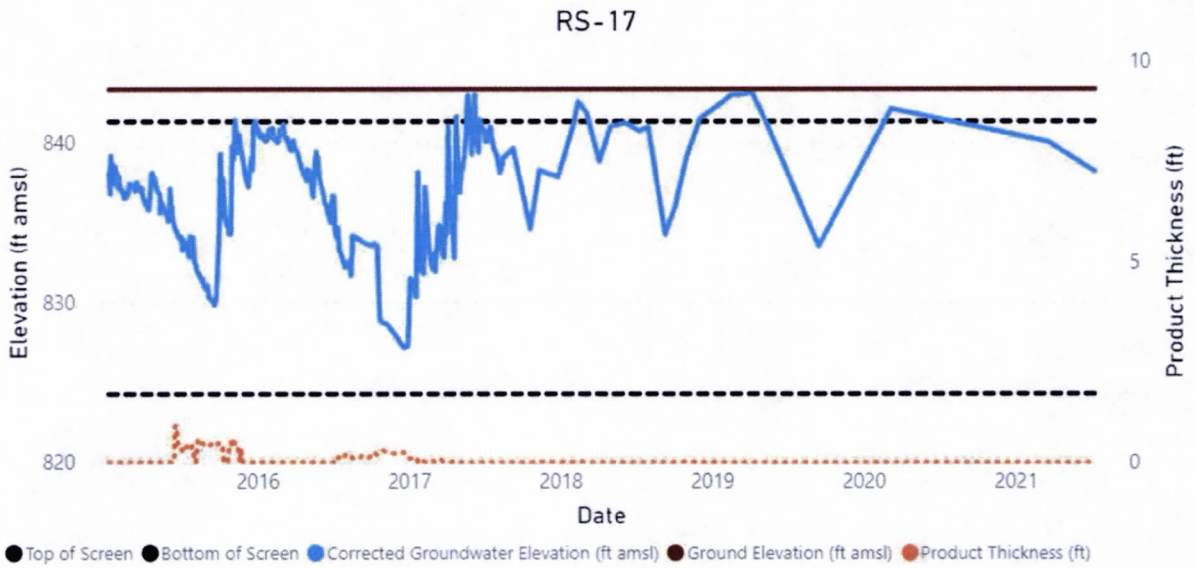
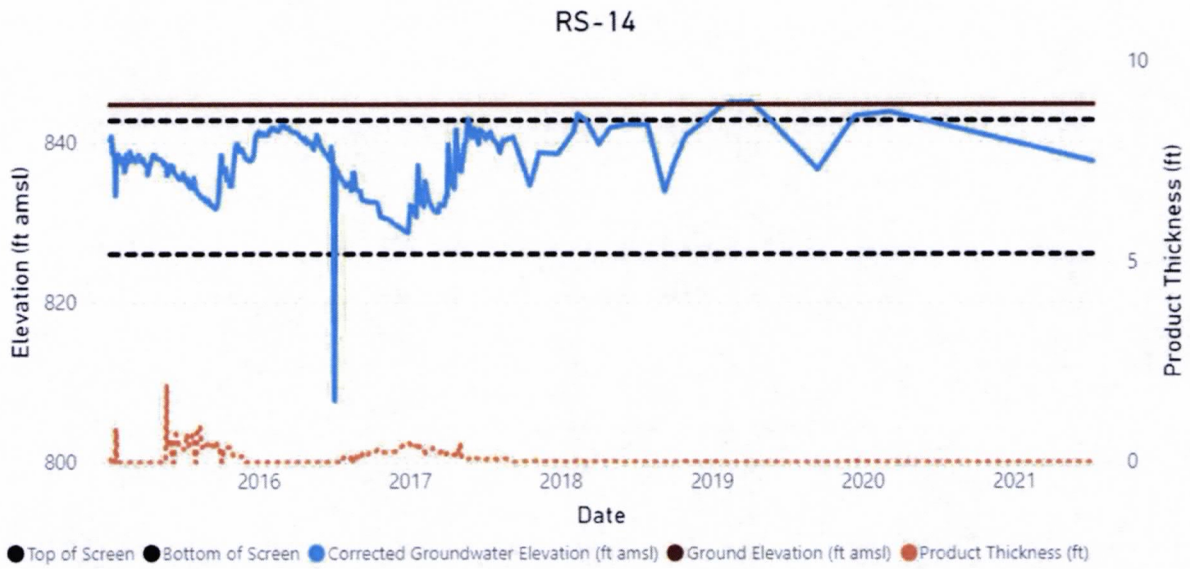




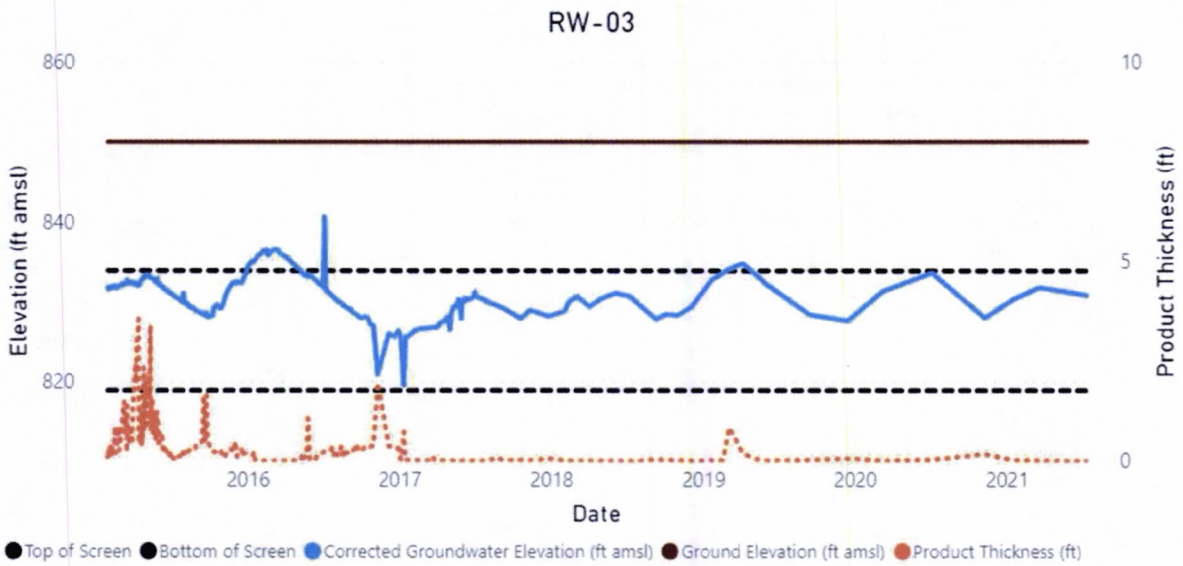
