

**East Goshen Township
Pipeline Task Force
Workshop Meeting Agenda
Thursday, January 17, 2019
5:00 PM**

Comment – Since the members of the Task Force deferred electing a Chair and Vice Chair, Supervisor Liaison David Shuey will facilitate the meeting in the interim.

1. Call to Order
2. Pledge of Allegiance
3. Moment of Silence
4. Ask if anyone is recording the meeting
5. Approval of Minutes
 - a. December 20, 2018
6. Chairman's Report
7. Reports
 - a. Legislative Update
Killion & Dinniman introduce Legislative Package
 - b. Current Pipeline Events Impacting East Goshen.
Sunoco is re-surveying North Chester Road and Boot Road in preparation for resumption of HDDs
Adelphia Environment Assessment – Comments due by February 4th
8. Old Business
 - a. Andover's exploration of inline pipe monitoring equipment
 - b. Consider recommendation for an additional valve
 - c. Consider recommendation regarding the IMP
 - d. Consider recommendation on confidential information
9. New Business
 - a. Review Adelphia Environmental Assessment
 - b. Review and compile task list from last meeting's discussion with Emergency Services and Emergency Management in EGT.
 - c. Consider Pipeline Coatings Request
10. Public Comment
11. Action Items
12. Adjournment

**EAST GOSHEN TOWNSHIP
PIPELINE TASK FORCE MEETING
1580 PAOLI PIKE
THURSDAY, DECEMBER 20, 2018
DRAFT MINUTES**

Present: Members: Judi DiFonzo, Caroline Hughes, Russ Frank, Karen Miller, Bill Wegemann; David Shuey, Liaison and Township Supervisor; Mike Lynch, Township Supervisor; Rick Smith, Township Manager; Frank Sullivan, Don Herb and Kevin Heym – Emergency Hazmat Unit; Bill Turner, Emergency Services; Kevin Miller, EGT Emergency Management Coordinator.

Call to Order & Pledge of Allegiance

David called the meeting to order at 5:03 p.m. and led the pledge of allegiance. David is serving as the facilitator of the Pipeline meetings until a chairperson/vice chairperson is elected.

Moment of Silence

David called for a moment of silence for firefighters and first responders.

Recording

No one was recording the meeting.

Approval of Minutes

Russ made a motion to approve the minutes of the November 27, 2018 meeting as amended. Bill seconded. The motion passed 5-0.

Chairman's Report

None.

New Business

a. **Presentation/Discussion regarding Pipelines**

David welcomed the various members from the Chester County Department of the Emergency Services. He explained that the Pipeline Taskforce is challenged with how to help residents and help Emergency Services (ES) in relation to pipeline safety. The Taskforce compiled a list of questions to address this.

Caroline asked what can be shared with us regarding about how ES would respond in case of a suspected pipeline leak scenario.

- Frank explained that the daily efforts of ES concentrate on public safety. If an emergency occurs, the calls are dispatched simultaneously to the police, fire department and County Hazmat Unit. In addition the pipeline company would be notified as well.

Caroline asked if ES has hydrocarbon gas detectors.

- 1 • Don explained the Hazmat Unit and the fire departments have a 4 gas
2 monitors. This equipment can detect: 1) flammability 2) oxygen 3) carbon
3 monoxide 4) hydrogen sulfide.

4
5 David questioned how often law enforcement personnel attend training? For
6 example; Do WEGO officers know not to drive into the fumes?

- 7
8 • Frank stated that back in May, approximately six law enforcement officers
9 attended the training and this is typical of all training sessions. He further
10 explained that when 911 receive an emergency call, there is communication
11 from the call center; the police, who are typically the first to arrive at the
12 scene, conduct a primary assessment and report back to the call center.

13
14 David questioned how ES communicates with the pipeline company during an
15 Emergency?

- 16 • Frank explained that when a call comes into 911, they notify the appropriate
17 pipeline communication center. The pipeline company will initially send a
18 field tech out who is familiar with the pipeline in this area and then send in
19 more senior personnel as needed.
20 • Don continued that the communication is face-to-face at the command level.
21 • Bill T. explained that the first priority in responding to an emergency is life
22 safety, not stopping the leak.

23
24 David stated that the Taskforce needs to be able to advise the community on
25 how to recognize a leak. In a past incident, a resident struggled to receive
26 answers in a timely matter because she did not contact 911. There is also
27 concern with Wellington due to the close proximity of the Sunoco pipeline. Can
28 the County provide assistance?

- 29 • Frank stated that a past tabletop exercise addressed and focused on a
30 potential leak north of Wellington. The County has a Design Team that will
31 work with the operator of a specific facility to develop an emergency
32 operations plan. Once the plan is developed, they will choose a scenario and
33 conduct a table top exercise to see if the plan is appropriate. These exercises
34 are then reviewed; strengths and weaknesses are noted and the plan is
35 modified as needed.

36
37 David questioned what residents and management at Wellington know about
38 evacuation vs shelter in place.

- 39 • Frank stated that Wellington is working with ES on their plan.

40
41 Mike questioned if East Goshen could have a tabletop exercise focusing on
42 Wellington?

- 43 • Don stated that the request should be sent to Bill T.
44 • Bill T. stated that there are planning steps that would need to complete first;
45 but it would only take a couple of months to conduct the tabletop exercise.
46

1 David question if County can help the Taskforce improve communications? E.g.
2 the need to inform parents to stay away if there is an incident at a school.

- 3 • Frank explained that the schools have Emergency Operations Plan that
4 address this issue and that they already are working with ES.

5
6 Bill W. asked how we educate the general public. E.g. do not use cell phone due
7 to the ignition hazard. Is the "ignition issue" included in the tabletop exercise?

- 8 • Frank explained that the recent tabletop included site evacuations and
9 hospital influx. Don explained that the tabletop exercise sponsor controls
10 what is covered in the exercise.

11
12 Bill W. stated Sunoco has completed their risk assessment. This is not given to
13 the public; but wanted to know if ES has it?

- 14 • Bill T. stated that the risk assessment is part of Sunoco's Integrity
15 Management Plan. ES has had an opportunity to review the risk assessment
16 which includes the modeling and distancing information for various types of
17 incidents.

18
19 Mike L. asked if ES obtain any insights or made any change to their protocol
20 based on this review.

- 21 • Bill T. stated that their review did not cause any changes to their emergency
22 plans. He continued that whenever a pipeline company provides information,
23 ES will in turn incorporate it into their plans as needed.
- 24 • Don added that pipelines are not new to the County. The ES staff has been
25 trained on what to do in the event of a pipeline emergency.

26
27 Caroline asked about how the evacuation process is conducted. Especially if the
28 leak is an NGL; ES personnel should not enter the area if there is a vapor cloud.

- 29 • Don stated that the ES response is no different for this type of situation. He
30 reiterated that life safety is always the top priority.
- 31 • Frank added that the air quality is monitored on the perimeter of the site and
32 that situational awareness starts at dispatch.

33
34 Caroline expressed concern that one cannot tell where the vapor clouds are and
35 ES personnel could potentially drive into the area and ignite the cloud. Cell
36 phones may also cause ignition.

- 37 • Frank explained that they have designated call zones: hot, warm & cold –
38 which is all documented in their ES guide book to which they refer.
 - 39 • Bill T. added that County gives the local fire department the call and relevant
40 information. How they address the situation and move forward is
41 determined by the incident commander on the scene.
 - 42 • Kevin H. noted and explained that the meters and radios ES carries are
43 "intrinsically safe". This means that they will not cause an ignition.
 - 44 • Bill T. noted that there is no documentation and/or scientific evidence that
45 support cell phones igniting a vapor cloud.
- 46

1 Bill W. asked that since methyl mercaptan will not be added to the NGL products
2 in the Sunoco pipelines, what advice can you give residents to identify a leak?

- 3 • Don explained that if trees, bushes and other vegetation are dead in an area,
4 this could indicate a leak. He continued that there are so many variables and
5 it is difficult to instruct the public to follow "steps 1, 2, 3, 4" etc. Each
6 situation is different.

7
8 David asked Kevin Miller if the EGT Emergency Plan includes the ES county plan
9 or is it different.

- 10 • Kevin M. explained that they do indeed use the county plan and also have
11 specific items for local situations. He also stated that each facility is required
12 to have its own all hazard plan which has been adapted to their specific
13 facility. He continued that Wellington needs an evacuation plan for its facility.
14 It does not matter why they need to evacuate, they just need a plan on how to
15 move out the residents in the event of an emergency.

16
17 Caroline stated that if an NGL leak occurs and does not ignite, the vapor cloud
18 will continue to grow quickly. How is an evacuation handled?

- 19 • Frank stated that health care facilities and schools must have plans in place
20 already. The initial decision on whether to shelter in place or move out is up
21 to leadership of the facility. This decision is then coordinated with the
22 incident commander.
23 • Frank stated that it is up to school leadership to have evacuation plan.
24 • Kevin M., who is also the Exton Fire Chief, explained that in West Whiteland a
25 representative from the fire company has met with the school leadership to
26 review this issue and establish a relationship.

27
28 Judi stated that schools may be prepared but asked if the schools are preparing
29 the parents? She suggested that parents need a checklist on what to do.

- 30 • Frank said that Dr. Scanlon and the WCASD have tried to educate parents by
31 holding meetings on pipeline emergencies.
32 • Mike suggested that Judi contact Dr. Scanlon suggesting this checklist.

33
34 Mike asked the ES staff what gas monitoring devices are available to
35 homeowners and also if larger industrial units are available.

- 36 • Don stated that for homes there is a methane only detector. Some
37 industries have installed meters at their fence line, but the monitoring is
38 limited to their property. The Downingtown School District is considering
39 purchasing an infrared camera to be placed at a pipeline valve site
40 adjacent to one of their school.

41
42 Bill W. asked where the Sunoco Pipeline Control Center is located.

- 43 • Frank stated the control center is in Houston, Texas and it monitors the
44 pipelines 24x7x365. If an incident is identified, the Control Center calls 911
45 who then dispatch the Chester County Hazmat Team, fire department and
46 police. Personnel from Sunoco will also be dispatched to the scene.

1 David asked if Sunoco has distinct and enhanced procedures for a High
2 Consequence Areas, such as East Goshen Township, versus low consequence
3 areas (rural PA).
4

- 5 • Bill T. stated he was not able to answer that question. He continued that the
6 Protected Critical Infrastructure Information Program (PCII) from Homeland
7 Security states that Sunoco could share their procedures but the challenge is
8 to get Sunoco to agree to share that information.
9

10 Caroline asked in case of a vapor cloud; who calculates and determines the entry
11 point into the area. Delayed detection vs early detection will determine how big
12 vapor cloud becomes.

- 13 • Don explained that due to the many variables, the units dispatched at the
14 time of the incident will make that call. It is a "game day decision."
15

16 Bill W. asked if ES has received the Emergency Response Plan from Sunoco.

- 17 • Bill T. stated that they have asked Sunoco for a copy of their Emergency
18 Response Plan but did not receive. They were told they need to go to the
19 Marcus Hook location and review it there. He continued that when ES asked
20 Enterprise for a copy of their Emergency Response Plan, they received it the
21 next day.
22

23 David Shuey asked the ES if there was anything they feel we didn't ask and that
24 we should.

- 25 • Frank stated that this open communication is very good. We could include all
26 parties next time, law enforcement, fire and ES. He continued that we need to
27 consistently ask residents to sign up for Ready Chesco and Smart 911. And
28 the Township could publish a section in newsletter on how to recognize a
29 leak and they can continue to promote the 811 procedure (Pa One Call), since
30 many leaks are caused by improper digging.
31

32 David extended an open invitation to ES and for them to ask us whenever they
33 have anything we can do to help residents or help them.
34

35 The Task Force thanked Frank, Kevin H. Don, Bill T. and Kevin M. for their efforts
36 keeping East Goshen residents safe.
37

38 **Select Regular Meeting Dates:**

39
40 It was agreed that the next meeting will be January 24. It will be advertised that
41 the regular taskforce meetings will be the 4th Thursday of the month and
42 workshops on the 3rd Thursday as needed. Rick invited all to the January 12
43 annual planning meeting at 8:00.
44

45 **Old Business**

46

1 David suggested that given the time the Task Force would defer the other items
2 on the agenda to the next meeting and asked if the Task Force members had any
3 other comments or questions.

4
5 Bill W. asked Rick on the status of the Bow Tree/Matlack HDD. Rick stated that
6 Sunoco has received approval from PA DEP to re-start but has not started
7 working yet.

8
9 Bill W. stated that the Listen and Learn with Dr. Steinbraber on December 11
10 went well. Dr. Steinbraber answered questions until 10 pm. East Goshen's
11 pipeline efforts are gaining national exposure on her social media pages.

12
13 Caroline gave an update on the petition filed by six other residents and herself
14 that was the subject of a hearing on 11/29 & 11/30. The Emergency Petition was
15 denied. The hearing on the Complaint will be held at a later date.

16
17 Caroline stated that Sunoco tried to utilize the PUC letter that was sent to school
18 district superintends stating the ME1 pipe was safe. The PUC Bureau of
19 Investigation and Enforcement has filed a formal complaint against Sunoco as a
20 result of the Morgantown leak.

21
22 Caroline also reported that in the last 2 weeks alone, 6 workers were injured and
23 one was killed while working on the Sunoco Mariner project.

