

**East Goshen Township  
Pipeline Task Force  
Meeting Agenda**  
Thursday, September 26, 2019  
5:00 PM

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. August 22, 2019
6. Public Comment
7. Chairman's Report
8. Reports
  - a. Legislative Update
  - b. Current Pipeline Events Impacting East Goshen
9. Old Business
  - a. Review Pipeline legislation - Bills: 40, 257, 259, 261, 262
  - b. Discuss ABC 2020 Budget Request
  - c. Discuss Emergency Plan
10. New Business
  - a. Chester County Environmental Alliance (<https://chescoenvt.org/>)
11. Correspondence
  - a. Sunoco Response to DEP comments – Exton Bypass
  - b. Accufacts Report on 8-5-19 "Event" at Boot Road Pump station
12. Adjournment

**PIPELINE TASK FORCE WORKSHOP MEETING  
1580 PAOLI PIKE  
THURSDAY, August 22, 2019  
DRAFT MINUTES**

**Present:** Members: Judi DiFonzo, Karen Miller, Christina Morley, Gerald Sexton;  
Rick Smith, Township Manager

**Call to Order & Pledge of Allegiance**

Gerry called the meeting to order at 5:00 p.m. and led the pledge of allegiance.

**Moment of Silence**

Gerry called for a moment of silence to honor our first responders, those that have served in the military and those that lost their lives for the country.

**Recording**

Gerry asked if anyone was recording the meeting. No one was recording.

**Approval of Minutes**

The minutes from August 8, 2019, were unanimously approved as amended.

**Public Comment**

1. Mary Jean Naftzger, 439 Gateswood Drive, raised the subject of the current Sunoco television ads. She stated that these ads show a happy homeowner's story. She questioned how her side of the story could be advertised or presented to the press. Christina advised Mary Jean to reach out to community groups on social media. Gerry asked for an action item to refer to Caroline for input to this topic for Mary Jean.
2. Brian Sweet, 646 Meadow Drive, stated that he attended the Governor Wolf visit to the pipeline site (today) at the Giant Shopping Center – Village Square in East Goshen. Brian stated that the Governor was asked if he was to going to stop ME construction, and he replied, "No".
3. Karen Payne, 1428 Linden Lane, ask about how long the construction was going to last. Rick explained that Sunoco states that construction will be done by the end of 2020. Sunoco is obligated to also plant grass and reshape the ground. She asked about trees currently being removed on Boot Road. Rick explained this was not Sunoco and possibly work being done by PennDOT. Karen also asked if there is any evidence about declining home values due to the pipeline. Rick stated that there is no evidence.
4. Bob Walentis, 1428 Linden Lane, asked about the judge's ruling against continuing Sunoco construction. Rick explained that this did not pertain to East Goshen.
5. Chuck Danneburg, 1713 Towne Drive, thanked the Task Force (TF) for their efforts. He asked for everyone to introduce themselves.