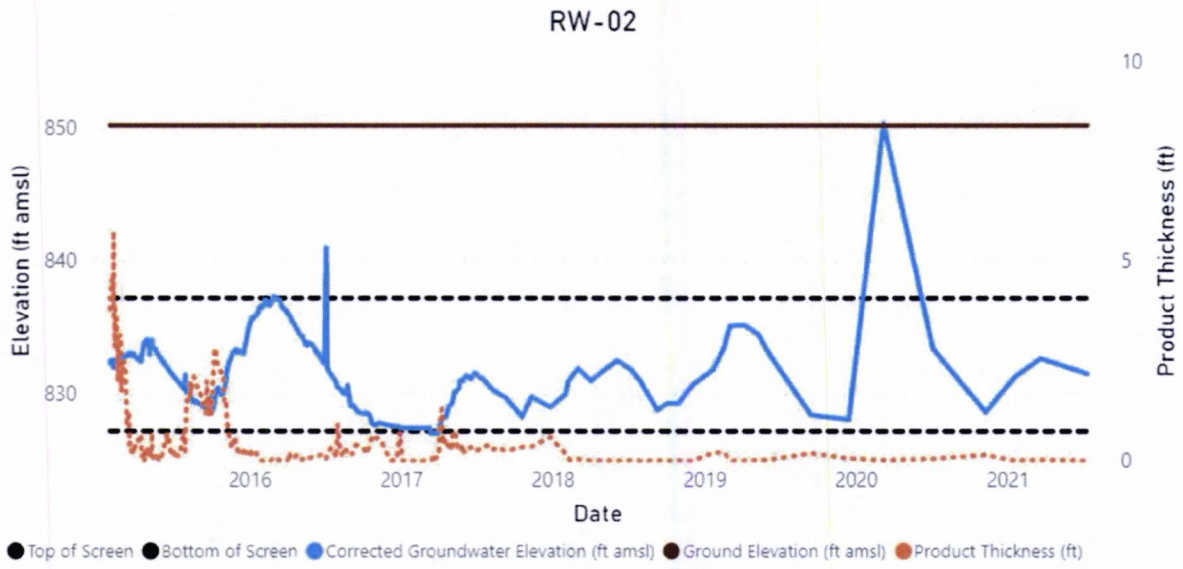
Attachment A – Product Thickness Trends



