

February 1, 2019

VIA Efiling

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Docket No. CP18-46-000
Application of Adelpia Gateway, LLC for CPCN
Comments of East Goshen Township**

Dear Secretary Bose:

On January 4, 2019, the staff at the Federal Energy Regulatory Commission issued an Environmental Assessment for the Adelpia gateway Project.

Enclosed please find the comments of East Goshen Township to be included in the docket regarding the Paoli Pike Mainline Valve and Blowdown Valve Assembly located in East Goshen Township, Chester County.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/mam

Enclosure

Cc: Louis F. Smith, East Goshen Township [w/enc.]

Margaret A. Morris, Esquire

From: eFiling@ferc.gov
Sent: Friday, February 01, 2019 5:05 PM
To: Margaret A. Morris, Esquire; eFilingacceptance@ferc.gov
Subject: FERC Receipt of Filing in CP18-46-000

Confirmation of Receipt

This is to confirm receipt by the FERC Office of the Secretary of the following electronic submission:

- Submission ID: 959388
- Docket(s) No.: CP18-46-000
- Filed By: East Goshen Township
- Signed By: Margaret Morris
- Filing Desc: Comment of East Goshen Township under CP18-46-000.
- Submission Date/Time: 2/1/2019 5:03:12 PM -Projected Filed Date/Time: 2/4/2019 8:30:00 AM (Subject to Change based on OPM/FERC Closure)

Additional detail about your filing is available via the following link:

<https://ferconline.ferc.gov/SubmissionStatus.aspx?hashcode=ec9kfxib4C69wCi3bsoww>

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E-Mail: ferconlinesupport@ferc.gov <mailto:ferconlinesupport@ferc.gov> (do not send filings to this address) Voice Mail: 866-208-3676.

January 29, 2019

Docket Nos. CP18-46-000

CP18-46-001

East Goshen Township Comments on the Adelphia Environmental Assessment (EA)

The Paoli Pike Mainline Valve and Blowdown Valve Assembly are located in East Goshen Township, Chester County.

The following comments relate specifically to East Goshen Township:

1. We request a more detailed investigation of the impact on air quality at both of the compressor stations, and more specifically, at the blowdown valve assembly on Paoli Pike in East Goshen Township.

2. We have questions regarding Adelphia's usage of the blowdown valve assembly on Paoli Pike:

- What does the pre-planned maintenance involve?
- Would Adelphia notify the public before off-gassing?
- What is the decibel level when the blowdown valve assembly is activated?
- Will the blowdown valve assembly be activated from Adelphia's pipeline control center or will Adelphia personnel have to come to this location and operate the valve manually?
- How much gas would be evacuated during pre-planned maintenance activities?
- How much gas would be evacuated during an emergency?
- Will any activation of the blowdown valve assembly result in the methane in the immediate vicinity of the valve reaching its lower explosive level?

3. Section B8.2 of EA Adelphia states it will comply with local noise ordinances. Based on our experience with construction activities associated with Sunoco's Mariner East Project, a requirement to this effect should be added to Condition 25, 26, or 27, as appropriate. This would eliminate any confusion about this issue when construction commences.

4. East Goshen was required to adopt a Stormwater Management Ordinance pursuant to the 1972 Clean Water Act. Under this ordinance, Adelphia will need to obtain a stormwater permit from East Goshen Township. Accordingly, Condition 9 should be amended to require Adelphia to certify that they have all federal, state, and **local** permits (or evidence of waiver thereof) before commencing construction.

5. Adelphia should be required to purchase, install, and maintain leak detection and air quality monitoring at the blowdown valve assembly on Paoli Pike.

6. Conditions 7.e and 8.c require that the environmental inspectors and Adelphia

document any instances of noncompliance with permit requirements imposed by other federal, state, or **local agencies** (emphasis added). Condition 8 should be amended to require that the bi-weekly status reports be provided to the local agencies that have issued permits to Adelphia.

7. In Section B9.6 of EA, it is noted that Adelphia is required to develop an Emergency Response Plan. A new condition should be added requiring that a copy of the Emergency Response Plan should be provided to all of the local emergency service providers, especially in those municipalities that have a mainline valve, blowdown valve assembly, metering station, or compressor station.

The following comments are relative to broader aspects of the project that are not specific to East Goshen Township:

8. The EA is not adequate to assess the impact to our community. We urge FERC to complete an Environmental Impact Study (EIS) to provide a more detailed analysis and understanding of the Adelphia Project's impact to the environment.

9. The EA notes that there is no significant impact on the environment from HDD. We know firsthand that this is not accurate, from both our township's experience and the larger community's experience with HDD on the Mariner East project. (Reference: <https://www.dep.pa.gov/Business/ProgramIntegration/Pennsylvania-Pipeline-Portal/Pages/Mariner-East-II.aspx>)

10. We urge FERC to require Adelphia to issue a publicly-available risk assessment.

11. In Section B8.1 of EA, Adelphia states it intends to participate in the USEPA Natural Gas Star Program. A new condition should be added requiring Adelphia to participate in this program.

12. Condition 11 should be modified to require that this statement be filed before the authorized facilities are placed in service. This will allow the Director of OEP to know whether or not the facilities have been constructed and installed in accordance with the applicable conditions before authorizing those facilities to be placed in service, pursuant to Condition 10.