1  
2 **Chairman's Report/Legislative Update/Current Events**

- 3 1. Gerry reported that at the Board of Supervisors (BOS) meeting on August 20, the  
4 comments submitted by the TF were approved. Rick stated the comments were  
5 mailed (postal) to the PUC on August 21. These comments will be posted on the  
6 website. The Chester County Association of Township Official's comments will  
7 also be posted to the website.  
8  
9 2. Christina stated that the joint comments submitted from Goshen United for  
10 Public Safety and Del-Chesco United for Pipeline Safety were extremely well-  
11 written and thought out. Gerry asked if a link to the PUC website for comment  
12 can be put on the Township website. Susan will add on Friday (8/24).  
13  
14 3. Rick and Christina mentioned that the Monday, August 21<sup>st</sup> Daily Local News  
15 stated that the investigation to the "loud boom" at the Boot Road pumping  
16 station was opened, reviewed and closed with no further explanation. Follow up  
17 regarding this incident, including next steps, will discussed at the next TF  
18 meeting.  
19  
20 4. Gerry reported that Caroline will share information about a meeting she  
21 attended on Tuesday, 8/20 with State Representative Carolyn Comitta.  
22  
23 5. Gerry stated a letter from the Township regarding a request from Sunoco to  
24 work around the clock instead of 7 am to 10 pm was mailed out to all residents.  
25 Rick explained a separate letter and were mailed to those residents that will be  
26 directly impacted (500 feet of drilling site). The survey requesting their feedback  
27 is due to the Township on September 12. There will be a public meeting on  
28 September 19, 2019, at 7 pm at Fugett Middle School. Gerry encouraged all to  
29 attend. Rick clarified that Sunoco will be attending the meeting for questions and  
30 answers. The BOS will listen to public comment in the order:  
31 1) EGT residents directly impacted  
32 2) EGT residents  
33 3) If time permits - from non-EGT residents  
34  
35 Stephanie Henson, 167 Birchwood Drive, asked if the School District and UPS  
36 was informed. Rick stated that Dr. Scanlon was informed. Christina suggested  
37 that Dr. Scanlon and the school board should be invited to attend. She expressed  
38 concern that the drilling would coincide with the school calendar. Judi stated  
39 that this concern can be raised at the next school board meeting during public  
40 comment.  
41  
42 6. There was discussion regarding the letter sent from Dr. Samuel T. Ariaratnam to  
43 Rick supporting the 24x7 pullback. Christina asked Rick if he email Dr.  
44 Ariaratnam asking that in his 22 years of experience:  
45 a. How many projects proposed by Sunoco were in a high consequence  
46 areas (HCA) that were densely populated?

- b. How many HDD projects had the same geology that comprises of East Goshen Township?
  - c. What steps does he suggest to mitigate the noise, dust and vibration?
7. Rick explained that the BOS approval of working around the clock is contingent upon the 12 inch spacing between the pipes when installed. Gerry stated that for those who cannot attend the 9/19 meeting, send questions to Rick for Sunoco and the BOS to address.

#### **Old Business**

1. The TF agreed to table the review of the legislative bills. The TF members are to summarize their respective bills and email to the group.

#### **New Business**

1. **Consider a letter to the DEP sharing concerns regarding the direct Pipe Boring method as stated in the Exton Bypass Crossing Analysis** - The TF discussed the Exton Bypass Crossing Analysis. The public comment period for this item has passed (June 13). The TF agreed to review the analysis and provide comments in a google doc before the next TF meeting. Susan will set up google doc.
2. **Discuss ABC 2020 Budget Request** - The TF discussed the 2020 budget. There was discussion that this could be used for a professional ad for the newsletter, website or social media. Rick asked Susan to order name plates for the TF members. The TF members will discuss the budget item again at the next meeting. Christina asked if there could be a CPR training offered township wide. Rick will check with Jason Lang. There was discussion regarding inviting other Townships to attend the TF meetings.
3. **Discuss Emergency Plan** - The TF briefly discussed forming a working group to focus on an emergency plan. This working group could be comprised of members from the public and the Pipeline Task Force. Christina stated that the Chester County Commissioners are becoming more actively involved on safety regarding Mariner East. She stated that Michele Truitt is still interested in participating in a subcommittee or working group. Gerry asked to table this discussion until the next meeting when more TF members are present to participate.

The next meeting is Thursday, September 26, 2019, at 5:00 pm.

#### **Adjournment**

The meeting was adjourned at 7:05 pm.

Respectfully submitted,  
*Susan D'Amore*

*F:\Data\Shared Data\Minutes\Pipeline Task Force\2019\Pipeline TF Mins 08-22-19 DRAFT.docx*

September 17, 2019

Mr. John F. Hohenstein P.E.  
Environmental Program Manager  
Southeast Regional Office  
Pennsylvania Department of Environmental Protection;  
2 East Main Street  
Norristown, Pennsylvania 19401-4915

**Re: Response to DEP Comments for Hydrogeological HDD Re-Evaluation Report  
SPLP HDD No. S3-0400 Exton Bypass Crossing  
PADEP Section 105 Permit No.: E15-862  
West Whiteland Township, Chester County**

Dear Mr. Hohenstein,

On May 30, 2019, Sunoco Pipeline, L.P (SPLP) submitted for public review and comment a Re-Evaluation of the permitted Horizontal Direction Drill (HDD) and proposed replacement construction plans for a segment of the Mariner East II Pipeline Project (Mariner II) known as the Exton Bypass Crossing, S3-0400, as referenced above. SPLP received emailed comments from the Department dated August 13, 2019, requesting additional information concerning the Direct Pipe Bore replacement construction plan. Please accept this letter as a response to your request for further information. Below you will find your specific request bolded, followed by SPLP's response.