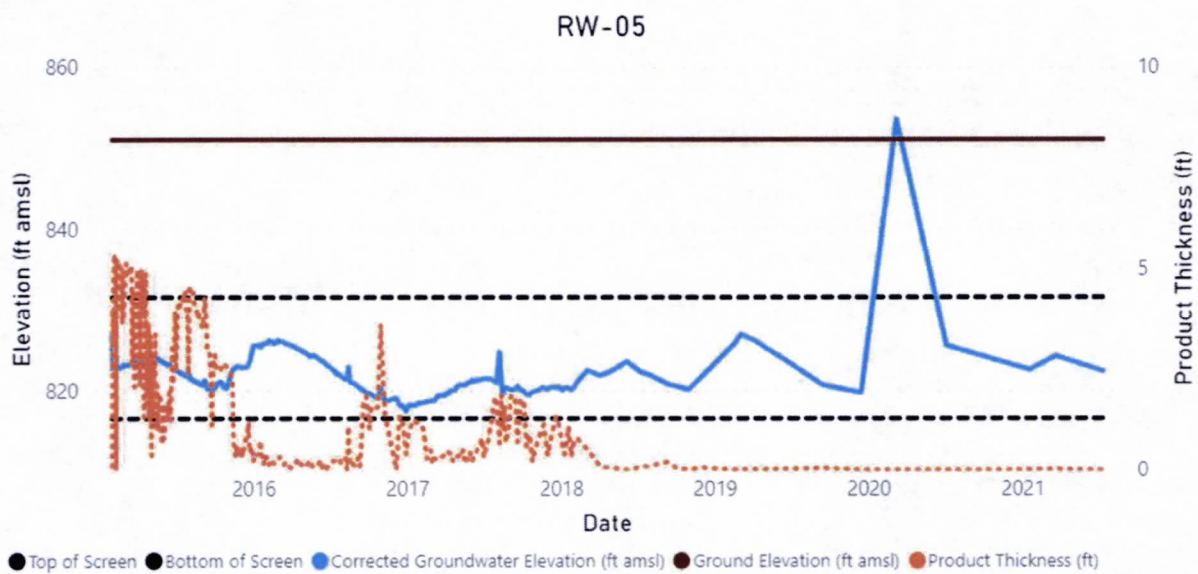
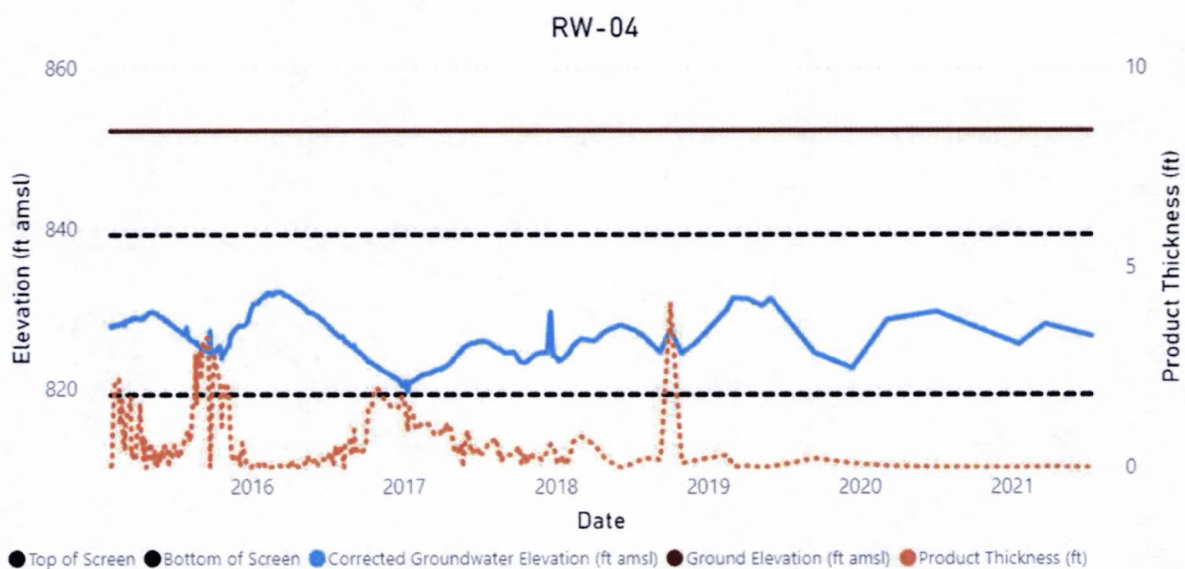
Attachment A – Product Thickness Trends