24
25 **Action Items and Items for next meeting**

- 26 a. Rick will send Bill W. copy of the email he sent to FERC about the Adelphia
27 project.
28 b. David stated that the Task Force needs to compile what we have learned and
29 devise a plan.
30 c. Consider recommendation for an addition valve
31 d. Consider recommendation regarding the IMP.
32 e. Consider recommendation on confidential information.

33
34 **Public Comment**

35 No public comment.

36
37 **Adjournment**

38 There being no further business, the meeting was adjourned at 7:25 pm.

39
40 The next meeting is Thursday, January 17, 2019 at 5:00 pm.

41
42 Respectfully submitted,

43
44 *Susan D'Amore*

« Killion Report – Neumann

University

Killion, Dinniman Introduce Comprehensive Pipeline Legislative Package

Posted on Jan 02, 2019

WEST CHESTER (January 2, 2019) – State Senators Tom Killion and Andy Dinniman announced today that they have introduced a comprehensive legislative package aimed at reforming Pennsylvania’s pipeline regulatory process to improve safety at schools and in local neighborhoods and communities.

“For years, I’ve been working to protect our communities from the potential safety risks of the Mariner East pipeline project. Along the way, I’ve identified several areas that are in dire need of improvement in the Commonwealth,” Dinniman said. “These bills are a result of that ongoing effort and a necessary starting point to refocus and reenergize our efforts in the new year. I am committed to working in the spirit of bipartisanship and for the sake of Chester County residents and families to achieve real and lasting pipeline safety reform in the 2019-2020 legislative session.”

“Pipelines are transporting highly flammable and toxic materials under high pressure through densely populated areas. Having new laws in place to ensure the safety of families living in pipeline communities is long overdue,” Killion said. “I look forward to working with Senator Dinniman on passing these bills. Pipeline industry oversight and public safety are top concerns for our constituents, and I’m pleased to be partnering with him on these important issues.”

The bipartisan package consists of 12 bills, six sponsored by Dinniman and six sponsored by Killion. Both senators also serve as first prime co-sponsor of each other’s bills. They are as follows:

- **Pipelines Located Near Schools** (Dinniman) – Outlines types of information that pipeline operators must share with schools that fall within 1,000 ft of hazardous liquids and natural gas pipelines, including how to respond to a leak. Currently, pipeline operators are not required to provide this information. This bill was previously **Senate Bill 1257 of 2018**.
- **Pipeline Siting Review** (Dinniman) – Requires pipeline companies to submit a detailed application to the Pennsylvania Public Utility Commission (PUC) prior to construction of a new pipeline. It also requires approval from the Pennsylvania Department of Environmental Protection (DEP), the local governing body of a county and the local emergency management organization coordinators in evaluating each metric, and at least two public hearings in each county where the construction would take place. This bill was previously **Senate Bill 928 of 2017**.
- **Pipeline Emergency Response Fund** (Dinniman) – Authorizes counties to enact an ordinance to impose a fee on all covered pipelines in the county. If the county does not enact an ordinance, each municipality in the county is authorized to impose the fee on the pipelines in the county. The funding is distributed only to those counties or municipalities based on the total distance of pipelines in each county or municipality. This bill was previously **Senate Bill 929 of 2017**.
- **Pipeline Emergency Notification** (Dinniman) – Requires public utility facilities transporting natural gas or natural gas liquids to meet with the county emergency coordinator entrusted to respond in the event of natural gas release and provide vital emergency response and evacuation information. This bill was previously **Senate Bill 930 of 2017**.
- **Pipeline Safety Valves** (Dinniman) – Calls for incorporating automatic or remote shutoff valves on pipelines that impact high consequence areas throughout Pennsylvania. This bill was previously **Senate Bill 931 of 2017**.
- **Regulation of Land Agents** (Dinniman) – Holds pipeline land agents accountable by defining their role and requiring registration with the Pennsylvania Real Estate Commission. In addition, the bill calls for allowing public access to a listing of registered agents, requiring criminal history background checks, and providing the commission with the authority to revoke or suspend them for reasons such as fraud or misrepresentation.

This bill was previously **Senate Bill 835 of 2017**.

- **Pipeline Safety Inspection** (Killion) – Centralizes pipeline safety inspection within the Pennsylvania Department of Transportation (PennDOT) and requires PennDOT to apply to the federal government for designation as an Interstate Agent in the inspection of interstate pipelines traversing Pennsylvania. This bill is similar to **Senate Bill 604 of 2017**.
- **Pipeline Impact Fee** (Killion) – Establishes a pipeline impact fee calculated based on the acreage of linear feet plus right-of-way width of a pipeline using the county average land value in an affected area. The funds would be collected by the PUC and deposited into a Pipeline Impact Fund where they would be distributed to the counties and municipalities impacted. This bill is similar to **Senate Bill 605 of 2017**.
- **Pipeline Safety – Notification Requirements** (Killion) – Requires pipeline companies to provide notification to residents, municipalities and other applicable parties affected by drilling at least five days in advance of the initiation of any project. This bill is similar to **Senate Bill 1027 of 2018**.
- **Pipeline Safety – Mandatory Study Requirement** (Killion) – Requires pipeline operators to conduct proper studies and hydrological investigations of aquifers that may be potentially impacted by pipeline construction. This bill is similar to **Senate Bill 1028 of 2018**.
- **Pipeline Safety and Advanced Leak Detection** (Killion) – Requires Pennsylvania and the DEP to develop clear permit conditions and siting guidelines to increase the focus on pipeline safety and pipeline infrastructure siting to reduce the dangers of improper siting, improper safety management and wasted resources.
- **Establishing a Commission to Study Pipeline Construction and Operations** (Killion) – Establishes a special bipartisan legislative commission to recommend safety, oversight and interagency coordination improvements for the transport of oil, natural gas and other hazardous liquids through pipelines in this Commonwealth. This legislation is similar to **Senate Resolution 373 of 2018**.

Memo

East Goshen Township

Voice (610) 692-7171

E-mail rsmith@eastgoshen.org

Date: January 10, 2019

To: Pipeline Task Force

From: Rick Smith, Township Manager

Re: Adelphia Gateway

There are three issues that the Task Force needs to consider with regards to Adelphia Gateway.

1. Comments on the Environmental Assessment

SEE #1 and #3

On January 4th FERC issued its Environmental Assessment for the Adelphia Gateway Project and comments need to be submitted to FERC on or before February 3, 2019.

We have posted a link to the Environmental Assessment on our web page. Attached are my comments on the Environmental Assessment.

2. Request for an Environmental Impact Statement.

At the December 4th Supervisors meeting a resident suggested that the Board petition FERC to ask that Adelphia be required to prepare an Environmental Impact Statement as opposed to the Environmental Assessment.

There is a difference as noted in the excerpts below which are from the glossary on the FERC website (**Emphasis added**).

Environmental Assessment

*An Environmental Assessment (EA) evaluates the consequences of a proposed action on the environment and recommends measures to minimize any potentially adverse affects. An EA is prepared when the environmental scoping process has determined that the project **would not significantly affect the quality of the human environment.***

Environmental Impact Statement

*The statement required of federal agencies by Section 102 (C) of the National Environmental Policy Act of 1969, for major Federal actions that **may significantly affect the quality of the human environment.***

Our solicitor advised that since FERC has directed Adelphia to file an Environmental Assessment, simply filing a petition asking FERC to have Adelphia prepare an Environmental Impact Statement would not be successful.

She suggested that once the Environmental Assessment was released: that we review it with a fine tooth comb to identify those issues that "may significantly affect the quality of the human environment". We could then file a petition citing those issues.

Accordingly I would suggest that you keep the above in mind as you review the Environmental Assessment, and specifically note those items that would support a petition for an Environmental Impact Statement.

3. Paoli Pike Valve

SEE #2

At the January 7th Supervisors meeting a resident expressed a concern about the work Adelphia needs to perform on the Paoli Pike Valve.

The Paoli Pike Valve which is located in a wetland will need to be upgraded as part of the project. Adelphia will need a permit for this work, and FERC has requested Adelphia to identify alternatives. Adelphia identified three other locations for the valve, all of which are closer to residents. And even if they relocate the valve, they would still have to work in the wetland to remove the existing valve.

See attached.

Cc: Board of Supervisors

#1

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Adelphia Gateway, LLC

Docket Nos. CP18-46-000
CP18-46-001

**NOTICE OF AVAILABILITY OF THE
ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED
ADELPHIA GATEWAY PROJECT**

(January 4, 2019)

The staff of the Federal Energy Regulatory Commission (FERC or Commission) has prepared an environmental assessment (EA) for the Adelphia Gateway Project proposed by Adelphia Gateway, LLC (Adelphia) in the above-referenced docket. Adelphia requests authorization to purchase, construct, and operate natural gas transportation facilities (including compression) in Northampton, Bucks, Montgomery, Chester, and Delaware Counties, Pennsylvania, and New Castle County, Delaware.

The EA assesses the potential environmental effects of the construction and operation of the Adelphia Gateway Project in accordance with the requirements of the National Environmental Policy Act (NEPA). The FERC staff concludes that approval of the proposed project, with appropriate mitigating measures, would not constitute a major federal action significantly affecting the quality of the human environment.

The U.S. Environmental Protection Agency and U.S. Department of Transportation – Pipeline and Hazardous Materials Safety Administration participated as cooperating agencies in the preparation of the EA. Cooperating agencies have jurisdiction by law or special expertise with respect to resources potentially affected by the proposal and participate in the NEPA analysis.

The proposed Adelphia Gateway Project includes the following new facilities:

- two 16-inch-diameter laterals (Parkway [0.3 mile] and Tilghman [4.4 miles]);
- two 5,625 horsepower compressor stations (Marcus Hook and Quakertown);
- five meter stations (Quakertown, Delmarva, Monroe, Transcontinental Gas Pipeline Company, and Tilghman);

- seven blowdown assembly valves (Chester Creek, Paoli Pike, French Creek, Cromby, Schuylkill River, Perkiomen Creek, and East Perkiomen Creek);
- two mainline valves;
- two tap valves (Quakertown and Skippack); and.
- four pig launchers and two pig receivers.¹

Adelphia would also purchase an existing system currently owned and operated by Interstate Energy Company, LLC, including:

- 84.2 miles of existing 18-inch-diameter pipeline (the northern 34.8-mile segment was designed to transport oil or natural gas but has been transporting natural gas exclusively since 2014, and the southern 49.4-mile segment was previously used to transport fuel oil);
- 4.4 miles of existing 20-inch-diameter pipeline (which currently transports natural gas); and
- four existing meter and regulator stations along the existing mainline.

The Commission mailed a copy of the *Notice of Availability* to federal, state, and local government representatives and agencies; elected officials; environmental and public interest groups; Native American tribes; potentially affected landowners and other interested individuals and groups; and libraries in the project area. The EA is only available in electronic format. It may be viewed and downloaded from the FERC's website (www.ferc.gov), on the Environmental Documents page (<https://www.ferc.gov/industries/gas/enviro/eis.asp>). In addition, the EA may be accessed by using the eLibrary link on the FERC's website. Click on the eLibrary link (<https://www.ferc.gov/docs-filing/elibrary.asp>), click on General Search, and enter the docket number in the "Docket Number" field, excluding the last three digits (i.e., CP18-46). Be sure you have selected an appropriate date range. For assistance, please contact FERC Online Support at FercOnlineSupport@ferc.gov or toll free at (866) 208-3676, or for TTY, contact (202) 502-8659.

¹ A pipeline "pig" is a device to clean or inspect the pipeline. A pig launcher/receiver is an aboveground facility where pigs are inserted or retrieved from the pipeline.

Any person wishing to comment on the EA may do so. Your comments should focus on the EA's disclosure and discussion of potential environmental effects, reasonable alternatives, and measures to avoid or lessen environmental impacts. The more specific your comments, the more useful they will be. To ensure that the Commission has the opportunity to consider your comments prior to making its decision on the project, it is important that we receive your comments in Washington, DC **on or before 5:00pm Eastern Time on February 3, 2019.**

For your convenience, there are three methods you can use to file your comments to the Commission. The Commission encourages electronic filing of comments and has staff available to assist you at (866) 208-3676 or FercOnlineSupport@ferc.gov. Please carefully follow these instructions so that your comments are properly recorded.

- (1) You can file your comments electronically using the [eComment](#) feature on the Commission's website (www.ferc.gov) under the link to [Documents and Filings](#). This is an easy method for submitting brief, text-only comments on a project;
- (2) You can also file your comments electronically using the [eFiling](#) feature on the Commission's website (www.ferc.gov) under the link to [Documents and Filings](#). With eFiling, you can provide comments in a variety of formats by attaching them as a file with your submission. New eFiling users must first create an account by clicking on "[eRegister](#)." You must select the type of filing you are making. If you are filing a comment on a particular project, please select "Comment on a Filing"; or
- (3) You can file a paper copy of your comments by mailing them to the following address. Be sure to reference the project docket number (CP18-46-000 and/or CP18-46-001) with your submission: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Room 1A, Washington, DC 20426.

Any person seeking to become a party to the proceeding must file a motion to intervene pursuant to Rule 214 of the Commission's Rules of Practice and Procedures (18 CFR 385.214). Motions to intervene are more fully described at <http://www.ferc.gov/resources/guides/how-to/intervene.asp>. Only intervenors have the right to seek rehearing or judicial review of the Commission's decision. The Commission may grant affected landowners and others with environmental concerns intervenor status upon showing good cause by stating that they have a clear and direct interest in this proceeding which no other party can adequately represent. **Simply filing**

Docket Nos. CP18-46-000 and
CP18-46-001

- 4 -

environmental comments will not give you intervenor status, but you do not need intervenor status to have your comments considered.