- 1. It is requested that Sunoco exhibits, in a figure, the location of the fill areas and where the Direct Pipe bore HDD will emerge from the surface. DEP would like to see that these fill areas remain undisturbed at depth.**

The attached Figure 1 has been enhanced to show the locations of the subsidence fill locations. As shown, neither the direct bore profile, nor the receiving pit intrudes into the fill locations.

- 2. DEP believes that a resistivity survey of the proposed Direct Pipe installation area should be performed to delineate fill areas which may have irregular, unpredictable morphologies at depth.**

The attached report prepared by Gannett Fleming/Quantum Geophysics presents and discusses the existing geophysics data and geotechnical data available at the Direct Bore location. The 16-Inch pipeline grout program completed occurs where the direct pipe will exit and the open cut starts. It lies at a subsurface horizon from approximately 70 foot below ground surface (bgs) and extends upward. The grouting terminates approximately at 15-20 foot bgs. Based on the latest profile design, the grouting zones occur below the anticipated elevations of the direct pipe and open cut activities.

**3. DEP believes contingencies should be developed should fill material from earthen collapses be encountered in borehole cuttings.**

The cuttings from the direct bore are collected at a mud recycling plant that is the same as the units used during a horizontal directional drill. All cuttings from the recycling plant are collected in a roll off box and disposed of at a licensed disposal facility.

**4. The ground surface along the entire length of the HDD-400, 16-inch FlexBor should be continuously monitored during all Direct Pipe boring and trenching activities in this area.**

Continuous monitoring of the Exton Bypass Direct Pipe Bore will be performed by Professional Geologists (PG), Environmental Inspectors, and Construction Inspectors and will include as necessary:

- Documenting the progress of the bore;
- Documenting the subsurface characteristics by examination of the cuttings on 5 foot intervals as the bore progresses;
- Fluid use, materials (water, bentonite), and
- Reconnaissance for any signs of inadvertent returns during boring.

Additionally, SPLP Inspection staff and the assigned PG will inspect the excavation of the Direct Bore receiving pit and continuing open trench towards the crossing of Lynntree Drive to observe the excavated areas for any sign of the previously placed flowable fill and grout to ensure that areas prone to collapse have been backfilled appropriately; document that the materials used are adequately dense, in place, to assure the structural integrity of the new 20-inch pipeline, and to document that no void spaces exist immediately adjacent to the new 20-inch pipeline and that it is safe for construction to proceed. Any detection of the grout backfill or injected grout material encountered will be reported to Pennsylvania Public Utility Commission and the Department.

SPLP submits that we have been, and are, in complete compliance with the agreed terms and analysis requirements of the Order, as agreed to by the Department, and that no further analysis is required for the Department to consent to SPLP's evaluation and negative conclusions for this permitted horizontal directional drill. SPLP therefore requests that the Department approve the Reevaluation Report for Exton Bypass Horizontal Directional Drill (S3-400) as soon as possible.

Sincerely,



Larry J. Gremminger, CWB  
Vice-President – Environmental, Health & Safety  
Energy Transfer Partners  
Mariner East 2 Pipeline Project





