



TOWNSHIP OF EDGMONT

1000 Gradyville Road, Newtown Square, PA 19073

610-459-1662 www.edgmont.org

May 13, 2022

RECEIVED

Pennsylvania Public Utility Commission
Attn: Secretary Rosemary Chiavetta
400 North Street
Harrisburg, PA 17120

MAY 16 2022

Independent Regulatory
Review Commission

Re: Edgmont Township Comments on Docket No. L-2019-3010267

Dear Secretary Chiavetta:

I am writing on behalf of the Edgmont Township Board of Supervisors and its residents with regard to the Pennsylvania Public Utility Commission's recent Notice of Proposed Rulemaking (NOPR). Edgmont Township is a semi-rural community with approximately 250 single family residential dwellings on well water in close proximity to active pipelines. As you may know, the Mariner East II pipeline construction took place in our Township starting in 2016. The construction of the ME 2 Pipeline has impacted public infrastructure and the lives of many residents in Edgmont Township, and we offer the following comments for the Commission's consideration:

§ 59.134. Accident reporting.

Edgmont Township is in support of Accident Reporting with the following recommendation: In addition to the required notification to the Commissions Pipeline Safety Section and Emergency Responders, hazardous liquid public utility companies should be required to report accidents to local municipalities, conservation districts, and abutting property owners in which accidents occur.

§ 59.135. Construction, operation and maintenance, and other reports.

Edgmont Township is in support of Construction, operation and maintenance, and other reports with the following recommendation: In addition to required notification to the Commissions Pipeline Safety Section, hazardous liquid public utility companies should be required to send notification of construction, and operation and maintenance activities to local emergency responders, municipalities, conservation districts, and abutting property owners in which these activities are to occur.

§ 59.138. Horizontal directional drilling and trenchless technology, or direct buried methodologies.

Edgmont Township would recommend the Commission take a more active role and interest in groundwater testing and reporting. Specifically, working with local



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municipalities in their findings and reporting of groundwater issues. Additionally, Edgmont would recommend the Commission advocate for the "affected public" and require a more rigorous well water testing program for those in close proximity to pipeline construction as to the "affected public" from bearing the burden of adverse well water effects.

§ 59.140. Operation and maintenance.

Edgmont Township is in support of operation and maintenance. Specifically, the Township supports standards for emergency procedure manuals, liaison activities with emergency responders, liaison activities with school administrators when a school building or facility is within 1,000 feet or within the LFL of a pipeline or pipeline facility, public awareness communications, line markers, inspections of pipeline rights-of-way, and leak detection and odorization. Additionally, Edgmont recommends hazardous liquid public utility companies be required to contribute funding to the development of emergency procedural manuals and emergency services training for public entities.

As a result of the construction of the Sunoco ME 2 Pipeline and the operation and maintenance of existing pipeline infrastructure throughout Edgmont Township over the years, Edgmont elected officials believe the PaPUC needs to require more stringent guidelines regarding hazardous liquid public utility companies to ensure the health, safety, and welfare of its residents. These companies need to be held accountable for their responsibility to report and remediate incidents resulting in contamination of soil, groundwater and drinking water; and exhaust every possible measure to ensure public safety. Additionally, these companies need to be required and held accountable for clear and timely communication with emergency responders, local municipalities, conservation districts, and the general public.

Sincerely,

EDGMONT TOWNSHIP BOARD OF SUPERVISORS

Submitted By: _____


Neil D. Vaughn, Township Manager

cc: PaDEP
Office of Attorney General
State Representative Chris Quinn
State Senator John Kane