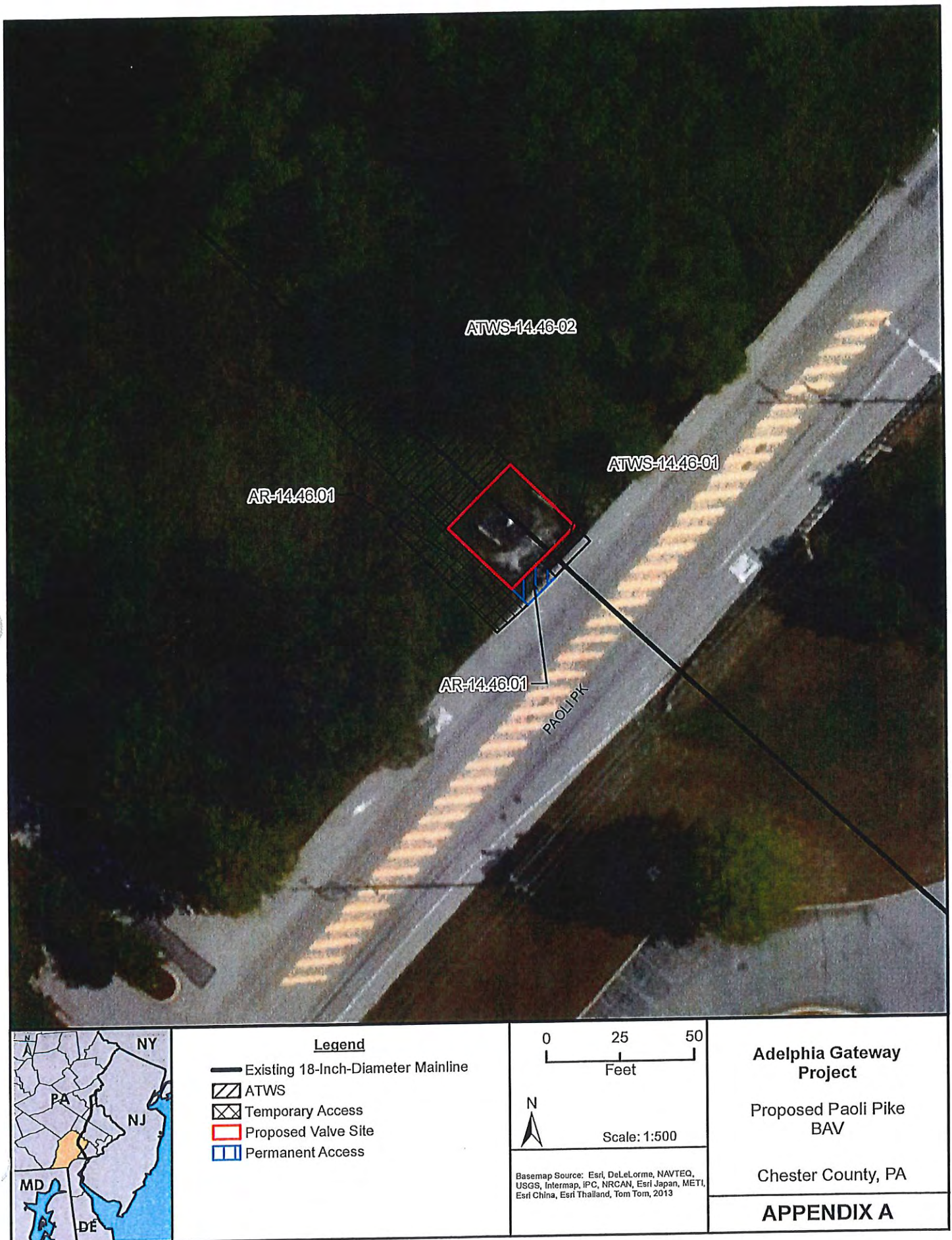
Additional information about the project is available from the Commission's Office of External Affairs, at **(866) 208-FERC**, or on the FERC website (www.ferc.gov) using the [eLibrary](#) link. The eLibrary link also provides access to the texts of all formal documents issued by the Commission, such as orders, notices, and rulemakings.

In addition, the Commission offers a free service called eSubscription which allows you to keep track of all formal issuances and submittals in specific dockets. This can reduce the amount of time you spend researching proceedings by automatically providing you with notification of these filings, document summaries, and direct links to the documents. Go to www.ferc.gov/docs-filing/esubscription.asp.

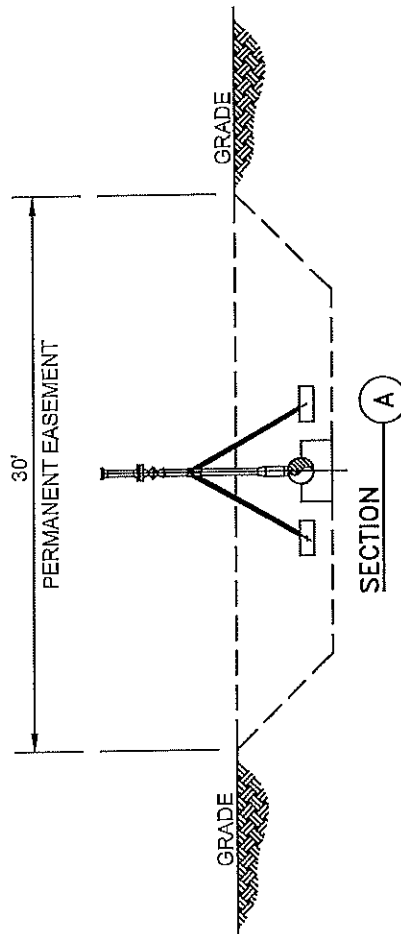
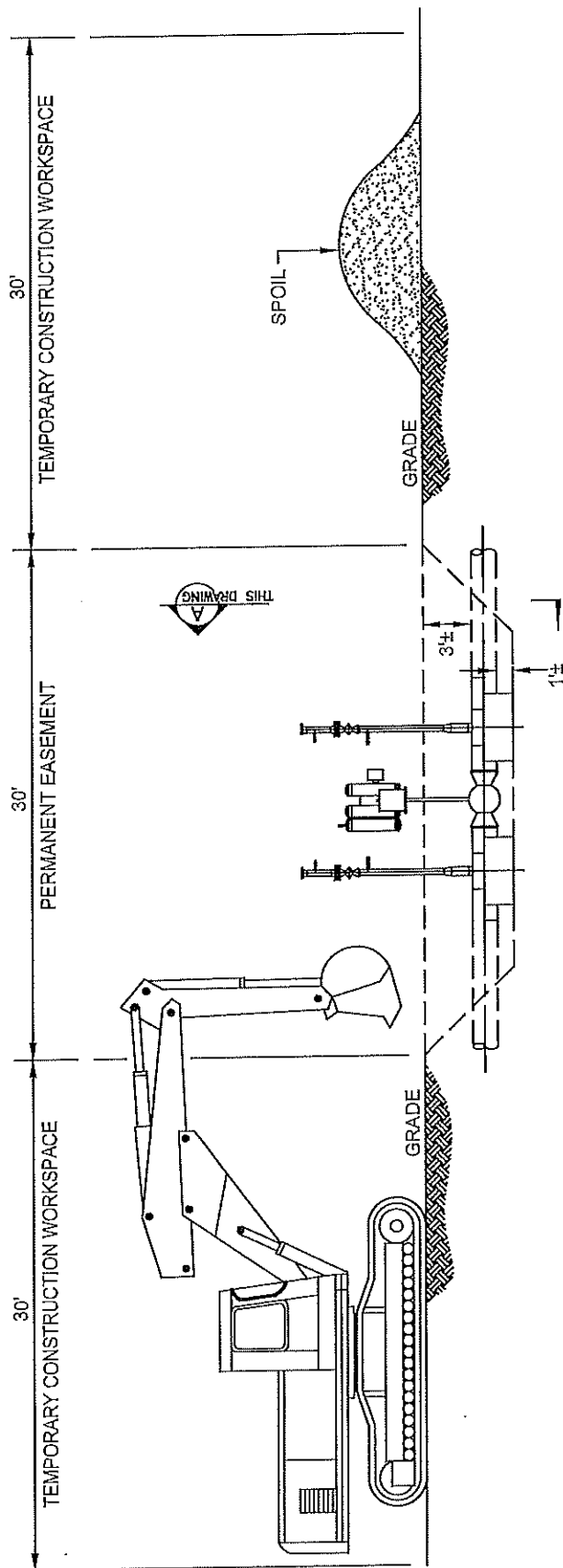
Nathaniel J. Davis, Sr.,
Deputy Secretary.

2

PAOLI PIKE VALVE



D



PUBLIC

RE-ISSUED FOR
FERC SUBMITTAL
08/20/2018

HGA
HUNT, GUILLOT & ASSOCIATES, LLC
ONE METROPLEX DRIVE, SUITE 100
BIRMINGHAM, AL 35209
PHONE 205-370-4877
FAX # 205-370-4866

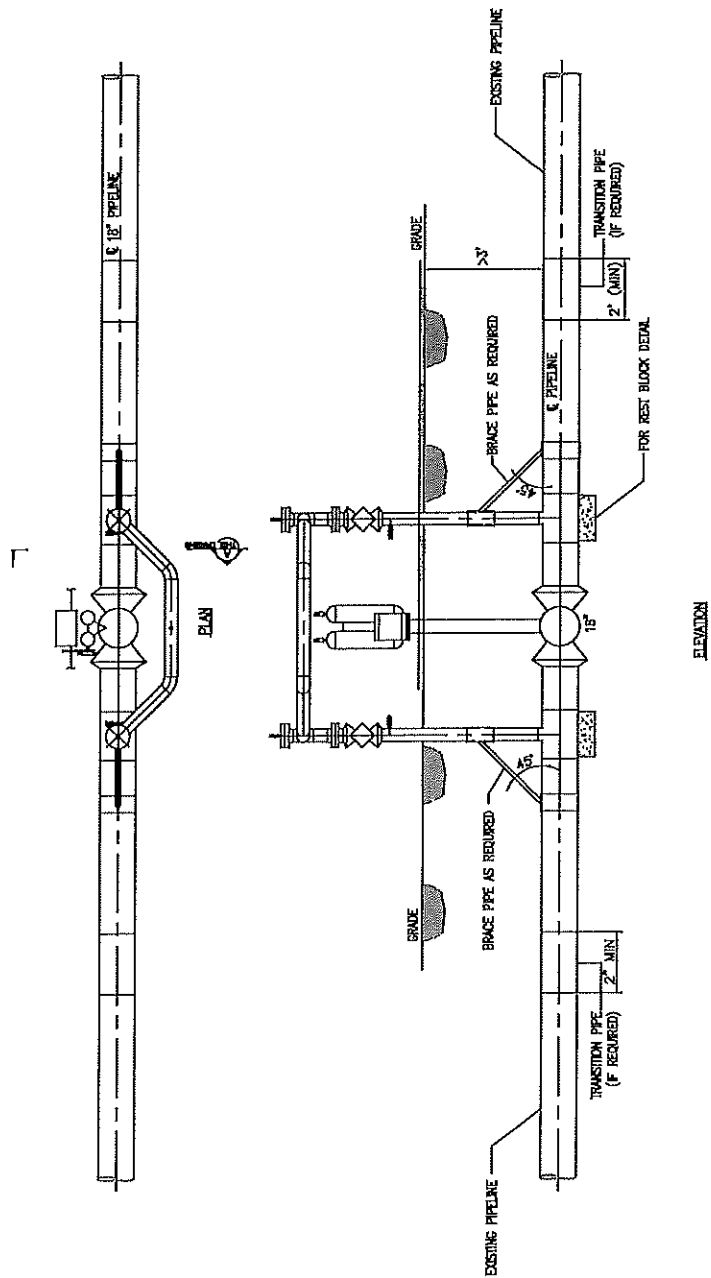
ADELPHIA GATEWAY, LLC
TYPICAL ROW CROSS SECTION
MLV BLOWDOWN ASSEMBLIES



REV	DESCRIPTION	CHK	DATE	APP	DATE	MODEL ID	PLT SCALE	HGA JOB NO.	APPROVED BY	CHECKED BY	DESIGNED BY	PLH	12/15/17
3	RE-ISSUED FOR FERC					6-A17022	1:1	6-A17022	ROH	MEH	MEH	PLH	12/15/17
2	NOT USED								08/20/2018				12/21/17
1	NOT USED												12/21/17
0	NOT USED												12/21/17


TYPICAL CONSTRUCTION RIGHT-OF-WAY
STANDARD WORK CORRIDOR

SCALE	DRAWING NUMBER	REV
N.T.S.	RR01-FIGURE 1-25	3



**RE-ISSUED FOR
FERC SUBMITTAL
08/20/2018**

SECTION
A-A



HUNT, GUILLOT & ASSOCIATES, LLC
ONE METROPOLIS DRIVE, SUITE 100
BIRMINGHAM, AL 35209
PHONE: 205-570-4977
FIRM # PA 4004148

ADELPHIA GATEWAY, LLC
TYPICAL
18" MAINLINE VALVE

SCALE
N.T.S.