September 9, 2019

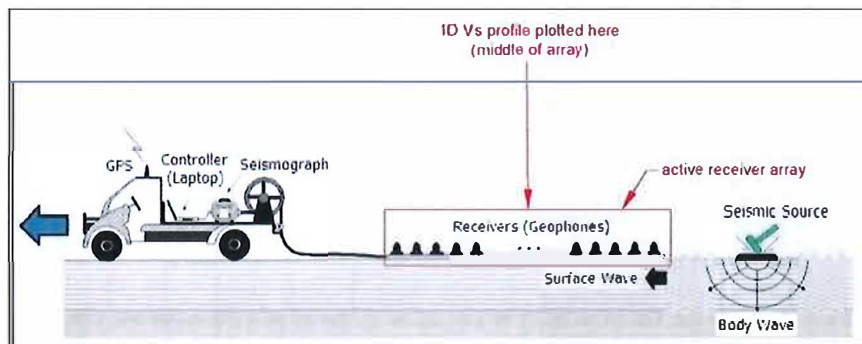
Larry Gremminger  
VP- Environmental  
ETP  
Larry.Gremminger@energyTransfer.com  
979-270-9131

Re: Letter Report  
HDD400  
Direct Push  
Exton, Pennsylvania

Dear Mr. Gremminger:

As requested, we laid-in the MASW-derived  $V_s$  profiles from our September 25-28, 2017 geophysical investigation onto the HDD400 direct push plan sheet and profile recently provided by Tetra Tech (see attached). The profiles show a 2-layer case of soil and rock. The rock is most likely weathered. Top of rock is interpreted and may actually be deeper near the entry pit as suggested by Geotech Boring SB-1. The boring is located 50 +/- ft to the east and was terminated at 30 ft bgs without encountering rock.

The  $V_s$  profiles appear "shorter" than the section being investigated and that is because of how MASW works and site conditions. Once an active receiver array is laid-out, a shot record is obtained and that shot record is inverted into a 1D  $V_s$  profile. The 1D  $V_s$  profile is plotted in the middle of the active array (illustrated below) because it is assumed that the profile is representative of subsurface conditions beneath the active array.



*Adapted from WWW.MASW.com.*

29 Richard Lee Lane, Phoenixville, PA 19460  
610-917-1900 (office)



Gremminger, L.  
ETP  
Page 2

Additional shot records are collected at a predetermined interval as the array is moved progressively along a survey line. The 1D  $V_s$  profile from each shot record is plotted in the middle of each respective active receiver array location. Interpolation of the 1D  $V_s$  profiles produces a 2D  $V_s$  profile along the survey line.

The  $V_s$  profiles are “short” in the plan and profile drawing because obstructions such as fencing, staged materials, drilling operations, heavy equipment, the US 30 By-Pass, and railroad ROWs prevented laying-out the active receiver array before the start of a section and extending the array past the end of each section.

It is our understanding that DEP is requesting the use of the electrical resistivity method to identify subsurface conditions. While electrical resistivity would provide better spatial coverage than MASW, the electrical resistivity method is susceptible to interference from buried metal, including the existing 8" and 12" pipelines in the ROW. Buried metal impacts electrical resistivity data because it attracts electrical current. Crossing a pipe with an electrical resistivity line is known to cause an anomaly that looks much like that caused by a fracture or shear zone. It's not real, an “artifact” that can also mask the response of real features (e.g., voids). Running near and parallel to a pipe represents a worst-case scenario because the pipe can make top of rock look deeper than it really is, and mask features the full length of the profile.

The attached “white-paper” by AGI (Advanced Geosciences, Inc.) offers guidance in how to avoid interference from buried metal, including pipes. AGI is the manufacturer of the SuperSting earth resistivity system which we (and others) have used on ETP HDD sites. The max depth of the direct push path is 48 ft bgs. This would require laying-out a 240-foot long electrical resistivity line (max. depth of exploration is approximately 20% the length of the electrical resistivity line) and the line would have to be offset at least 48 ft from existing pipelines. Not only would this put the offset outside the ROW, but subsurface conditions identified along the offset may not necessarily be representative of conditions along the direct push path.

Please let me know if there are any questions or comments.