Attachment A – Product Thickness Trends

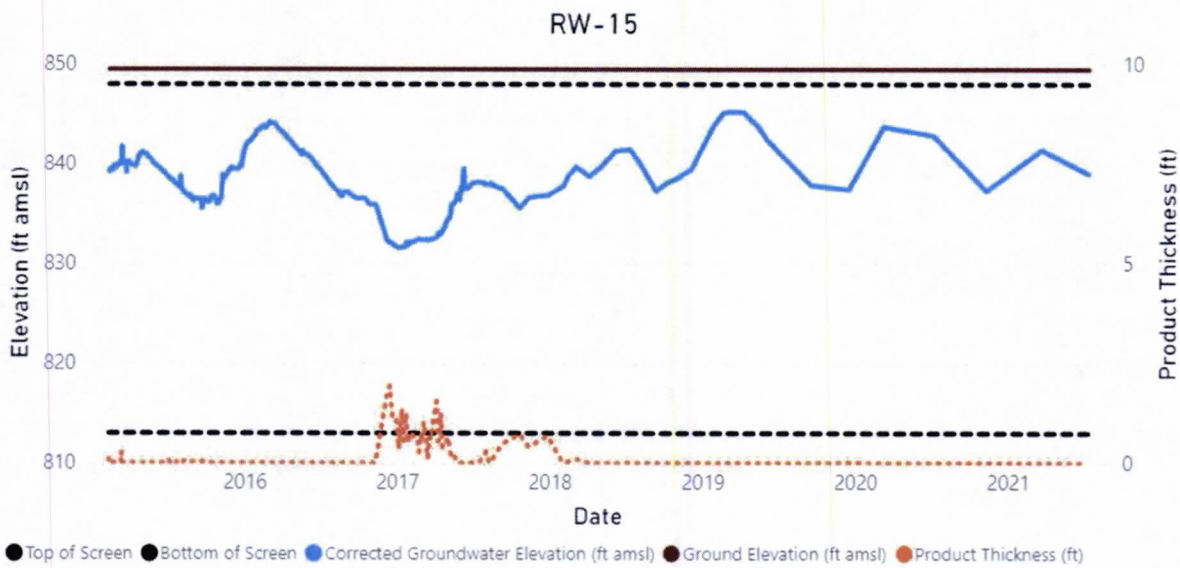
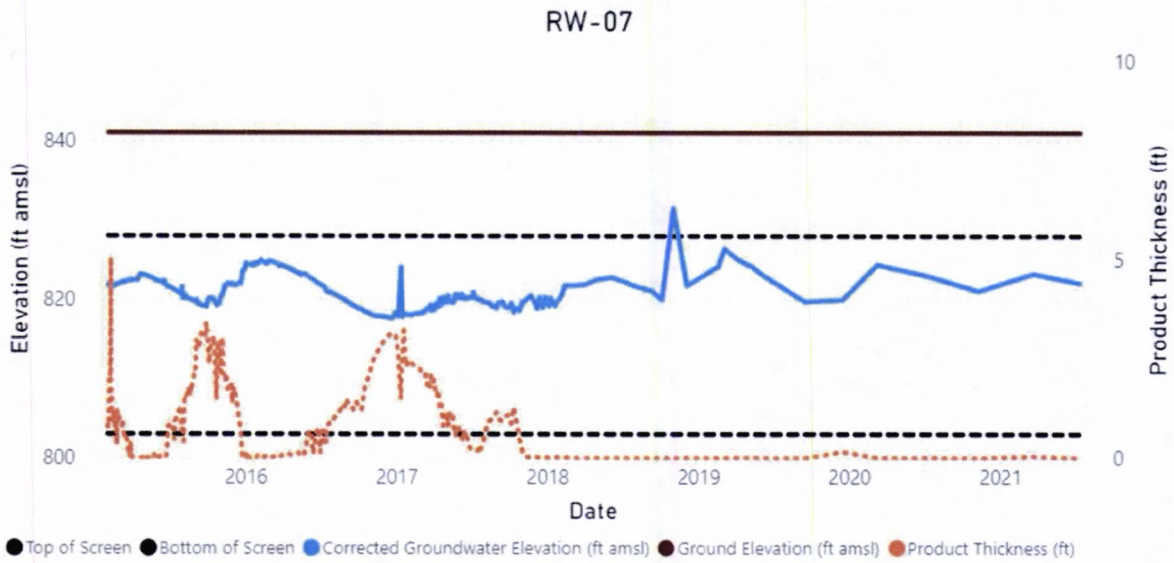