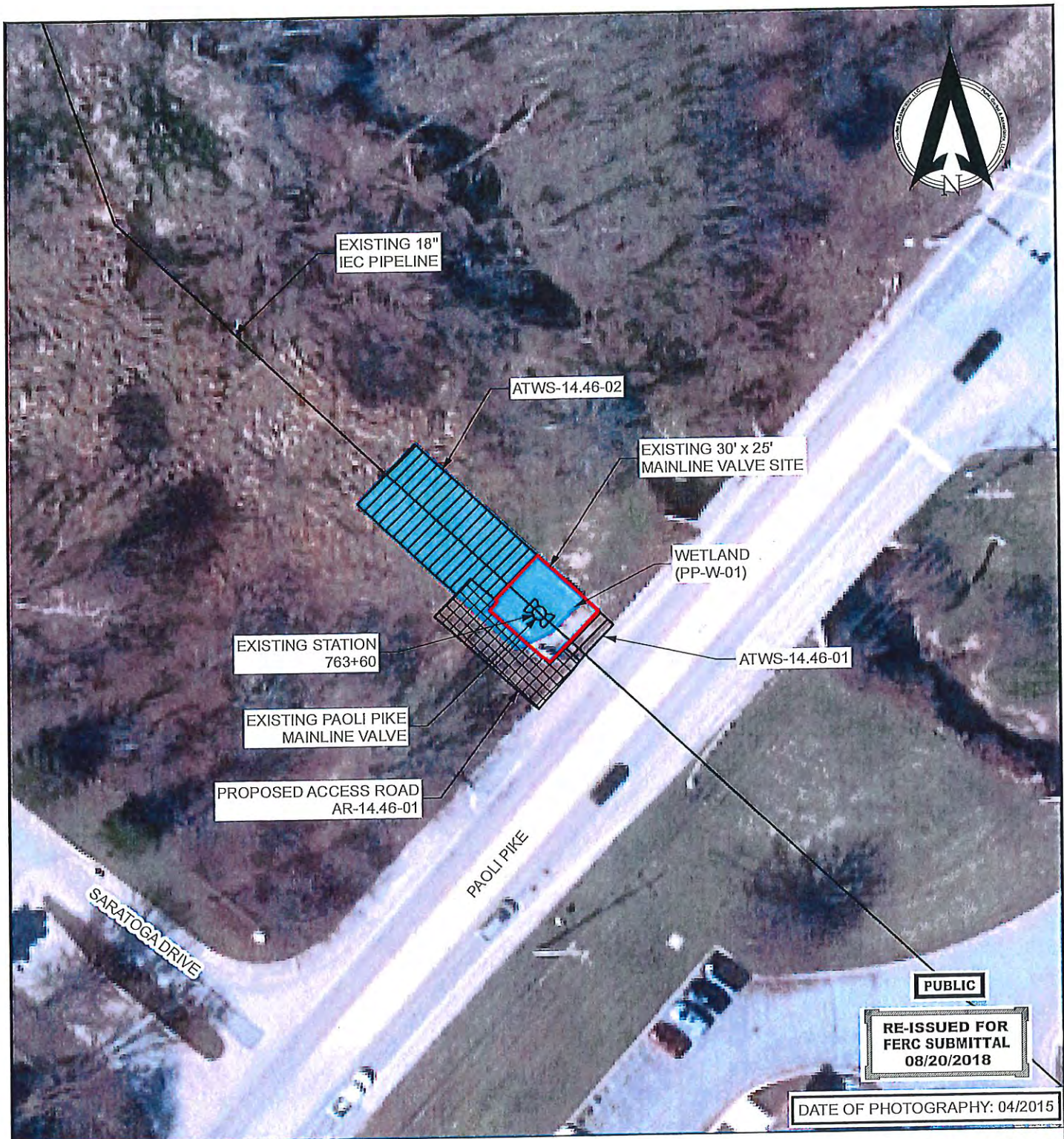
DRAWING NUMBER
8.A17022-TTP-02-01

REV
3

REV	DESCRIPTION	CHK	DATE	APP	DATE	MODEL ID	FLAT SCALE	HGA JOB NO.	APPROVED BY	CHECKED BY	DESIGNED BY	DRAWN BY	12/21/17	12/21/17	12/21/17
3	RE-ISSUED FOR FERC	MEH	08/20/18	RCH	08/20/18	RCH	1:1	8.A17022	RCH	MEH	GLP	GLP	12/21/17	12/21/17	12/21/17
2	NOT USED														
1	NOT USED														
0	ISSUED FOR FERC	MEH	12/29/17	RCH	12/29/17	8.A17022									



2018 1002-5167



LEGEND

- EXISTING SURFACE SITE
- EXISTING PIPELINE
- TEMPORARY WORK SPACE
- WETLAND (SURVEYED)
- PROPOSED ACCESS ROAD

0 50 100 Feet

EXISTING MAINLINE VALVE SITE = 0.02 ACRES
TEMPORARY WORK SPACE = 0.04 ACRES
PROPOSED ACCESS ROAD = 0.02 ACRES

HGA HUNT, GUILLOT & ASSOCIATES, LLC
ONE HERCULEX DRIVE, SUITE 300
BIRMINGHAM, AL 35209
PHONE 205-970-4977
FIRM # PA 4004148

ADELPHIA GATEWAY, LLC
AERIAL MAP
PAOLI PIKE BLOWDOWN M.P. 14.46
CHESTER COUNTY,
PENNSYLVANIA

SCALE 1" = 50' DRAWING NUMBER RR01-FIGURE 1-19b REV 3

						DRAWN BY	MSF	12/15/17
						DESIGNED BY	PLH	12/15/17
						CHECKED BY	MEH	12/21/17
						APPROVED BY	RCH	12/21/17
						HGA JOB NO.	8.A17022.01.0	
						PLOT SCALE	1:1	
						MODEL ID	8.A17022	
REV	DESCRIPTION	CHK	DATE	APP	DATE			
3	RE-ISSUED FOR FERC	MEH	08/20/2018	RCH	08/20/2018			
2	NOT USED							
1	RE-ISSUED FOR FERC	MEH	06/18/2018	RCH	06/18/2018			
0	ISSUED FOR FERC	MEH	12/29/2017	RCH	12/29/2017			



RR01 - FIGURE 1-19b

AREA NEEDED TO WORK ON VALVE

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Environmental Data Request #3 Dated September 12, 2018
OEP/DG2E/Gas Branch 1
October 11, 2018 Supplemental Response

Resource Report 10 – Alternatives

26. As previously requested (EIR#2, RR10, comment 6), provide a site alternative analysis for the aboveground facilities listed below that addresses the corresponding concern(s) raised by stakeholders. The justification previously provided for not identifying alternative sites is not sufficient given that impacts on additional land (i.e., alternative site locations) would be temporary, and no additional permanent impacts were identified. Include figures depicting the proposed and alternatives sites:

- a. **Paoli Pike Gate Blowdown Assembly** – to avoid impacts on a wetland that provides habitat for bog turtles;
- b. **Perkiomen Creek Blowdown Assembly** – to increase the offset from nearby businesses and school and to avoid permanent impacts on a wetland; and
- c. **Pickering Creek Gate Blowdown Assembly** – to avoid lands identified as preserved organic farmland.

Response:

Figures showing the locations of the alternative valve location sites evaluated for the Paoli Pike Gate Blowdown Assembly and the Perkiomen Creek Blowdown Assembly are provided in Attachment DR3_RR10_26.

- a. **Paoli Pike Gate Blowdown Assembly** – In order to maintain compliance with Department of Transportation regulations at 49 C.F.R. Part 192, this valve can be moved no further than 0.31 mile north, along the line, from its current location. Within that 0.31 mile, the current pipeline alignment approximately parallels the waterbody identified as PP-W-01 and associated wetlands, which would not remove the valve from the potential bog turtle habitat. Additionally, relocating the valve in this direction would decrease the spacing between the valve and the nearest resident from 415 feet to as little as 75 feet, depending on the exact location selected, and would increase the total permanent disturbance required for a permanent access road. For these reasons, Adelphia believes there are no viable alternatives to the north.

In order to maintain compliance with Department of Transportation regulations at 49 C.F.R. Part 192, this valve can be moved no further than 4.66 miles south, along the line, from its current location. In compliance with the regulations, the valve can be placed as far south as MP 9.8. However, taking into account the fact that the Chester Creek valve is located at MP 9.53, and operational optimization, Adelphia considered the viable alternative to be any location north of MP 13. Adelphia evaluated several sites within this area to identify potential locations with close proximity to existing roadways to minimize disturbance needed for new permanent access roads and that were at a minimum of 300 feet away from any wetlands and waterbodies to avoid impacts to potential bog turtle habitats. Of the areas identified that met both of the above criteria, all of the potential

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Environmental Data Request #3 Dated September 12, 2018
OEP/DG2E/Gas Branch 1
October 11, 2018 Supplemental Response

alternate locations moved the valve closer to residences and/or businesses than the current location (in some cases as close as 30 feet). While Adelphia always strives to minimize impacts to the environment, it also focuses on minimizing impacts to residences and businesses.

Further, an analysis of the current valve site reveals that relocation of that valve site would not reduce permanent operational impacts to the site. The identified wetlands are within the existing easement of the pipeline. While operational disturbance for valve maintenance, which is performed once per year, would no longer need to occur, the following maintenance activities requiring access/disturbance to the same area would continue to occur at the following frequencies:

- i. Once per year for cathodic protection test;
- ii. Once per year for leak surveys;
- iii. Once per quarter for visual inspection (patrolling); and
- iv. Once per year for mowing and right-of-way maintenance.

Accordingly, Adelphia does not believe that relocating the existing valve to a new location would add any benefit to the operations or reduce any permanent impacts to the environment or surrounding areas.

Figure **RR01-FIGURE1-19b-ALT** shows the location of alternative sites that Adelphia reviewed, and the following table compares impacts associated with each location. The impacts included for each alternative include the impacts to remove the valve from the existing site.

Comparison of Paoli Pike Valve Site Alternatives for the Adelphia Gateway Project					
Category	Existing Valve Site (Preferred)	Alternate 1	Alternate 2	Alternate 3	Alternate 4
Total Land Disturbance (acres)	0.06	0.12	0.12	0.12	0.12
Nearest Residence (feet)^d	357	175	72	65	80
Residences within 300 feet	0	2 ^a	6 ^b	8 ^c	10 ^b
Bog Turtle Habitat	1	0	0	0	0
Land Use					
Acreage (Percent)					
Agriculture	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
Forest	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
Open Land	0.04	0.10 (83.3)	0.10 (83.3)	0.10 (83.3)	0.10 (83.3)
Residential	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Environmental Data Request #3 Dated September 12, 2018
OEP/DG2E/Gas Branch 1
October 11, 2018 Supplemental Response

Industrial	0.02	0.02 (16.7)	0.02 (16.7)	0.02 (16.7)	0.02 (16.7)
Water	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
^a Two Apartment Buildings. Actual number of residences in apartment buildings is unknown from aerial imagery.					
^b Includes three apartment Buildings. Actual number of residences in apartment buildings is unknown from aerial imagery.					
^c Includes four apartment Buildings. Actual number of residences in apartment buildings is unknown from aerial imagery.					
^d Distances are approximated using available aerial imagery.					

- b. Perkiomen Creek Blowdown Assembly – In order to maintain compliance with Department of Transportation regulations at 49 C.F.R. Part 192, this valve can be moved no further than 1.37 miles north, along the line, from its current location. Adelphia evaluated several sites within this area to identify potential locations with close proximity to existing roadways to minimize disturbance needed for new permanent access roads. Moving the valve in this location would increase the distance between the valve and the nearest structure or residence; however, both locations evaluated would be located on property owned by Montgomery County and currently designated as Perkiomen Park. For this reason, Adelphia believes the current location is the preferred location.

In order to maintain compliance with Department of Transportation regulations at 49 C.F.R. Part 192, this valve can be moved no further than 1.29 miles south, along the line, from its current location. Adelphia evaluated several sites within this area to identify potential locations with close proximity to existing roadways to minimize disturbance needed for new permanent access roads. Moving the valve in this location decreased the distance to the nearest residence from 455 feet to as little as 120 feet based on selected locations. The nearest structure to the existing location is a municipal complex 230 feet away, which is still further than the potential 120 feet to the nearest residence if the valve were moved. For this reason, Adelphia believes the current location is the preferred location.

Further, an analysis of the current valve site reveals that relocation of that valve site would not reduce permanent operational impacts to the site. The identified wetlands are within the existing easement of the pipeline. While operational disturbance for valve maintenance, which is performed once per year, would no longer need to occur, the following maintenance activities requiring access/disturbance to the same area would continue to occur at the following frequencies:

- i. Once per year for cathodic protection test;
- ii. Once per year for leak surveys;
- iii. Once per quarter for visual inspection (patrolling); and
- iv. Once per year for mowing and right-of-way maintenance.