Sincerely,

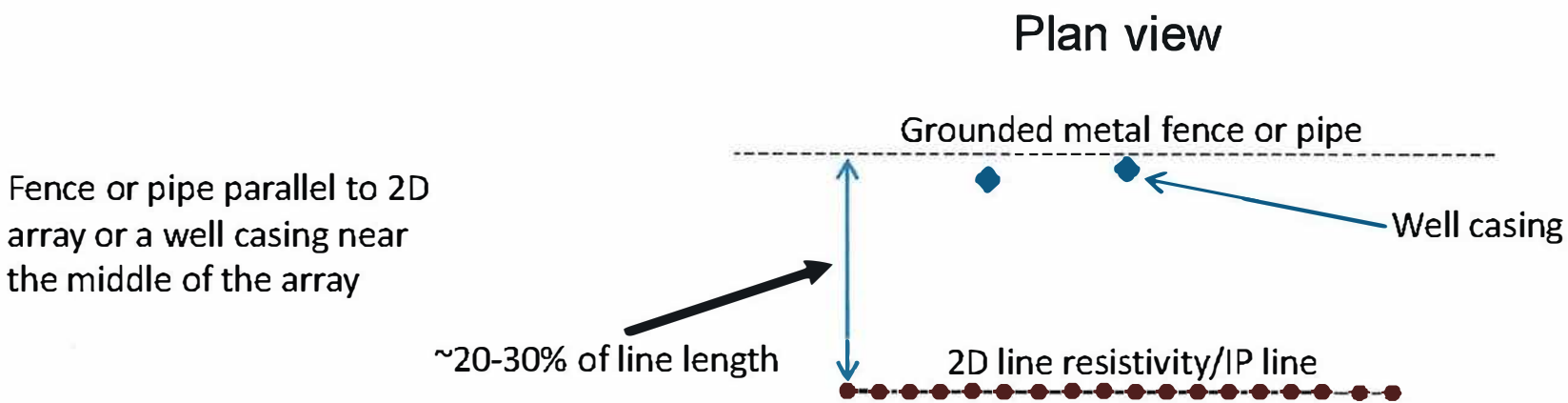
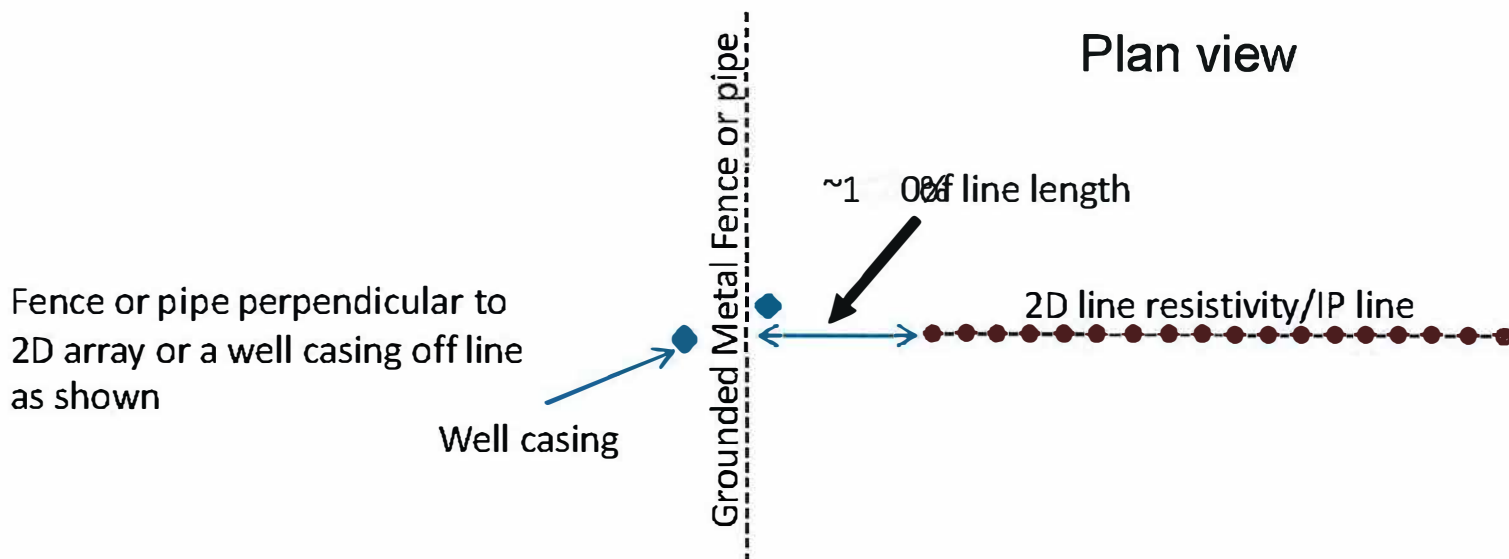
**Quantum** Geophysics



