



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

P-2018-3000281

March 19, 2018

Catherine Ricardo, Township Manager
Township of Edgmont
1000 Gradyville Road
PO Box 267
Gradyville, PA 19069
(via first class mail and email to
sreiner@edgment.org)

Re: Sunoco Pipeline, L.P., Docket No. P-2018-3000281

Dear Ms. Ricardo:

I am responding to your letter of March 16, 2018 to Chairman Brown of the Pennsylvania Public Utility Commission (Commission). You are probably aware of the above captioned proceeding pending before the Commission which involves Sunoco Pipeline L.P.'s (Sunoco) Mariner East 1 pipeline (ME1). As your letter relates in part to ME1, I have asked the Secretary of the Commission to file your letter in the public file maintained in that docket. In addition, I am including this letter as a filing in that docket to cure the *ex parte* issues, if any, associated with your letter and this response. See 66 Pa.C.S. § 334(c). I am attaching your letter to this response for completeness.

The Commission conducts thorough regulatory oversight of all public utilities, including common carrier pipeline public utilities like Sunoco. In particular, the Bureau of Investigation and Enforcement's Pipeline Safety Section oversees safety issues in the construction, operation and maintenance of natural gas and hazardous liquids pipelines, including the Sunoco pipelines identified in your letter. Several of your bullet points fall within their purview. These points include, for example, the frequency of integrity testing and your concerns regarding construction practices affecting existing pipelines. Accordingly, I am referring your letter to the Pipeline Safety Section for investigation and to take whatever actions they believe are warranted. I will also provide your letter to other appropriate bureaus within the Commission.

Several issues in your letter fall outside the Commission's jurisdiction and are within the jurisdiction of the Department of Environmental Protection (DEP). These issues include, for example, the contamination issues, construction using horizontal directional drilling and your request that "Sunoco is ordered to postpone" construction near the "April 2015 incident" site.

Catherine Ricardo
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You indicated you provided a courtesy copy of your letter to DEP. I will take the liberty of forwarding this response to Domenic Rocco, Acting Environmental Program Manager at DEP, and request that he forward your letter to the appropriate departments within DEP. For your information, Mr. Rocco's contact information is:

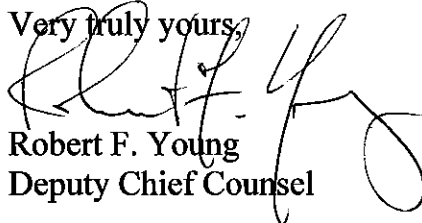
Domenic Rocco, P.E.
Acting Environmental Program Manager
Regional Permit Coordination Office
Department of Environmental Protection |
Rachel Carson State Office Building
400 Market St.
Harrisburg PA 17101
Phone: 484-868-2726
drocco@pa.gov

Should you wish to contact the Commission's Pipeline Safety Section directly, their contact information is:

Paul Metro,
Bureau of Investigation and Enforcement, Pipeline Safety Section
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265
pmetro@pa.gov
717-787-1063

Please contact me if you have any questions or need additional information.

Very truly yours,



Robert F. Young
Deputy Chief Counsel

Encl.

CC: Paul Metro, PUC Pipeline Safety
Domenic Rocco, P.E., DEP
Office of Attorney General
Hon. Christopher B. Quinn
Hon. Thomas H. Killion
Hon. Gladys M. Brown



TOWNSHIP OF EDGMONT

1000 Gradyville Road

PO Box 267

Gradyville, Pennsylvania 19039

610-459-1662 phone 610-459-3760 fax

March 16, 2018

Gladys M. Brown, Chairman
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
3rd Floor, Room N-304
Harrisburg, PA 17120

**Re: Sunoco ME 1 8" Pipeline for Propane, ethane, natural gas transmission
Sunoco Point Breeze-Montello 12" Pipeline for Gasoline, diesel fuel, kerosene,
home heating fuel transmission
Edgmont Township, Delaware County**

Dear Chairman Brown:


The purpose of this letter is to relay to the Pennsylvania Public Utility Commission some serious safety concerns of the Edgmont Township local elected and appointed officials on behalf of its residents living in the path of existing and proposed Sunoco pipelines. We would like to make the PUC aware of the following facts:

- Edgmont Township is a semi-rural community with approximately 250 single family residential dwellings on well water, in close proximity to the Sunoco existing and proposed pipelines.
- Public water supply is within several hundreds of feet of some of the homes in the area of the Sunoco pipelines, but no distribution lines extend into the area of the pipelines.
- In Edgmont Township, Sunoco currently operates a 12" pipeline to transmit Gasoline, diesel fuel, kerosene, home heating fuel which it calls 'Point Breeze-Montello' and an 8" pipeline to transmit propane, ethane and natural gas which it calls Mariner East 1.
- In Edgmont Township, Sunoco currently is undergoing the installation of two new transmission lines, at 16" and 20", proposed to carry liquid natural gas. The installation of these lines is well underway, with some sections of trench installation completed, and one of three HDD sites partially completed. The project is currently on hold for the 3rd time, while the PaDEP further investigates safety concerns.
- Edgmont Township is aware of at least three (3) Sunoco Pipeline 'incidents' resulting in soil and groundwater contamination; those being in 1988, 1992 and 2015.
- All of the 'incidents' which resulted in petroleum products leaking into the environment were discovered as a result of nearby residents smelling the product, not as a result of any integrity testing done by the pipeline operator.

- Sunoco reports to only testing the integrity of its pipelines every 3-5 years!
- Edgmont Township has only ever received testing, remediation and closure reporting on the 1988 incident, and has received no formal reporting related to the 1992 and 2015 incidents which resulted in petroleum product release into the environment.
- Edgmont Township residents in close proximity to the 1992 large release of petroleum product are still complaining of contaminated well water, and black stains on their sinks and appliances. One was recently hospitalized due to sickness she related to bad well water.
- Edgmont Township residents in close proximity to the existing 8" and 12" pipelines have witnessed and expressed serious safety concerns over construction practices employed by the subcontractors of Sunoco while operating heavy equipment on top of the existing *Mariner 1* - 8" and *Point Breeze* - 12" pipelines. Videos have been sent to officials showing huge track hoes sitting on top of dirt covering, or extremely near existing pipelines, smashing car sized rocks in dumpsters causing violent vibrations in the immediate vicinity of the operating, existing pipelines.
- Edgmont Township land owners who own property on which previous owners conveyed easements to Sunoco for pipeline installation are today being treated harshly by right-of-way agents intending to complete maintenance work on either the existing *ME 1* - 8" or the *Point Breeze* - 12" lines. Little or no notice or warning is given before heavy construction equipment and crew show up to work in old easement areas. Residents have expressed their feelings of no respect for privacy by Sunoco.
- **PRODUCT RELEASE & CONTAMINATION:** As a result of a product release in April 2015 from Sunoco's existing line(s), Edgmont officials just learned today of Sunoco's intent to remove approximately 1,000 tons of contaminated soils adjacent to wetlands at the headwaters of Edgmont Township's highest water quality stream tributary, The Rocky Run.
- Private well testing and monitoring well testing in the area of the April 2015 incident and resultant product release evidenced contamination of groundwater, well water, and soil was detected.
- Sunoco reports migration through soils and groundwater of contamination as a result of the April 2015 incident.
- Sunoco intends to complete an HDD drill installation of both 16" and 20" *Mariner East 2* pipeline sections immediately adjacent to the site of the April 2015 incident.
- Edgmont Township officials would prefer that Sunoco is ordered to postpone this segment of installation until such time as a completed Act 2 Process report has been completed, received and reviewed by the township relating to the April 2015 incident.

As a result of the above information, Edgmont Township elected and appointed officials, on behalf of the safety, health and welfare of its residents, requests the PaPUC to comprehensively evaluate the practices and procedures of Sunoco related to the frequency of testing existing pipelines, protection of existing pipelines while installing new infrastructure, and reporting on incidents resulting in contamination of soil, groundwater and drinking water supplies. Thank you.

Very truly yours,
EDGMONT TOWNSHIP BOARD OF SUPERVISORS

BY: 
Catherine Ricardo, Township Manager

cc: PaDEP
Office of Attorney General
State Representative Chris Quinn
State Senator Tom Killion