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Environmental Data Request #3 Dated September 12, 2018
OEP/DG2E/Gas Branch 1
October 11, 2018 Supplemental Response

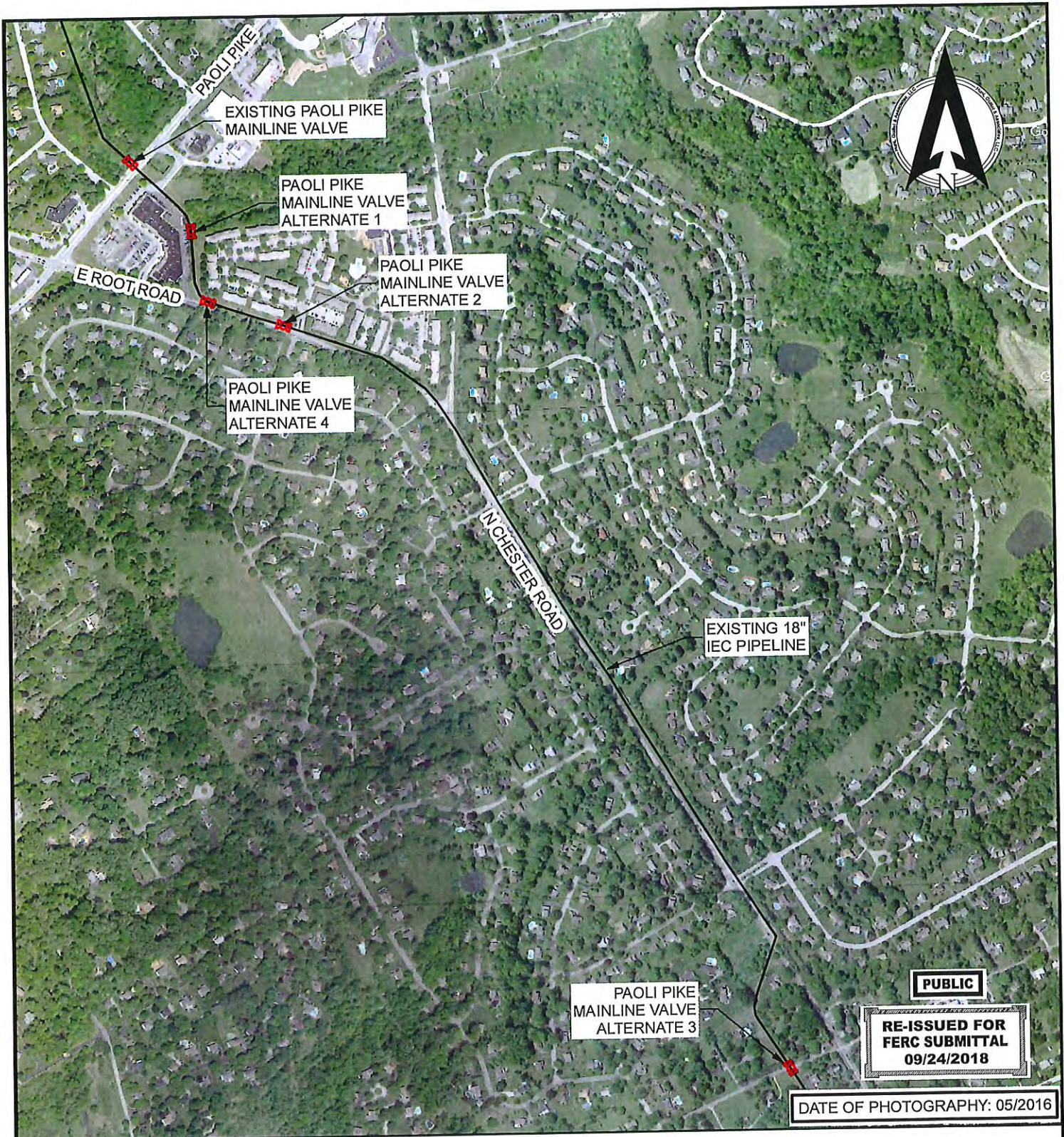
Accordingly, Adelphia does not believe that relocating the existing valve to a new location would add any benefit to the operations or reduce any permanent impacts to the environment or surrounding areas.

Figure RR01-FIGURE1-24b-ALT shows the location of alternative sites that Adelphia reviewed, and the following table compares impacts associated with each location. The impacts included for each alternative include the impacts to remove the valve from the existing site.

Comparison of Perkiomen Creek Valve Site Alternatives for the Adelphia Gateway Project					
Category	Existing Valve Site (Preferred)	Alternate 1	Alternate 2	Alternate 3	Alternate 4
Total Land Disturbance (acres)	0.08	0.16	0.16	0.16	0.16
Nearest Residence (feet)^a	455	995	595	490	790
Nearest Business (feet)^a	277	53	1000	1420	1364
Residences within 300 feet	0	0	0	0	0
Publicly Owned Parcels Affected	0	1	1	1	1
Land Use					
Acreage (Percent)					
Agriculture	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
Forest ^a	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
Open Land	0.06 (66.7)	0.14 (87.5)	0.14 (87.5)	0.14 (87.5)	0.14 (87.5)
Residential	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
Industrial	0.02 (33.3)	0.02 (12.5)	0.02 (12.5)	0.02 (12.5)	0.02 (12.5)
Water	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)	0.0 (0.0)
^a Distances are approximated using available aerial imagery.					

- c. Pickering Creek Gate Blowdown Assembly – As addressed in response to Resource Report 4, Request 17 in this Response, the proposed modifications to the Pickering Creek Gate Blowdown Assembly have been removed from the scope of the Project and, thus, construction impacts to lands proximate to that site will be avoided.

Respondent: Keith Edmonds
Position: Project Manager
Telephone: (732) 919-8292



LEGEND

- ALTERNATE SITE
- EXISTING PIPELINE

0 800 1,600 Feet

						DRAWN BY	MSF	12/15/17
						DESIGNED BY	PLH	12/15/17
						CHECKED BY	MEH	12/21/17
						APPROVED BY	RCH	12/21/17
3	ISSUED FOR FERC	MEH	09/24/2018	RCH	09/24/2018	HGA JOB NO.	8.A17022.01.0	
2	NOT USED					PLOT SCALE	1:1	
1	NOT USED					MODEL ID	8.A17022	
0	ISSUED FOR FERC	MEH	12/29/2017	RCH	12/29/2017			
REV	DESCRIPTION	CHK	DATE	APP	DATE			



HUNT, GUILLOT & ASSOCIATES, LLC
ONE METROPLEX DRIVE, SUITE 100
BIRMINGHAM, AL 35209
PHONE: 205-970-4977
FIRM # PA 4004148

ADELPHIA GATEWAY, LLC
AERIAL MAP
PAOLI PIKE ALTERNATE SITES
CHESTER COUNTY,
PENNSYLVANIA

SCALE 1" = 800' DRAWING NUMBER RR01-FIGURE 1-19b ALT REV 3

RR01 - FIGURE 1-19b ALT

PUBLIC

RE-ISSUED FOR
FERC SUBMITTAL
09/24/2018

DATE OF PHOTOGRAPHY: 05/2016

10/9/2018 2:12:18 PM mfwier

20181130

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Staff Data Request Dated November 21, 2018
OEP/DG2E/Gas Branch 1
November 30, 2018 Response

2. Based on Adelphia's November 19, 2018 filing proposing modifications to certain facilities, provide additional justification for the expansion of the proposed access road (AR-14.46-01) into the adjacent wetland (PP-W-01) at the Paoli Pike blowdown assembly site, including:
- a. copies of applicable correspondence from the state agency that requested the expansion and relocation of the access road and the addition of gravel; and
 - b. mitigation measures to reduce impacts on the wetland (PP-W-01) and associated wildlife where the access road would be filled;
 - c. clarify why this access road was relocated and expanded into the adjacent wetland rather than remaining at the more direct access from Paoli Pike Road;
 - d. clarify what Adelphia is proposing as compensatory mitigation for any proposed project wetland fill.

Response:

- a. Adelphia has been coordinating with the appropriate agencies to ensure that Adelphia is addressing those agencies' concerns and requirements for the proposed work, though Adelphia does not have formal correspondence to/from state agencies regarding the additional space required for a rock construction entrance at the Paoli Pike Blowdown Assembly Site. The additional access road area (i.e., rock construction entrance) is required by the Chester County Conservation District's (CCCD) Erosion & Sediment Control requirements, as outlined in the State of Pennsylvania's Erosion and Sediment Control Manual.
- b. Adelphia would install the temporary rock construction entrance according to PennDOT standards with the following exceptions, which would apply to the portion of the rock construction entrance within wetland PP-W-01:
 - i. Adelphia would not clear and grub vegetation within the wetland;
 - ii. Adelphia would not excavate within the wetland; and
 - iii. Adelphia would place timber mats in the wetland prior to the placement of geotextile fabric to prevent rutting and soil compaction.

Adelphia submitted an application to the PADEP for a temporary crossing of the wetland PP-W-01. Adelphia would adhere to conditions contained within the permit, if granted. Adelphia would follow recommendations made by

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Staff Data Request Dated November 21, 2018
OEP/DG2E/Gas Branch 1
November 30, 2018 Response

jurisdictional agencies or work with them to develop alternative measures that would provide equal or greater protection for wildlife and wetlands. Adelphia has been continually consulting with agencies regarding the Project and will update them of this proposed Project modification. Adelphia will continue to file copies of all agency correspondence with the FERC.

Due to the small size of the rock construction entrance, its temporary nature, and Adelphia's use of mitigation measures and adherence to permit conditions and agency recommendations, Adelphia does not expect the additional temporary workspace at the Paoli Pike Blowdown Site to adversely affect wetlands or wildlife.

- c. As modified, the access to the Paoli Pike Gate valve remains directly from Paoli Pike Road. There is an existing access road, which Adelphia will continue to utilize for operations and is sufficiently sized for operations vehicles. However, as discussed above, a rock construction entrance is required by the CCCD to access the Paoli Pike Blowdown Site during construction activities. Due to the presence of a guardrail at the existing entrance of the Paoli Pike Blowdown Site from the adjacent roadway, in order to accommodate the PADEP's sizing requirements for the rock construction entrance, and to accommodate construction equipment, the rock construction entrance was expanded into the adjacent area.
- d. Adelphia is not proposing any permanent wetland fill as part of the rock construction entrance at the Paoli Pike Blowdown Site. Other wetland impacts associated with work at the Paoli Pike Blowdown Site would be less than 0.05 acre and are considered de minimis by the PADEP. The PADEP does not require compensatory mitigation for de minimis impacts. Therefore, Adelphia is not proposing compensatory mitigation for wetland impacts at the Paoli Pike Blowdown Site.

Because total Project-related impacts to waters of the U.S. would be minimal, Adelphia intends to comply with federal Clean Water Act requirements by obtaining a Pennsylvania State Programmatic General Permit-5 (PASPGP-5), which the PADEP would attach to Adelphia's state permits, if granted. Adelphia has filed or is in the process of filing permit applications with the PADEP for all Project-related impacts to wetlands. All submitted applications are currently under review. Adelphia will adhere to all PADEP regulations and recommendations regarding wetland impacts and associated mitigation, as specified in the permits.

Adelphia Gateway, LLC – Docket No. CP18-46-000
Response to Staff Data Request Dated November 21, 2018
OEP/DG2E/Gas Branch 1
November 30, 2018 Response

Respondent: Keith Edmonds
Position: Project Manager
Telephone: (732) 919-8292

#3

Memo

East Goshen Township

Voice (610) 692-7171

E-mail rsmith@eastgoshen.org

Date: January 11, 2019

To: Pipeline Task Force

From: Rick Smith, Township Manager

Re: Adelphia Gateway Environment Assessment

- Page 7 **New Pipeline Facilities** They plan to install 77 percent of the 3.6 miles of the new pipe in Delaware County by HDD. They have not determined how much additional land will be disturbed for cathodic protection.
- Page 8 **Table A-2** They will disturb 0.1 acre for work on the Paoli Pike Valve
- Page 12 **Table A-4** they will need to build an access road to the Paoli Pike Valve
- Page 14 **6. Construction Schedule and Workforce** They plan to work Monday to Saturday 6:30 am to 6:30 pm.
- Page 15 **7. Construction, Operations and Maintenance Procedures** FERC approved modification to standard procedure to work with 50 feet of wetlands
- Page 39 **HDD Feasibility and Geotechnical Investigation**
- Comment: there are no HDDs in East Goshen. Do we want to get involved with the HDDs in Delaware County based on our experiences?
- Page 133 **8.2 Noise and Vibration (attached)**
- Page 134 "Adelphia has stated it would comply with all local noise ordinances during construction."
- Page 141 no significant noise or vibration impacts
- Page 174 **C. ALTERNATIVES** This section outlines the process for evaluation alternatives
- Page 189 **Paoli Pike BAV Alternatives** They looked at four alternatives (attached)

Page 194 **D. CONCLUSIONS AND RECOMMENDATIONS** They determined that approval of this proposal "would not constitute a major federal action significantly affecting the quality of the human environment. (attached)

Page 195 eminent domain is limited

Page 197 inspectors required to document compliance with "local" permit requirements

Cc: Board of Supervisors

F:\Data\Shared Data\Admin Dept\Adelphia\Memo to Task Force 011119.docx

8.2 Noise and Vibration

Noise is generally defined as sound with intensity greater than the ambient or background sound pressure level. Construction and operation of the Project would affect overall noise levels in the Project area. The magnitude and frequency of environmental noise may vary considerably over the course of the day, throughout the week, and across seasons, in part due to changing weather conditions and the effects of seasonal vegetative cover. Two measures that relate the time-varying quality of environmental noise to its known effect on people are the 24-hour equivalent sound level (L_{eq}) and day-night sound level (L_{dn}). The L_{eq} is an A-weighted sound level containing the same energy as the instantaneous sound levels measured over a specific time period. Noise levels are perceived differently, depending on length of exposure and time of day. The L_{dn} takes into account the duration and time the noise is encountered. Specifically, the L_{dn} is the L_{eq} plus a 10 decibel (dB) on the A-weighted scale (dBA) penalty added to account for people's greater sensitivity to nighttime sound levels (typically considered between the hours of 10:00 p.m. and 7:00 a.m.). The A-weighted scale is used to assess noise impacts because human hearing is less sensitive to low and high frequencies than mid-range frequencies. The human ear's threshold of perception for noise change is considered to be 3 dBA; 5 dBA is clearly noticeable to the human ear, and 10 dBA is perceived as a doubling of noise (Bies and Hansen 1988).