Richard Lee, P.G., R.GP.  
President and Principal Geophysicist  
RKL/jas



# Avoiding influence of buried metallic objects





# **Accufacts Inc.**

“Clear Knowledge in the Over Information Age”

8151 164<sup>th</sup> Ave NE  
Redmond, WA 98052  
Ph (425) 802-1200  
kuprewicz@comcast.net

**Date: September 16, 2019**

**To: Mr. Casey LaLonde  
Township Manager  
West Goshen Township  
1025 Paoli Pike  
West Chester, PA 19380-4699**

**Re: Accufacts Report on the episode on the evening of 8-5-19 at the Mariner East Boot Road Pump Station (“Event”), Boot Road, West Goshen Township, PA**

## **Introduction**

Accufacts Inc. (“Accufacts”) was asked by West Goshen Township to provide an independent review of the Event involving the flare at the Boot Road Pump Station (“PS”). The pump station operates as part of the 8-inch Mariner East (“ME”) 1 pipeline transporting hazardous volatile liquids, or HVLs, from the Marcellus Shale Region of Pennsylvania to Marcus Hook, Pennsylvania. This Report is based on documents and other information provided by Sunoco Pipelines Limited Partnership (“SPLP”) under a Nondisclosure Agreement (“NDA”) with SPLP. The NDA prevents disclosure of certain proprietary information but does not preclude Accufacts from forming its own independent conclusions based on many years of operating experience, including investigating numerous incidents involving explosions.

The Event, experienced as a loud noise and resulting in nearby resident windows and homes shaking, was a backfire, a type of minor explosion, involving the PS flare. Based on the available information and testimonials of the Event, this backfire produced no damage to the PS nor to nearby homes. Backfires, however, should be avoided, because as a form of explosion their consequences can be unpredictable. The Event, based on my experience and knowledge of applicable Commonwealth and federal laws and regulations, was not reportable. After a careful review of the documents including PS Piping and Instrument Diagrams (“P&ID’s”), a video of the Event, and detailed discussions with SPLP, I make the following four key observations.

**1. The PS flare safety equipment worked as designed.**

Various levels of flare safety equipment designed into the PS operation worked as expected. It is worth noting that the PS flare was placed into initial service in late 2014 and has operated since then without incident. Following maintenance activities placing a segment of PS new piping into propane service, a propane/nitrogen sweep in part of the station piping vented mixed propane/nitrogen gas to the flare, causing a flare pilot “flame out” from lack of sufficient oxygen.<sup>1</sup> Nitrogen is noncombustible, even when mixed with certain amounts of propane. The flare system is designed to go into a rapid series of reignition sequence attempts to relight the pilot, should the pilot go out. After a limited number of reignition attempts, if the pilot does not relight within so many seconds, fuel to the pilot and hydrocarbon supply to the flare are automatically shut off. During the reignition sequence, the relighting of the pilot eventually resulted in the combustion of residual gas within the flare resulting in the “backfire.” The backfire was caused by too much purge nitrogen/propane mix within the flare before sufficient oxygen mix could be established.

This unusual and rare situation can be avoided by reducing the rate of nitrogen to the flare during maintenance pipe purging, or by shutting off hydrocarbon supplies to the flare while delaying the flare reignition relight sequence to permit sufficient oxygen mix to return to the flare. SPLP has instituted additional PS maintenance procedures to avoid snuffing out the flare pilot in the future with nitrogen.

**2. A “backfire” is a type of minor explosion that should be avoided in prudent operations.**

In reigniting the flare pilot, a minor explosion occurred within the flare which could be heard and felt by some nearby neighbors. Explosions, in simple terms, occur when hydrocarbon combustion energy is converted to mechanical energy under certain circumstances and environments. For hydrocarbons, explosions are a specialized form of combustion that span a wide spectrum of forces and consequences. While it is accurate to characterize this Event as a “backfire,” such incidents should be avoided. Due to the inability to reliably predict explosion impacts, my experience indicates that any explosion potential, even backfires, should be avoided through a prudent combination of equipment design as well as operation and maintenance procedures. The flare is intended to be a safety device to prudently burn off certain minor HVL gases produced at the PS during operation and maintenance activities that might otherwise be released to the atmosphere.

