

Uwchlan Township

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September 3, 2019
Ms. Rosemary Chiavetta,
Secretary of PUC
400 North Street
Harrisburg, PA 17120

Re. Docket L-2019-3010267
Hazardous Liquid Public Utility Standards at 52 PA Code Chapter 59

As a member of the Board of Supervisors in Uwchlan Township, Chester County, which has a population of almost 19,000 residents, I would like to submit these comments for the record regarding Hazardous Liquid Public Utility Standards at 52 PA Code Chapter 59. Many pipelines traverse through the entire length of Uwchlan Township and many more are planned for the next 20 years. The population and needs of Pennsylvania in the early 1900s is vastly different than it is today and what will be in 2040. I commend the PUC for its intent to review existing regulations and to update for the year 2020 while also anticipating growth beyond 2020.

In his letter dated August 22, 2019, submitted to the PUC on behalf of East Goshen Township, Mr. Louis F. Smith, Jr. eloquently listed the concerns of East Goshen, concerns that Uwchlan Township shares. Uwchlan Township has the same dangerous, combustible, natural gas liquid flowing through the township as does East Goshen. These NGLs are the same as that which the Philadelphia Energy Solution refinery contained in its facility when the explosion occurred in the early morning of June 21, 2019.

With regard to the statement on page 11 of the East Goshen letter:

*“Suggest that if a pipeline operator is required to identify the private well owners with **XXX** feet of the proposed pipeline pursuant to some other permit requirement that they be required to send a certified letter to each property owner advising them of the project and of the need for the information concerning their well”*

I ask that the PUC require the pipeline operator to identify and notify private well owners within **600 feet** of the proposed pipeline.

Further, I ask that the PUC require that all pipelines to be used follow best practices recommended by PHMSA and the standards posed by the American Society for Testing and Materials (ASTM). These agencies are purposeful in making their recommendations. For the public's safety, all future construction of pipelines should adhere to their recommendations. It should not be the for-profit company's decision to decide whether they want to follow these recommendations. Their purpose is to maximize profits for their shareholders, even if it means putting the public at catastrophic risk. The PUC exists to ensure the public's safety. Following the industry's safety standards is one step towards ensuring public safety.

Thank you for taking the time to allow me to submit comments.

Regards,



Kim Doan, Ph.D.
Uwchlan Township Supervisor