Regulatory Noise Requirements

In 1974, the USEPA published *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* (USEPA 1974). This document provides information for state and local regulators to use in developing their own ambient noise standards. The USEPA has indicated that an L_{dn} of 55 dBA protects the public from indoor and outdoor activity interference. We have adopted this criterion and use it to evaluate the potential noise impacts from the proposed Project at noise sensitive areas (NSA). NSAs are defined as homes, schools, churches, or any location where people reside or gather. FERC requires that the noise attributable to any new compressor engine or modifications during full load operation not exceed an L_{dn} of 55 dBA at any NSAs. Due to the 10 dBA nighttime penalty added prior to the logarithmic calculation of the L_{dn} , for a facility to meet the 55 dBA L_{dn} limit, it must be designed such that actual constant noise levels on a 24-hour basis do not exceed 48.6 dBA L_{eq} at any NSA. This noise requirement is also applied to temporary nighttime construction noise, unless ambient noise levels are greater than 55 dBA L_{dn} , in which case nighttime construction noise must be less than 10 dBA over ambient noise levels.

In addition to FERC's requirements, described above, state and local noise ordinances are relevant to the Project. The proposed Quakertown facilities would be on

the border of Richland Township and West Rockhill Township in Bucks County, Pennsylvania, both of which have established noise ordinances based on land use categories. The Quakertown facilities would be adjacent to residential, open, and agricultural land in the Richland Township and adjacent to residential, agricultural land within West Rockhill Township. Per the Richland Township noise ordinance, maximum permissible sound levels in residential, open, and agricultural land are established for daytime and nighttime activity (55 dBA and 50 dBA, respectively). Per the West Rockhill Township, permissible sound levels in agricultural and residential land must not exceed 60 dBA during the day and 55 dBA at night; permissible noise levels established for industrial land are higher.

Lower Chichester Township, where the Marcus Hook Compressor Station is proposed in industrial land, also has a noise ordinance based on land use categories. The permissible sound level for activities in industrial land is 70 dBA at all times. New Castle County, Delaware, which abuts the border of the proposed compressor station, has a land use categorized noise ordinance similar to that of Lower Chichester Township. The permissible sound level for activities in industrial districts is 85 dBA at all times.

Adelphia has stated that it would comply with all local noise ordinances during construction of the Project and would make all reasonable efforts during operations to comply. Therefore, because FERC's noise requirements are specific to individual NSAs, the local ordinances are not addressed further.

Ambient Noise Conditions

Generally, land use in the Project area is primarily industrial/commercial land; however, the Project would also affect residential, open, and forested land. Day and night noise data were collected by Adelphia at the NSAs nearest to the Quakertown facilities and Marcus Hook Compressor Station during December 12, and 13, 2017 and at monitoring locations relative to each HDD entry and exit location during June 13, and 15, 2018. The results of the noise surveys are presented in tables B-23 and B-24, below, as ambient sound levels.

General Impacts and Mitigation

Construction

Noise would be generated during construction of the Project. Construction activities, and especially pipeline construction, in any one area could last from several weeks to several months on an intermittent basis and would result in an increase in ambient noise. Construction of the Quakertown and Marcus Hook Compressor Stations would require a longer construction timeframe at a single location than other facilities planned for the Project. Construction noise is highly variable as equipment operates

intermittently. The type of equipment operating at any location changes with each construction phase. The noise level impacts on NSAs along the pipeline rights-of-way and near aboveground facilities due to typical construction activities would depend on the type of equipment used, the duration of use for each piece of equipment, the number of construction vehicles and equipment used simultaneously, and the distance between the source and receptor. While individuals in the immediate vicinity of the construction activities would experience an increase in noise, this impact would be temporary and local.

Adelphia anticipates that the majority of typical Project construction would occur during daylight hours, generally between the hours of 6:30 a.m. to 6:30 p.m. However, Adelphia states that certain construction activities, including drilling activities at HDD-5 and HDD-9 and pipeline pullback at the remaining HDD sites, would occur at night. Other activities often conducted at night include operation of pumps at dry-ditch waterbody crossings, hydrostatic testing, and tie-ins; these activities typically generate little noise and do not result in significant noise impacts. Adelphia may opt to perform these activities, that are minimally disruptive to nearby residents, at night.

Adelphia proposes to install the Tilghman Lateral using HDD construction methods at nine sites along the pipeline right-of-way (see table A-5). HDD construction would be conducted primarily during daytime hours. However, Adelphia would conduct 24-hour drilling at two of the nine HDD sites (HDD-5 and HDD-9). The remaining HDD sites would be completed during the daytime hours only. For all HDD activities, Adelphia would install residential-grade exhaust mufflers on all noise-generating combustion equipment used during HDD construction. In order to reduce noise impacts, Adelphia would also limit drilling operations to one HDD at a time for all HDDs within 0.5 mile. Adelphia estimates that each HDD would take 2 to 14 days to complete.

Adelphia estimated the noise impacts of HDD activities, including 24-hour HDD, at NSAs near each HDD site. The HDDs would be completed in densely populated areas with numerous NSAs near each HDD. Table B-23 shows the predicted noise impacts at the most impacted NSA near the HDD sites. Appendix J estimates the noise level impacts at the majority of NSAs or clusters of NSAs near the HDD sites. The distances and directions to the nearest NSAs from each of the nine HDD locations are also presented in table B-23 and appendix J, and are shown in appendix K-1.

Acoustical Survey and Analysis Summary for Horizontal Directional Drills at the NSAs with the Greatest Impacts ^a					
NSA Most Impacted by Noise	Distance and Direction of NSA from HDD Location (entry/exit; feet)	Estimated L _{dn} due to Project Construction (dBA)	Existing Ambient L _{dn} (dBA)	L _{dn} of Construction plus Ambient L _{dn} (dBA)	Potential Increase Above Ambient (dBA) ^a
HDD-1 Entry and Exit					
CS NSA-1a	121 northwest / 1,889 southwest	72.1	68.2	73.6	5.4
HDD-2 Entry and Exit					
HDD NSA-3	3,025 northwest / 99 north	71.5	61.8	71.9	10.1
HDD-3 Entry and Exit					
HDD NSA-3	4,474 southwest / 107 north	70.7	61.8	71.2	9.4
HDD-4 Entry and Exit					
HDD NSA-10	143 northwest / 2,505 northwest	70.7	67.0	72.2	5.2
HDD-5 Entry and Exit					
HDD NSA-12	604 west / 1,197 northwest	68.0	63.6	69.4	5.8
HDD-6 Entry and Exit					
HDD NSA-16	118 north / 2,677 southwest	72.5	66.1	73.4	7.3
HDD-7 Entry and Exit					
HDD NSA-19	92 north / 1,599 southwest	74.3	70.1	75.7	5.6
HDD-8 Entry and Exit					
HDD NSA-28	1,933 northwest / 109 north	70.9	69.4	73.2	3.8
HDD-9 Entry and Exit					
HDD NSA-29	424 north / 851 northwest	70.1	65.7	71.5	5.8
^a Noise is based on HDD drilling operations occurring during daytime periods only (with the exception of HDD 5 and HDD 9, which would occur 24 hours a day), with all combustion engines to be fitted with a residential-grade exhaust muffler, and where appropriate, low-noise equipment would be used.					

While noise from HDD construction would exceed 55 dBA L_{dn} at the NSAs most affected near each drill, the majority of these HDDs would be completed during daytime hours to minimize impacts on nearby residents. However, HDD-5 and HDD-9 would be constructed over a 24-hour period. At these sites, because ambient sound levels exceed 55 dBA L_{dn} , HDD construction must not result in noise impacts greater than 10 dBA over ambient noise levels. The acoustical analysis in table B-23 indicates that construction noise at HDD 5 and HDD-9 would result in noise impacts that are 5.8 dBA greater than ambient noise levels at both sites, which is less than 10 dBA. Therefore, while residents in the Project area would be impacted by noise from Project construction, based on our analyses, the mitigation measures proposed (including daytime construction at most HDDs), and the temporary and short-term nature of construction, we conclude that construction of the Project would not result in significant noise impacts on local residents and the surrounding communities.

Operations

The new compressor stations would generate sound on a continuous basis (i.e., up to 24 hours per day) when operating. Some sound would also be generated by the operation of the new and existing meter stations. Noise impacts associated with the operation of these aboveground facilities would be limited to the vicinity of the facilities. The specific operational noise sources associated with these facilities and their estimated impact at the nearest NSAs are described below.

We received comments expressing concern regarding noise impacts at residences in the vicinity of the proposed compressor stations; the noise analysis addresses impacts at the NSAs nearest to each compressors station. Therefore, residences in the immediate vicinity of the Project facilities are included in this assessment. The Delaware Riverkeeper Network raised comments regarding noise from the compressor stations and pipelines; we also received comments expressing concern for impacts associated with vibration from operation of the proposed compressor stations. In addition to noise requirements, the Commission requires that applicants address vibration when proposing to construct compressor stations. The mitigation measures that Adelphia would implement to reduce noise to the levels required by FERC would also serve to reduce potential sources of vibration at the compressor stations. Through FERC's dispute resolution service helpline, we are aware that induced vibration, or a low frequency sound from pipelines, has occurred at a limited number of natural gas facilities in the over 300,000 miles of transmission pipeline in the United States. However, we are unaware of wide-scale cases of low frequency noise/vibration from natural gas transmission pipelines. With hundreds of thousands of residents near natural gas pipelines, we have seen no systemic evidence that natural gas pipelines are inducing low frequency noise effects on local residences. This appears to be an isolated issue that continues to be addressed through the dispute resolution service and landowner helpline.

Adelphia conducted ambient sound surveys and acoustical impact assessments for the nearest NSAs to the proposed Quakertown and Marcus Hook Compressor Stations and five meter stations.⁴⁰ The distances and directions to the nearest NSAs from the compressor and meter stations are presented in table B-24 and shown in appendix K-2.

Table B-24 Acoustical Analysis of the Proposed Compressor and Meter Stations					
NSA	Distance and Direction of NSA	Existing Ambient L _{dn} (dBA)	L _{dn} Attributable to New Station (dBA)	Existing L _{dn} + L _{dn} of Proposed Changes (dBA)	Potential Increase Above Ambient (dBA)
Marcus Hook Compressor Station					
NSA-1a ^a	630 feet northwest	65.8	53.5	66.0	0.2
NSA-1b	530 feet northwest	65.8	52.2	66.0	0.2
NSA-2	2,780 feet northeast	63.2	40.8	63.2	0.0
Quakertown Compressor and Meter Stations^b					
NSA-1	530 feet west	44.9	42.5	46.9	2.0
NSA-2	630 feet southeast	53.8	40.3	54.0	0.3
NSA-3	640 feet south	50.6	38.4	50.9	0.3
Delmarva Meter Station (with mitigation)					
MS NSA-1	312 feet north	59.5	54.2	60.6	1.1
Monroe Meter Station (no mitigation)					
NSA-15	686 feet northeast	67.0	58.2	67.5	0.5
Tilghman Meter Station (no mitigation)					
NSA-28	535 feet northwest	68.0	60.7	68.7	0.7
Transco Meter Station (no mitigation)					
CS NSA-2	1,293 feet northeast	63.2	51.9	63.5	0.3
^a Daytime and nighttime ambient sound measurements for NSA-1a were collected at NSA-1b. ^b Daytime and nighttime ambient sound measurements for NSA-1, NSA-2, and NSA-3 were collected at monitoring points Alt NSA-1, Alt NSA-2, and Alt NSA-3, respectively, as depicted in appendix K-2.					

⁴⁰ The Delmarva Meter Station would include delivery interconnects to Columbia, Delmarva, and TETCO. Noise impact associated with the new Quakertown Meter Station was modeled with the proposed Quakertown Compressor Station.

Adelphia has committed to installation of the following noise control measures at the compressor stations based on its noise consultant's recommendations:

- hospital grade silencers;
- station piping below ground to the extent possible and acoustical lagging on aboveground pipes in proximity to the property boundary;
- an acoustically-insulated compressor building;
- a noise-attenuating enclosure for emergency generator; and
- inlet and discharge mufflers on intakes and exhausts on compressor buildings.