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<sup>1</sup> To prevent a possible explosive atmosphere within the pipe, inert nitrogen is often utilized in new pipe station piping to test as well as displace oxygen before hydrocarbon is introduced and in this case the hydrocarbon was propane used to displace the nitrogen.



**3. The experiences reported by some residents near the PS suggest atmospheric overpressure was also generated that went beyond the flare and pump station.**

Residents near the pump station reported the smell of hydrocarbons and houses shaking and windows rattling during the Event, which suggests an atmospheric overpressure, not just a noise, event. The atmospheric overpressure generated in the Event appears relatively minor since, based on the documents, the videos and testimonials, no pump station equipment, including the flare, was damaged, nor was there damage to nearby residences. The Event, however, understandably received Township and public attention and both are justified in raising many questions to understand the difference between a backfire and a serious explosion with blast potential.

**4. The Event was not a major HVL release explosion or blast.**

The forces generated from the Event are on the low end of a wide spectrum of possible explosion forces and atmospheric overpressure outcomes from hydrocarbon combustion. Such combustion forces are dependent on many factors, such as the type of hydrocarbon, its release rate and actual release amount, ignition delay, and terrain/location factors. It is inaccurate to characterize the Event as similar to a major pipeline release. After a careful review of Commonwealth and federal reporting requirements, in my opinion, the Event was not reportable to the National Response Center (“NRC”), the Pipeline and Hazardous Materials Safety Administration (“PHMSA”), the Pennsylvania Public Utility Commission nor the Pennsylvania Department of Environmental Protection, considering the source, cause and amount of gas release for this unusual incident.<sup>2</sup> It is recommended, if a similar Event happens in the future, that SPLP immediately notify the Township Police, and appropriate Commonwealth and County officials responsible for emergency response.

**Conclusion**

Based on the detailed information provided me, I conclude that the Event was preventable and should be avoided in the future. The Event was caused by an operator/maintenance error in routing too much propane/nitrogen to the flare while placing a segment of PS piping into hydrocarbon service. Modifications to the PS maintenance procedures should be implemented to prevent a reoccurrence. The incident did not rise to the level of triggering an emergency response, though I fully appreciate the Township’s and public concerns in this matter. SPLP should communicate directly to the Township and the public the actions they have taken to prevent a future occurrence.

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<sup>2</sup> See, 49CFR§195.50(a): Reporting accidents if there was a release of hazardous liquid.

A handwritten signature in blue ink, reading "Richard B. Kuprewicz". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard B. Kuprewicz,  
President,  
Accufacts Inc.

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 North Street, Harrisburg, Pennsylvania 17120

This Secretarial Letter is issued pursuant to the Commonwealth Court's Order of September 9, 2019. **THEREFORE,**

**IT IS ORDERED:**

- 1) That the Commission's interim emergency injunction contained in the Commission's June 15, 2018 Order is dissolved;
- 2) That the Complaint of Andover Homeowners' Association, Inc. against Sunoco Pipeline, L.P. at C-2018-3003605, which was consolidated with Docket Numbers C-2018-3001451 and P-2018-3001453, is now bifurcated from these cases, and shall be returned to the Office of Administrative Law Judge for further proceedings.
- 3) That the Complaint and Petition for Interim Emergency Relief at Docket Numbers C-2018-3001451 and P-2018-3001453, respectively, are dismissed.
- 4) That Docket Numbers C-2018-3001451 and P-2018-3001453 are closed.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta", written in a cursive style.

Rosemary Chiavetta  
Secretary

cc: ALJ Elizabeth Barnes  
Renardo L. Hicks, Chief Counsel  
Robert F. Young, Deputy Chief Counsel  
Terrence J. Buda, Assistant Counsel