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Re: Docket No. L-2019-3010267

To the PA-PUC on new rules for hazardous liquids pipelines:

PHMSA has codes for how pipelines are to be built. I have a different perspective on these. All building code are the "minimum requirements" for the way things must be built and PHMSA's pipeline codes are no exception. When you build a home, you also need to follow codes. In some areas - like those prone to hurricanes or earthquakes - the codes are different. Knowing there is a higher potential for a sort of storm that comes with very high winds and rain, there are requirements for extra strapping so roofs don't blow off leaving the interior of a home open for the storm to totally destroy it. There are things done in earthquake zones with having water heaters not rely on gravity to stay upright in addition to other extras in the construction code that mitigate damage to buildings and potential injuries. I'm not suggesting changing building codes when a home or other structure is located near a hazardous liquid pipeline like the homes in my neighborhood are. What I'm suggesting is that in order to place a pipeline like this close to a home, nursing/rehabilitation facility, library, shopping center - places where the population density is high (I believe this is defined as more than 500 people per square mile) - that the pipeline needs to be built in a way where it will have less propensity to leak and devastate an area.

I know that minimum code for pipelines is burying them 3 feet but my feeling is that in high population areas, they should be deeper if that will protect people. Corrosion is the enemy of pipelines. In Europe, they build double wall pipelines from stainless steel and that seems to mitigate the number of leaks. If there is a leak - strike that - when there is a leak and people need to evacuate, there are things that can help. Early detection & warning systems that allow more time to evacuate would be one. Education of the population is important. You can require that residents are educated by the utility and the utility has records of this. I've advocated for professional drivers to have education where they would know a leak if they saw one. In my area, we have UPS as well as school bus drivers who drive along where the pipeline is buried. I see these people as part of our early detection program. You can require the percentage of professionals and residents who need to be educated. It seems that municipalities do not have sufficient information on how to keep their populations safe in the event of a leak. You can require pipeline utilities assist the municipalities they co-exist with in developing realistic safety plans - similarly to how the Nuclear Regulatory Commission requires evacuation plans near nuclear power plants and works with communities. This is in everyone's best interest when all community members work together - corporations and individuals. Southeastern Pennsylvania is home to an innovative situation. Nowhere else is there an area where there is a pipeline - never mind multiple pipelines - that carry NGLs located this closely to a human population of this density. We need innovative ways to protect this population. More stringent requirements in the construction and education of people are a good places to start.

So many people and groups have made technical suggestions during the comment period. I would encourage you to look at them in the context of having higher safety standards in areas where there is a higher possibility of loss of human life...like the high population density area I am raising my family in in Chester County. When we moved here, a pipeline leak would have cause soil contamination given what

flowed through it. Now the product is different and the risk has changed but there have been no changes in construction standards. These need to change as well. We need you to help lower the risk to residents and others who are part of this community.

Sincerely,

Judi Di Fonzo