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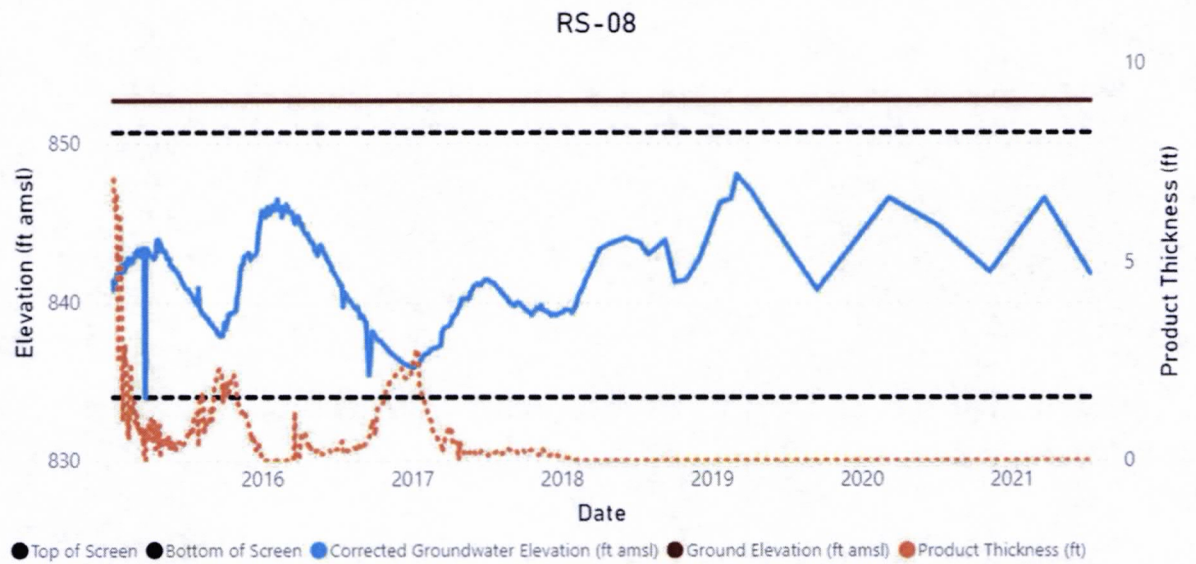
