



May 2, 2024

*Delivery via Email and Trackable Overnight Delivery*

Ms. Caitlin Reilly  
South Carolina Department of Health and Environmental Control  
Assessment and Non-Permitted Petroleum Section  
UST Division  
2600 Bull Street  
Columbia, South Carolina 29201

**Subject: Corrective Action Plan Addendum #3  
Products (SE) Pipe Line Corporation  
Lewis Drive Remediation Site  
Belton, South Carolina  
Site ID #18693, "Kinder Morgan Belton Pipeline Release"**

Dear Ms. Reilly,

On behalf of Products (SE) Pipe Line Corporation (PPL), CH2M HILL Engineers, Inc. (Jacobs) has prepared this 3rd addendum to the Corrective Action Plan for the Lewis Drive Release Site dated September 1, 2016.

As presented during a meeting with the South Carolina Department of Health and Environmental Control (DHEC) on March 1, 2024, PPL plans to modify existing horizontal air sparge (HAS) well HAS-6 in the Cupboard Creek Protection Zone (**Figure 1**; CCPZ) to improve performance of the well.

Currently, HAS-6 is constructed as follows:

- 3-inch DR 11 high-density polyethylene (HDPE) pipe, 340 feet (ft) riser, 485 ft screen, depth ranges from 8-18 ft below ground surface (bgs)

Proposed modifications to result in:

- A 1-1/2" diameter conduit pipe will be sliplined inside the 3-inch DR 11 HDPE well, blocking off the first 250 ft of screen and directing compressed air flow to the distal end of the screen, within the most concentrated area of the petroleum plume in groundwater.

The modification will include trench box supported excavation to the depth of the HAS-6 well screen (estimated to be 10 ft) at the proposed manway location shown on **Figure 2**. Approximately 8 ft of screen will be removed and replaced with a new standpipe/access vault and extended stem valve, as shown on **Figure 3**. The excavation will be backfilled with bentonite, sand, and clean fill material (**Figure 3**), and any wastes generated during the modification will be characterized for disposal and managed by Jacobs with oversight by PPL.

# Jacobs

May 2, 2024

Subject: Corrective Action Plan Addendum #3

Design flow rates for the modified HAS-6 will range from 0.5-1.0 cubic feet per minute (cfm) screen (similar to Hayfield Zone horizontal well flow rates), using the existing air compressors and manifold system.

An air permit exemption request for the expanded system was approved by Kirk Schneider (DHEC) on May 20, 2021. A modification is not required for the encroachment permit for directional drilling under West Calhoun Road, received on June 30, 2021. An underground injection control permit (#SCHE03020469M4) for construction of the three HAS wells was received by PPL on April 22, 2021. Work will occur within the land disturbance limit as outlined in the Stormwater Pollution Prevention Plan (SWPPP), approved by the Anderson County Stormwater Department on May 17, 2021.

A work summary will be submitted to DHEC to determine if a modification to the current Underground Injection Control (UIC) permit will be required, and if necessary, Jacobs will submit the required documents prior to work beginning. The HAS-6 modification is expected to occur sometime in April/May 2024. DHEC will be notified at least two weeks in advance of excavation and modification activities. In addition, weekly documented erosion prevention and sediment control inspections will be performed during work activities in accordance with the SWPPP.

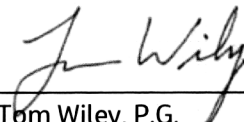
If you have any further questions or concerns, please contact me at 919-859-5789 or Mr. Greg Dempsey with PPL at 770-751-4143.

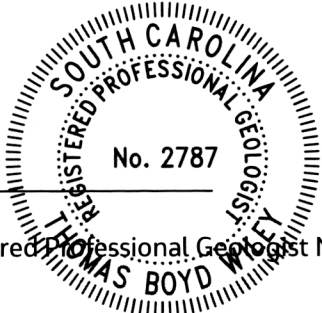
Regards,



**William M. Waldron**  
Program Manager

The material and data presented in this submittal were prepared consistent with current and accepted consulting principles and practices. This work was supervised by the following Jacobs licensed professional.

  
Tom Wiley, P.G.  
South Carolina Registered Professional Geologist No. 2787



May 2, 2024  
Date



May 2, 2024

Subject: Corrective Action Plan Addendum #3

Copies: Greg Dempsey, PPL (Digital, [greg\\_dempsey@kindermorgan.com](mailto:greg_dempsey@kindermorgan.com))  
Mary Clair Lyons, Esq., PPL (Digital, [Mary\\_Lyons@kindermorgan.com](mailto:Mary_Lyons@kindermorgan.com))  
Dustin Lay, PPL (Digital, [Dustin\\_Lay@kindermorgan.com](mailto:Dustin_Lay@kindermorgan.com))

Attachments:

Figure 1: Site Overview

Figure 2: HAS-6 Repair Option

Figure 3: HAS-6 Modification Detail

## Figures