Based on the results in table B-24, and the mitigation measures committed to by Adelphia, the two new compressor stations would meet FERC's sound level requirements at the nearest NSAs. Additionally, the compressor stations would be in compliance with local noise ordinances. To ensure Project-related sound level impacts do not exceed our criterion, **we recommend that:**

- **Adelphia should file with the Secretary noise surveys for the Marcus Hook Compressor Station and Quakertown Compressor and Meter Stations no later than 60 days after placing the stations into service. If full power load condition noise surveys are not possible, Adelphia should file an interim survey at the maximum possible power load within 60 days of placing the stations into service and file the full power load survey within 6 months. If the noise attributable to operation of all equipment at the station under interim or full power load conditions exceeds an Ldn of 55 dBA at any nearby NSA, Adelphia should:**
 - a. **file a report with the Secretary, for review and written approval by the Director of OEP, on what changes are needed;**
 - b. **install additional noise controls to meet that level within 1 year of the in-service date; and**
 - c. **confirm compliance with this requirement by filing a second full power load noise survey with the Secretary for review and written approval by the Director of OEP no later than 60 days after it installs the additional noise controls.**

In addition to the operational sound level impacts discussed above, there would also be emergency blowdown events during which the compressor stations would generate additional sound for short periods of time. While routine compressor station

maintenance blowdowns are included in the estimates in table B-24, emergency blowdown events could occur once annually for a duration of 10 minutes and vents used for emergency blowdowns would not be fitted with silencers. Given the non-routine nature and short-term duration of these blowdown events, we do not believe that they would result in significant impacts on nearby residents.

Adelphia also estimated the sound level impacts at the NSAs associated with operation of the meter stations and found that operation of the Transco, Monroe, and Tilghman Meter Stations would not be greater than the ambient sound level measured at the nearest NSAs. While operation of the Monroe and Tilghman Meter Stations would result in sound levels greater than 55 dBA L_{dn} at the nearest NSAs, the resulting increase in ambient sound levels would not be audible, and would be less than 1 dBA (see table B-24). Noise impacts from operation of the Delmarva Meter Station are predicted to be higher than ambient sound levels. To mitigate noise associated with operation of this meter station, Adelphia would implement one of the following noise reduction techniques based on its noise consultant's recommendations:

- use valves with low or ultra-noise trims;
- acoustically-insulate regulator buildings;
- install acoustical lagging on above-ground piping; and/or
- install low noise heaters.

Adelphia has not identified the specific mitigation measures it would implement to ensure compliance with our guideline that noise from operation of the Delmarva Meter Station not exceed 55 dBA L_{dn} . Therefore, we recommend that:

- **Prior to construction of the Delmarva Meter Station, Adelphia should file with the Secretary, for review and written approval by the Director of OEP, a description of the specific noise mitigation measures it would install at the Delmarva Meter Station and the associated noise levels predicted for full flow/load condition operations.**

It is our experience that meter stations can vary widely in terms of actual sound level impacts after being placed in service relative to the predicted impacts from these stations. In addition, the number of residences in proximity to meter stations further justifies the need for post-construction sound level surveys. To verify the accuracy of Adelphia's acoustical analyses and ensure sound levels do not exceed our criterion, we recommend that:

- **Adelphia should file with the Secretary noise surveys for the Transco, Monroe, Tilghman, and Delmarva Meter Stations no later than 60 days**

after placing the stations into service. If full flow/load condition noise surveys are not possible, Adelphia should file an interim survey at the maximum possible power load within 60 days of placing the stations into service and file the full flow/load survey within 6 months. If the noise attributable to operation of all equipment at each meter station under interim or full power load conditions exceeds an L_{dn} of 55 dBA at any nearby NSA, Adelphia should:

- a. file a report with the Secretary, for review and written approval by the Director of OEP, on what changes are needed;
- b. install additional noise controls to meet that level within 1 year of the in-service date; and
- c. confirm compliance with this requirement by filing a second full power load noise survey with the Secretary for review and written approval by the Director of OEP no later than 60 days after it installs the additional noise controls.

Finally, as described above for compressor stations, emergency blowdowns could be required at each MLV and BAV site along the Project. Noise impacts at these locations would be limited to the duration of the release relative to the specific emergency situation. Adelphia would design these facilities in accordance with USDOT-PHMSA regulation 192.179(c), which requires a rapid release. Installation of silencers would limit the amount of gas released, which could exacerbate the emergency situation. Given the non-routine nature and short-term duration of these blowdown events, we do not believe that these events would be a significant contributor to operational sound levels from the Project.

The compressor units that Adelphia proposes would meet design standards defined by the American Petroleum Institute to limit pulsation, as well as design requirements to identify and minimize stresses due to pressure and/or temperature. Each engine unit would include sensors to monitor and avoid vibration, pulsation, and over stress materials. Associated piping would be similarly designed to minimize operational effects from pressure and temperature to reduce vibration. Construction methods, such as blasting and pile driving, which are published sources of ground vibration, are not proposed for this Project. Additionally, based on the soil borings collected at the compressor stations sites, the underlying soil material would also act to dampen minor vibrations cause by the operation of the compressors. Therefore, we do not expect the Project would result in any adverse vibration on nearby residents, NSAs, or historical structures.

Based on the analyses conducted, Adelphia's proposed mitigation measures, and our recommendations, we conclude that construction and operation of the Project would

not result in significant noise or vibration impacts on residents or the surrounding communities.

9. Reliability and Safety

The transportation of natural gas by pipeline involves some incremental risk to the public due to the potential for accidental release of natural gas. The greatest hazard is a fire or explosion following a major pipeline rupture.

Methane, the primary component of natural gas, is colorless, odorless, and tasteless. It is not toxic, but is classified as a simple asphyxiate, possessing a slight inhalation hazard. If inhaled in high concentrations, oxygen deficiency can result in serious injury or death. Methane has an auto-ignition temperature of over 1,000 degrees Fahrenheit and is flammable at concentrations between 5 and 15 percent in air. An unconfined mixture of methane and air is not explosive; however, it may ignite if there is an ignition source present. A flammable concentration within an enclosed space in the presence of an ignition source can explode. Methane is buoyant at atmospheric temperatures and disperses upward rapidly in air.

9.1 Existing Pipeline

Numerous commenters expressed concern with the age of the Existing System and the conversion from fuel oil to natural gas on the southern segment of the existing mainline. IEC installed the existing mainline in the 1970s, however the 20-inch-diameter pipeline was installed in 2002. As reviewed in section A, after Adelphia acquires the Existing System, the northern segment of the existing mainline and the 20-inch-diameter pipeline would remain in operation as is and no changes are proposed. Alternatively, the southern segment of the existing mainline would require a conversion of service, which would result in the addition of compression and aboveground appurtenant facilities (see section A.4). In anticipation of the conversion of service, IEC completed numerous actions to ensure and verify the integrity of the southern segment of the existing mainline, including the following:

- review of design, construction, and operations and maintenance history;
- visual inspection of the rights-of-way, all aboveground segments, and select underground segments;
- correction of all known unsafe defects and conditions as required by USDOT-PHMSA;
- design pressure testing;

MLV 2 Alternatives

USDOT-PHMSA regulations require that MLV 2 be between MPs 17.1 and 18.9. The proposed MLV 2 is at MP 17.9 in the existing right-of-way within an industrialized area. Alternative MLV sites were reviewed at MPs 17.2, 17.9 (235 feet north of the proposed MLV 2 location), and 18.5 (see figure 9). Each alternative would also be in the existing right-of-way and alternatives at MPs 17.9, and 18.5 would be in close proximity to industrial areas, while the alternative at MP 17.2 would be in a residential area. The alternative site at MP 17.9 would be constrained during construction due to steep side slopes. The alternative at MP 18.5 could encounter contaminated soils from the industrial activities during construction. Based on these factors, none of MLV alternatives provide a significant environmental advantage over the proposed MLV 2.

Paoli Pike BAV Alternatives

We evaluated alternatives to the Paoli Pike BAV site in an effort to avoid impacts on a wetland that could provide potential habitat for bog turtles. To maintain compliance with USDOT-PHMSA regulations, Adelphia stated that the valve could be moved no more than about 0.3 mile north or 4.7 miles south of the proposed location. Locations to the north would also be within wetland habitat for the bog turtle and would result in the BAV being closer to residences, as compared to the proposed location. Therefore, no alternatives to the north were considered further.

The BAV could be as far south as MP 9.8; however, the Chester Creek BAV is at MP 9.5; therefore, Adelphia determined that for optimal operation, alternatives for the Paoli Pike BAV would be between the existing location (at MP 14.5) and MP 13.0.⁴⁹ We evaluated four alternative locations for the Paoli Pike BAV based on criteria such as being at least 300 feet from wetlands and waterbodies to avoid potential impacts on bog turtles and close proximity to existing access roads (see figure 10).

⁴⁹ Per 49 CFR 192.179 a blowdown valve is required between each MLV and have capacity to release the natural gas as rapidly as practicable.

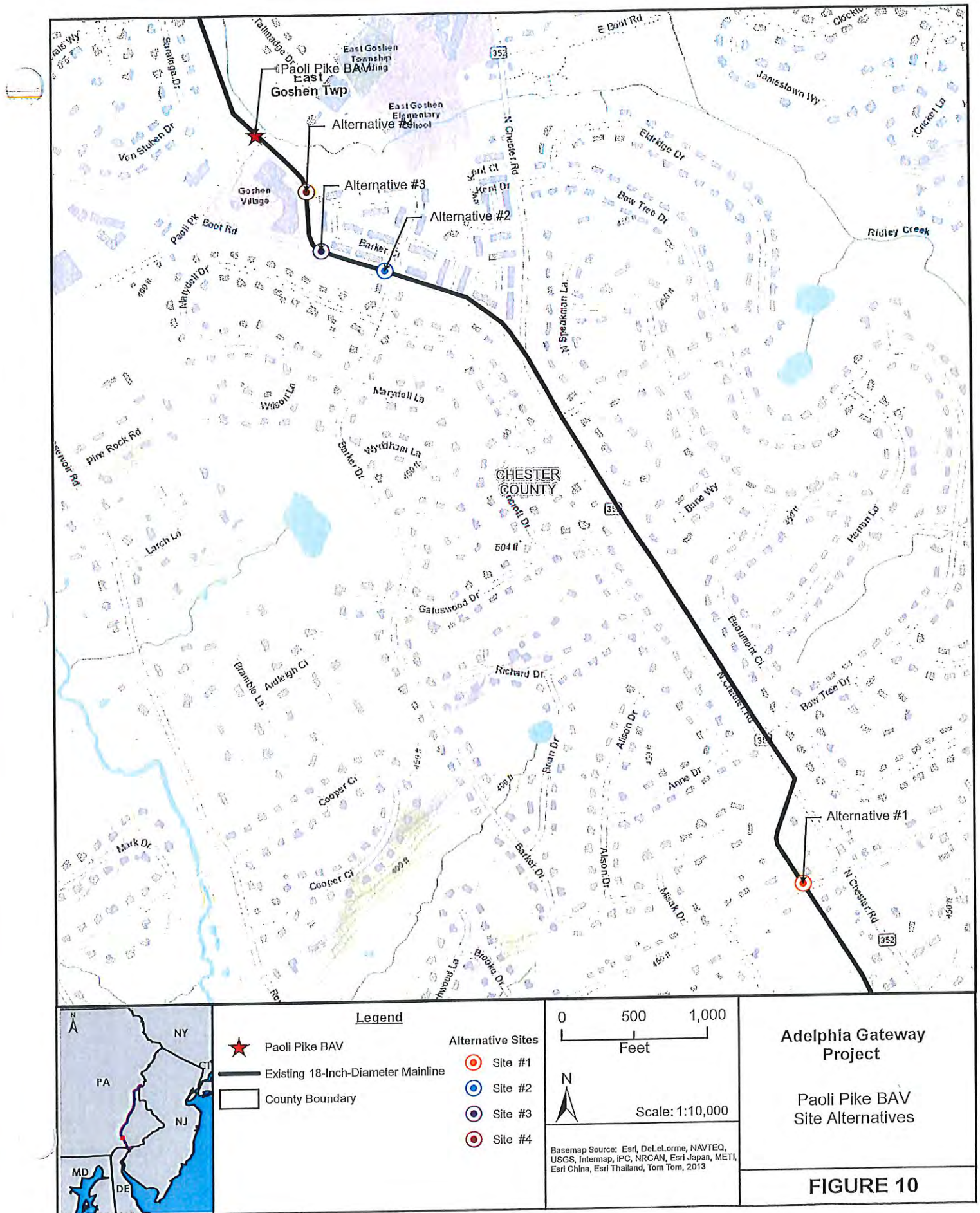
The area south of the Paoli Pike BAV is densely developed by residential property. Each alternative is closer in proximity (ranging from 65 to 175 feet) to more residences, as compared to the proposed site, which would be 357 feet from the closest residence. While all of alternative sites to the south would avoid impacts on wetlands, construction activities at the existing site would still occur to remove the existing valve, which would result in similar temporary impacts as those required to install the Paoli Pike BAV at the proposed location. While the alternatives would avoid potential bog turtle habitat, to construct one of the alternatives, the amount of land disturbance would be doubled (as Adelphia would remove the existing facility and install the BAV at an alternative location) and the alternatives would be closer to residences. For these reasons, we conclude that the alternative sites do not provide a significant environmental advantage over the proposed Paoli Pike BAV site.