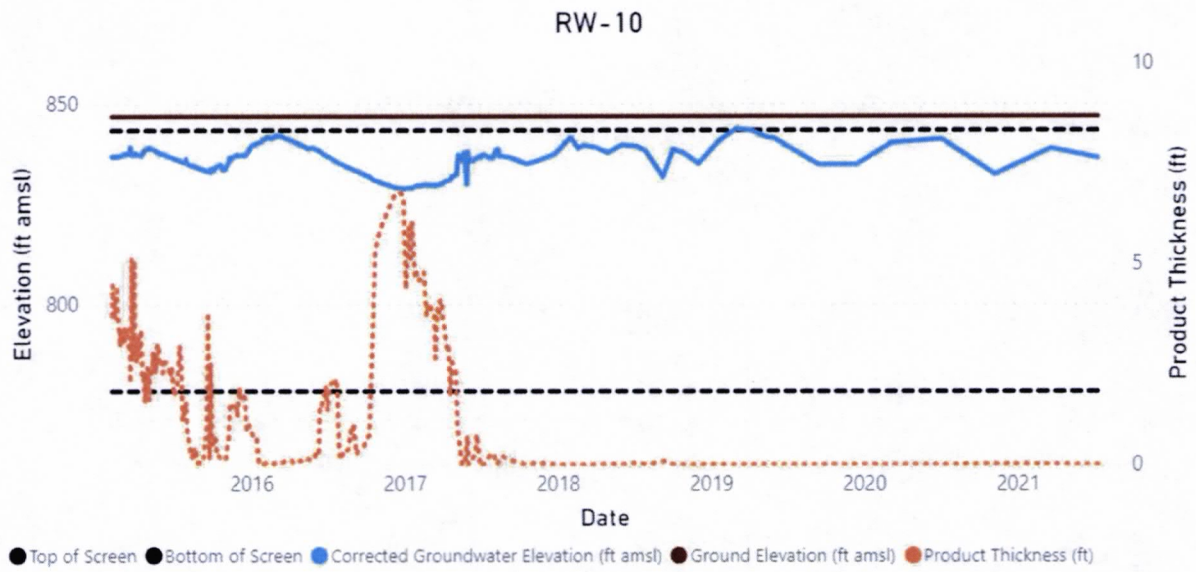




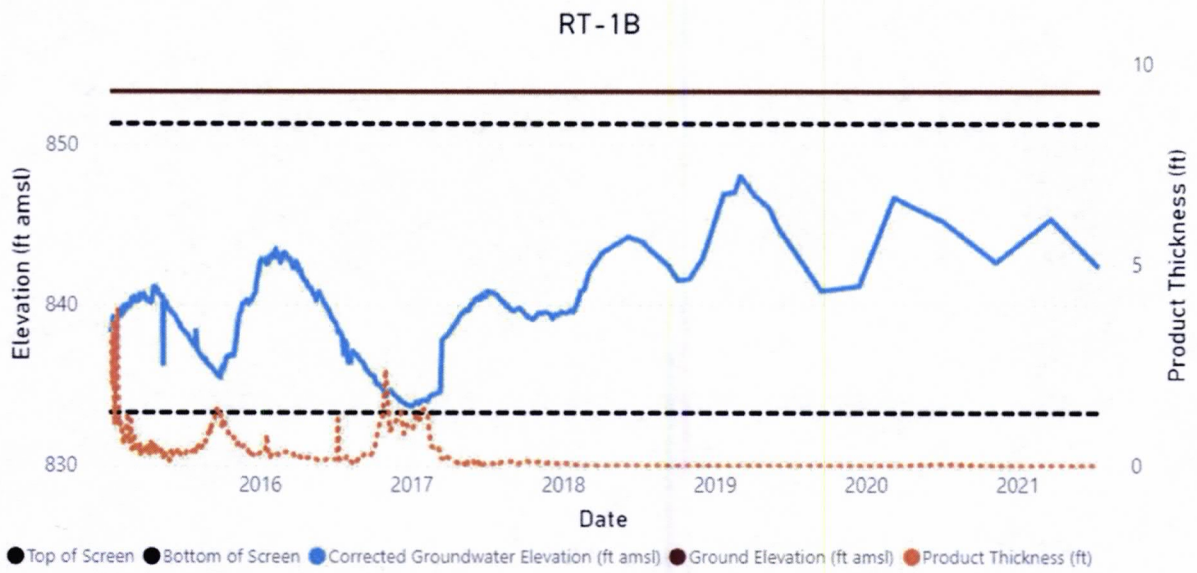
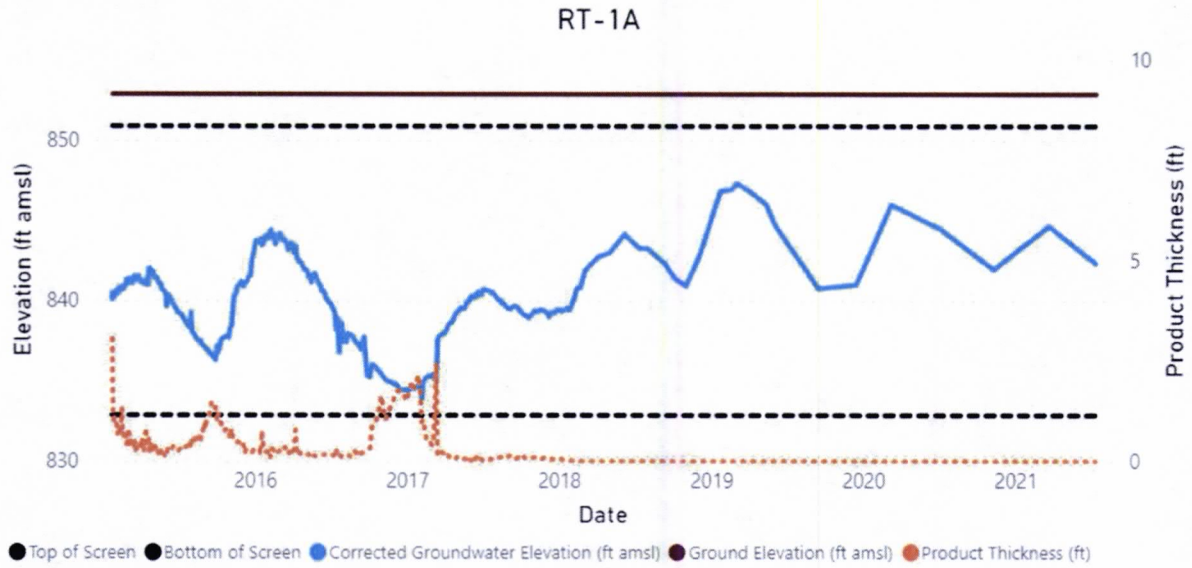
Attachment A – Product Thickness Trends



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