

To:
Public Utility Commission
Harrisburg, PA

From:
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1601 Harvey Rd.
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Comments on
Proposed rules for pipeline safety
Docket No. L-2019-3010267

Thank you for these proposed new regulations for pipeline safety.

Some of the recommendations are very good:

For example,

1. 59.135. Design requirements. "... in addition to providing external loads for earthquakes, vibration, and thermal expansion and contraction, a hazardous liquid public utility must account for anticipated external loads for landslides, sinkholes, subsidence, and other geotechnical hazards."

This is good.

2. Below is a solid changes/improvement:

-Provide geotechnical construction before, during, and after pipeline construction.

3. Another good one:

-Provide water supply testing to all well owners that reside within 1000 feet of pipelines.

Now, I would like to bring up other sections of the proposed regulations which need improvement.

1. 59.133. Accident reporting. "... after the release of a hazardous liquid [the operator] must provide immediate notice to the Pipeline Safety Section [of the PUC] and emergency responders. Notice must be provided at the earliest practicable moment and no later than one hour after confirmed discovery."

Needs improvement: Automatic leak detection and instant notification, and the addition of an odorant, are needed. An hour later is too late; people will already be killed, or properties destroyed, or both.

2. 59.136. Construction

"... no pipeline may be located under private dwellings, industrial buildings, and places of public assembly."
This is common sense.

Needs improvement: However, pipelines should not be as close to building as Mariner East is; in many places it is located just a few feet away from buildings, which is dangerous and should be a violation. See next item for more on this.

3. 59.136. Construction

"... a minimum of 12 inches between the outside of a pipe and any underground structure, including structures owned by the hazardous liquid public utility and foreign structures, without exception. "

Needs improvement: By having ME2 and ME2x within 4 inches of each other, Sunoco now increases the risk that an

explosion in one would trigger an explosion in the other. 12 inches is probably not sufficient spacing, but it would be far better than Sunoco's current practice.

4. 59.136. Construction

... a hazardous liquid public utility shall install valves based on a pipeline's proximity to schools, churches, hospitals, daycares, nursing facilities, commercial facilities, industrial facilities, sport complexes and public parks within the outermost area of the LFL. "

Needs improvement: Emergency shutoff valves should be placed a specific distance - like every 5 miles, with additional valves placed near homes, schools, and places of public assembly.

5. 59.139

Operation and maintenance. "... hazardous liquid public utilities [must] consult with emergency responders in developing and updating an emergency procedures manual. The manual must address (1) steps to inform emergency responders of the practices and procedures to be followed for providing them with information regarding the pipeline, (2) the development of a continuing education program for emergency responders and the affected public, and (3) table-top drills to be conducted twice a year and a response drill to be conducted annually to simulate a pipeline emergency."

Needs improvement: In above manual the PUC should require a plan that is actually feasible. Telling the public to "walk half a mile upwind" is not feasible.

6. 59.139

This section also requires a public awareness program that meets standards set by the American Petroleum Institute. For pipelines like Mariner East, it should require (but does not) the wording specified by the judge in the Safety 7 case: leaks from these lines "can cause property damage, personal injury, burns, asphyxiation, and death."

7. "a leak detection system must be designed as a robust, Real Time Transient Model..."

Needs improvement - The leak detection system described here is based on monitoring pressure changes. That has proven insufficient. It should be based on detecting the actual escaping gases in the pipeline right-of-way. The technology is available, but Sunoco balks at the cost.

If that type of system is not installed, then odorization should be required immediately, not in five years.

8. 59.141

Land agents. "... land agents [must] hold a valid Pennsylvania professional license as an attorney, real estate salesperson, real estate broker, professional engineer, professional land surveyor, or professional geologist during the performance of land agent work or services."

Needs improvement - Yes, good, keep this but but there is no penalty here for deceiving landowners or abuse of eminent domain and there should be.

9.

59.136 Construction

"A hazardous liquid public utility shall install vehicle barriers at an above-ground valve station adjacent to a roadway. The vehicle barriers must be designed and constructed to protect the above-ground valve station from the largest types of vehicles."

Needs Improvement: Above is very good, however it should be noted that Sunoco ignored requests to install vehicle barriers at the valve station along Dorlan Mill Road in Chester County, directly across from Shamona Creek School. They must be made to correct the situation just mentioned, and enforcement should be put in place for all future vehicle barriers.

I live in Delaware, but just 5 miles away from Marcus Hook, Pennsylvania, the endpoint of Mariner East I. If there is an explosion there, my house is in the evacuation zone. That's why I vehemently care about the pipeline, and its

regulations.

Please make amendments as per above. Thanks for considering my views.