Perkiomen Creek BAV Alternatives

We evaluated alternatives to the Perkiomen Creek BAV site in an effort to avoid impacts on a wetland, a nearby park, and township offices. To maintain compliance with USDOT-PHMSA regulations, Adelphia stated that the valve could be moved no further than about 1.4 miles north and 1.3 miles south of the proposed location. The two alternative sites identified within the optimal location to the north would be on land owned by Montgomery County and designated within Perkiomen Park (see figure 11). The two alternative sites to the south would be closer to residential properties as compared to the proposed site. As with Paoli Pike, choosing an alternative site would not preclude construction activities that would still be required at the existing facility site. As discussed further in section B.2.3, impacts on wetlands at the proposed BAV location would be temporary and limited to construction. Therefore, we conclude that the alternatives do not provide a significant environmental advantage over the proposed Perkiomen Creek BAV.

7. Conclusion

We reviewed alternatives to Adelphia's proposal based on our independent analysis. Although all of the system, variation, and aboveground facility alternatives we evaluated appear to be technically feasible, none provide a significant environmental advantage over the Project design. Therefore, we conclude that the proposed Project, as modified by our recommendations in section D of this EA, is the preferred alternative to meet Project objectives.



D. CONCLUSIONS AND RECOMMENDATIONS

Based on the analysis contained within this EA, we have determined that if Adelphia constructs and operates the proposed facilities in accordance with its application and supplements and our recommended mitigation measures, approval of this proposal would not constitute a major federal action significantly affecting the quality of the human environment. We recommend that the Order contain a finding of no significant impact and include the following mitigation measures listed below as conditions to any Certificate the Commission may issue.

1. Adelphia shall follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the EA, unless modified by the Order. Adelphia must:
 - a. request any modification to these procedures, measures, or conditions in a filing with the Secretary;
 - b. justify each modification relative to site-specific conditions;
 - c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
 - d. receive approval in writing from the Director of OEP **before using that modification.**
2. The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction and operation of the Project. This authority shall allow:
 - a. the modification of conditions of the Order;
 - b. stop work authority; and
 - c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from Project construction and operation.
3. **Prior to any construction**, Adelphia shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, EIs, and contractor personnel will be informed of the EIs' authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.

4. The authorized facility locations shall be as shown in the EA, as supplemented by filed alignment sheets. **As soon as they are available, and before the start of construction**, Adelphia shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

Adelphia's exercise of eminent domain authority granted under NGA Section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Adelphia's right of eminent domain granted under NGA Section 7(h) does not authorize it to increase the size of its natural gas pipeline or aboveground facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

5. Adelphia shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP **before construction in or near that area**.

This requirement does not apply to extra workspace allowed by the Commission's Plan, and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;
- b. implementation of endangered, threatened, or special concern species mitigation measures;
- c. recommendations by state regulatory authorities; and
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

6. **Within 60 days of the acceptance of the authorization and before construction begins**, Adelphia shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP. Adelphia must file revisions to the plan as schedules change. The plan shall identify:

- a. how Adelphia will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
- b. how Adelphia will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
- c. the number of EIs assigned per spread, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
- d. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
- e. the location and dates of the environmental compliance training and instructions Adelphia will give to all personnel involved with construction and restoration (initial and refresher training as the Project progresses and personnel change);
- f. the company personnel (if known) and specific portion of Adelphia's organization having responsibility for compliance;
- g. the procedures (including use of contract penalties) Adelphia will follow if noncompliance occurs; and
- h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:
 - (1) completion of all required surveys and reports;
 - (2) the environmental compliance training of onsite personnel;
 - (3) the start of construction; and
 - (4) the start and completion of restoration.

7. Adelphia shall employ at least two EIs. The EIs shall be:

- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
 - b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see Condition 6 above) and any other authorizing document;
 - c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
 - d. a full-time position, separate from all other activity inspectors;
 - e. responsible for documenting compliance with the environmental conditions of that Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
 - f. responsible for maintaining status reports.
8. Beginning with the filing of its Implementation Plan, Adelphia shall file updated status reports with the Secretary on a **biweekly** basis until all construction and restoration activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:
- a. an update on Adelphia's efforts to obtain the necessary federal authorizations;
 - b. the construction status of each spread, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally sensitive areas;
 - c. a listing of all problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
 - d. a description of the corrective actions implemented in response to all instances of noncompliance;
 - e. the effectiveness of all corrective actions implemented;
 - f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and

- g. copies of any correspondence received by Adelphia from other federal, state, or local permitting agencies concerning instances of noncompliance, and Adelphia's response.
9. Adelphia must receive written authorization from the Director of OEP **before commencing construction of any Project facilities**. To obtain such authorization, Adelphia must file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).
10. Adelphia must receive written authorization from the Director of OEP **before placing the Project into service**. Such authorization will only be granted following a determination that rehabilitation and restoration of the rights-of-way and other areas affected by the Project are proceeding satisfactorily.
11. **Within 30 days of placing the authorized facilities in service**, Adelphia shall file an affirmative statement with the Secretary, certified by a senior company official:
- a. that the facilities have been constructed and installed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
 - b. identifying which of the conditions in the Order Adelphia has complied with or will comply with. This statement shall also identify any areas affected by the Project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.
12. **Prior to construction**, Adelphia should file with the Secretary, for review and written approval by the Director of the OEP, a Karst Monitoring Plan for the Existing System. The plan shall include:
- a. frequency and duration of monitoring;
 - b. conditions requiring remedial action; and
 - c. the karst remediation measures Adelphia will implement along the Existing System.
13. **Prior to construction**, Adelphia shall file with the Secretary a final HDD feasibility assessment regarding the potential misalignment of the drilled hole through unconsolidated overburden/bedrock interface(s) along the HDD alignments. Adelphia shall also include in the assessment an evaluation of the potential for hydrofracture

and an inadvertent return using the U.S. Army Corps of Engineers' Delft method⁵⁰ (or an equivalent method) for drilling through unconsolidated material, and/or a qualitative analysis for an inadvertent return through bedrock utilizing rock quality designation values obtained from the bedrock cores.

14. **Prior to construction**, Adelphia shall file with the Secretary the Final SAP for the Parkway and Tilghman Laterals, including any USEPA and PADEP comments on the SAP, for review and written approval by the Director of OEP. The Final SAP shall include:

- a. a clear definition of the number of samples, depth of sample collection, and analysis for each sampling location;
- b. a commitment to plug and abandon borings/monitoring wells in accordance with state and federal guidelines;
- c. sampling every 100 feet near the PADEP contaminated sites listed in table B-3 of the EA and expanded analytical testing to include known contaminants;
- d. addition of PCBs to the SAP for soil and groundwater samples collected adjacent to the Metro Container Corporation site; and
- e. site-specific plans for construction in areas of contamination, based on USEPA and PADEP consultations that include:
 - (1) the extent of contamination in relation to construction work areas;
 - (2) description of the contamination plumes (i.e., migrating, stable), where available;
 - (3) identification of areas where Project construction (including HDDs) could create a preferential migration path for contamination; and
 - (4) proposed mitigation measures developed in consultation with the USEPA and PADEP.

15. **Prior to construction**, Adelphia shall file with the Secretary a revised IRCP, for review and written approval by the Director of OEP, which addresses containment and cleanup measures for inadvertent releases in areas of contamination.

16. **Prior to construction**, Adelphia shall file with the Secretary, for review and written approval by the Director of OEP, results of consultation with the PADEP and the

⁵⁰ *Recommended Guidelines for Installation of Pipelines beneath Levees using Horizontal Directional Drilling*, prepared for USACE, Kimberlie Staheli [et al.], April 1998.

Delaware County Conservation District to identify an alternative stormwater management configuration at the Transco Meter Station that would not result in impacts on nearby wetlands.

17. **Prior to construction**, Adelphia shall file with the Secretary, for review and written approval by the Director of OEP, site-specific justification for operational use of AR-33.97-01 for access to the Perkiomen Creek BAV, or identify an alternative access route for use during operation that avoids impacts on wetlands.
18. Adelphia shall **not begin construction** of the Project **until**:
 - a. FERC staff completes ESA Section 7 consultations with the USFWS; and
 - b. Adelphia has received written notification from the Director of OEP that construction and/or use of mitigation (including implementation of conservation measures) may begin.
19. **Prior to construction**, Adelphia shall confirm in a filing with the Secretary that it will install super silt fence barrier at the Schuylkill River BAV during the inactive period of the eastern red belly turtle (October 15 – April 15), and if this timing window cannot be met, then Adelphia will have a qualified biologist on-site to conduct a clearance survey prior to construction.
20. **Prior to construction**, Adelphia shall file with the Secretary, for review and written approval by the Director of OEP:
 - a. results of consultation with the applicable managing entity for the portion of the Schuylkill River Trail that will be impacted by construction and operation of the Schuylkill River BAV, generally between MPs 27.3 and 28.1 of the existing mainline, including copies of any correspondence; and
 - b. mitigation measures that Adelphia will implement during construction and operation, including signage for trail users.
21. **Prior to construction**, Adelphia shall file with the Secretary a copy of PADEP's CZMA determination for the Adelphia Gateway Project.
22. **Prior to construction**, Adelphia shall file with the Secretary, for review and written approval by the Director of OEP, site-specific visual screening plans for the Quakertown Compressor and Meter Stations, developed in consultation with West Rockhill Township, and the Delmarva Meter Station. The plans should include photo simulations of the resulting viewshed from the perspective of nearby visual receptors.
23. **Prior to construction**, Adelphia shall identify parking areas for construction workers at the Marcus Hook Compressor Station and for the two new laterals and associated

meter stations and file the information with the Secretary for review and written approval by the Director of OEP.

24. Adelphia shall **not begin construction** of facilities and/or use of staging, storage, or temporary work areas and new or to-be-improved access roads **until**:

- a. for Pennsylvania, Adelphia files with the Secretary remaining cultural resources survey reports(s); site evaluation report(s), as required; avoidance/treatment plan(s), as required; and comments on the cultural resources reports and plans from the Pennsylvania SHPO;
- b. for Delaware, Adelphia files with the Secretary the Delaware SHPO's comments on the visual screening plan for the Delmarva Meter Station;
- c. the ACHP is afforded an opportunity to comment if historic properties would be adversely affected; and
- d. FERC staff reviews and the Director of the OEP approves the cultural resources reports and plans, and notifies Adelphia in writing that treatment plans/mitigation measures (including archaeological data recovery) may be implemented and/or construction may proceed.

All materials filed with the Commission containing **location, character, and** ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "**CUI//PRIV - DO NOT RELEASE.**"

25. Adelphia shall file with the Secretary noise surveys for the Marcus Hook Compressor Station and Quakertown Compressor and Meter Stations **no later than 60 days** after placing the stations into service. If full power load condition noise surveys are not possible, Adelphia shall file an interim survey at the maximum possible power load **within 60 days** of placing the stations into service and file the full power load survey **within 6 months**. If the noise attributable to operation of all equipment at the station under interim or full power load conditions exceeds an L_{dn} of 55 dBA at any nearby NSA, Adelphia shall:

- a. file a report with the Secretary, for review and written approval by the Director of OEP, on what changes are needed;
- b. install additional noise controls to meet that level **within 1 year** of the in-service date; and
- c. confirm compliance with this requirement by filing a second full power load noise survey with the Secretary for review and written approval by the Director of OEP **no later than 60 days** after it installs the additional noise controls.

26. **Prior to construction** of the Delmarva Meter Station, Adelphia shall file with the Secretary, for review and written approval by the Director of OEP, a description of the specific noise mitigation measures it will install at the Delmarva Meter Station and the associated noise levels predicted for full flow/load condition operations.

27. Adelphia shall file with the Secretary noise surveys for the Transco, Monroe, Tilghman, and Delmarva Meter Stations **no later than 60 days** after placing the stations into service. If full flow/load condition noise surveys are not possible, Adelphia shall file an interim survey at the maximum possible power load **within 60 days** of placing the stations into service and file the full flow/load survey **within 6 months**. If the noise attributable to operation of all equipment at each meter station under interim or full power load conditions exceeds an L_{dn} of 55 dBA at any nearby NSA, Adelphia shall:

- a. file a report with the Secretary, for review and written approval by the Director of OEP, on what changes are needed;
- b. install additional noise controls to meet that level **within 1 year** of the in-service date; and
- c. confirm compliance with this requirement by filing a second full power load noise survey with the Secretary for review and written approval by the Director of OEP **no later than 60 days** after it installs the additional noise controls.

FYI

Rick Smith

From: 'FERC eSubscription' <eSubscription@ferc.gov>
Sent: Wednesday, December 19, 2018 3:46 PM
Subject: Comment on Filing submitted in FERC CP18-46-000 by Individual No Affiliation, et al.

On 12/19/2018, the following Filing was submitted to the Federal Energy Regulatory Commission (FERC), Washington D.C.:

Filer: Individual No Affiliation
Individual No Affiliation (as Agent)

Docket(s): CP18-46-000
Lead Applicant: Adelphia Gateway, LLC
Filing Type: Comment on Filing
Description: Comment of Rick Smith in Docket(s)/Project(s) CP18-46-000
Submission Date: 12/19/2018

To view the document for this Filing, click here
http://elibrary.FERC.gov/idmws/file_list.asp?accession_num=20181219-5130

To modify your subscriptions, click here: <https://ferconline.ferc.gov/eSubscription.aspx>

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or for phone support, call 866-208-3676.

20181219-5130(33301477).txt

Rick Smith, West Chester, PA.
Adelphia Gateway LLC
Docket CP18-46-000

In light of the concerns expressed by several of our Township residents I am writing to request that Adelphia be required to prepare an Environmental Impact Statement.
Rick Smith, East Goshen Township Manager