

**Equitrans, L.P.  
Equitrans Expansion Project  
Docket No. CP16-13-000**

**Responses to Environmental Information Request  
Dated June 24, 2016**

**Federal Energy Regulatory Commission**

**General**

1. File copies of permit applications submitted by Equitrans to the Pittsburgh and Huntington Districts of the U.S. Army Corps of Engineers.

**Response:**

Attachment General-1a – Pennsylvania and Attachment General-1b – West Virginia are the permit applications submitted to the state agencies on October 27, 2015 and the US Army Corps of Engineers on November 25, 2015. The permit applications reflect the pipeline alignment that was being considered at that time. Since then, adjustments have been made to minimize impacts to resources. The applications will be updated during the 3<sup>rd</sup> Quarter of 2016 to reflect the latest alignment information.

Respondent: Stephanie Frazier  
Position: Supervisor Environmental Permitting  
Phone Number: 412-553-5798  
Date: July 13, 2016

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**General**

2. Provide an updated table 1.7-1 (permit table) with the current status of all required federal, state, and local government permit applications and approvals.

**Response:**

Table 1.7-1R, included as Attachment General-2, has been updated with the current status of all required federal, state, and local government permit applications and approvals.

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**General**

3. File a revision to Equitrans' *Spill Prevention Controls and Countermeasures Plan* that includes all project components (not just the Redhook Compressor Station).

**Response:**

Attachment General-3 includes three separate documents that act as the Preparedness, Prevention, and Contingency (PPC) Plan, the Spill Prevention, Control, and Countermeasure (SPCC) Plan and the Emergency Action Plan (EAP) for the Project. These Plans are for:

1. The Project area located within Allegheny and Washington Counties, Pennsylvania (H-318);
2. The Project area located within Greene County, Pennsylvania; and
3. The Project area located in West Virginia.

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**General**

4. File a revision to the *Pratt Compressor Station Modifications* figure provided as part of the alignment sheets dated April 20, 2016 to indicate which buildings/structures would be retained once the Pratt Compressor Station is decommissioned.

**Response:**

A revised Pratt Compressor Station alignment sheet providing the requested information is included in Attachment General-4 as Critical Energy Infrastructure Information.

Respondent: Jeremy Watts  
Position: Engineer III  
Phone Number: 412-553-5769  
Date: July 13, 2016

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**General**

5. Clarify if any hazardous materials would be removed from the Pratt Compressor Station during abandonment activities, and specify how those materials would be handled.

**Response:**

Hazardous materials will be handled in accordance with regulatory requirements of the State of Pennsylvania, the Resource Conservation and Recovery Act (RCRA), the Toxic Substance Control Act (TSCA) for PCBs, and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos, and they will be transferred by licensed haulers and follow the applicable United States Department of Transportation requirements for transportation of fluids and solids. The transportation and disposal (in licensed waste disposal facilities) will be documented by the use of bill of lading forms, non-hazardous waste manifests, or hazardous waste manifests.

During abandonment of the Pratt Compressor Station it is anticipated that the following hazardous materials would be removed and disposed:

- Oil (petroleum) contaminated soil
- Lead paint
- Asbestos (coal-tar wrap)
- Hydrocarbons in pipe
- Mercury meters
- PCB transformer

Lead paint, asbestos, pipeline fluids and a PCB transformer will be disposed of as known waste streams in accordance with the regulatory requirements mentioned above (Pennsylvania solid waste regulations, RCRA, TSCA, or NESHAP) and will not be stored on site once removed. Potentially contaminated soil and coal tar or asbestos wrapped pipe will be stored at Pratt while analyses are conducted to characterize the materials for determine proper waste disposal.

An unanticipated discovery of contamination plan is included as part of Attachment General-3.

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**Resource Report 2 – Water Use and Quality – Water Resources**

1. Provide the distance (feet) and direction between the pipelines and Source Water Protection Areas within 0.25-mile. In response to an agency comment, discuss whether Equitrans would agree to conduct pre- and post-construction water quality sampling of Source Water Protection Areas within 0.25-mile of the project facilities to insure that surface water drinking supplies are not impaired by construction.

**Response:**

Source water protection areas, as discussed in Section 2.2.2.3 of Resource Report 2, are entirely surface water supplies. Temporary work zones for the H-318 pipeline are located within the Source Water Protection Area (Zone A) for the PAWC Pittsburgh public water supply and the H-318 pipeline is located within 0.25 mile of Zone A. The Mobley and Webster compressor stations, and the H-319 pipeline, are located within the Sistersville Municipal Water Zone of Peripheral Concern and within the Pine Grove Water Zone of Critical Concern/Zone of Peripheral Concern. The Redhook and Pratt compressor stations and the M-80/H-158, H-305, and H-316 pipelines are all located within the Tri-County Joint Municipal Authority Source Water Protection Area (Zone B). As these Project components are all located within these zones, distance and direction information is not relevant.

Pre- and post-construction sampling of surface water public supplies is not proposed and does not ensure protection of surface water. The regulatory requirements for construction stormwater permitting, along with the FERC Plan and Procedures and measures specified in Resource Report 2 Section 2.2.6.3, would provide safeguards to prevent sediment runoff during pipeline construction. Any spills or releases of contaminants during construction into (or that might affect) surface water bodies would be subject to immediate protection measures (as specified in Sections 2.2.6.2 and 2.3.4.6 of RR2) that might include follow-up sampling activities as appropriate.

Implementation of the FERC Plan and Procedures, specifically with respect to construction time windows, erosion and sedimentation control, bank stabilization, and bank revegetation, will minimize short- and long-term impacts on the waterbodies crossed by or in the vicinity of the Project route and facilities. Equitrans will continue to consult with state agencies during the permitting process to identify additional site-specific mitigation measures. Implementation of the FERC Plan and Procedures would include monitoring of these procedures during construction to ensure surface waters are protected

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**Resource Report 2 – Water Use and Quality – Water Resources**

2. The FERC environmental staff does not agree with Equitrans' January 22, 2016 response to our December 29, 2015 Environmental Information Request (EIR) RR2 No. 5 regarding well yield testing. In order to establish baseline individual well production capacity and background (pre-construction) water yield, Equitrans should commit to performing short-term yield tests (specific capacity) for private and public water supply wells. These data should be collected and reported for each season prior to construction. File a plan outlining the procedures that Equitrans would follow for its pre-construction domestic water well testing. Note: for public utility sources, monitoring records of yield can be used instead of testing.

**Response:**

Equitrans will submit its response on July 18, 2016.

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**Resource Report 2 – Water Use and Quality – Water Resources**

3. Clarify if Equitrans has identified any public or private water supply wells, springs, swallets, and other domestic drinking water sources within 150 feet of its proposed facilities. If so, file a table listing the types of water supplies, milepost, distance and direction from facilities, and geologic occurrence.

**Response:**

Swallets are generally associated with Karst terrain. This Project does not cross karst terrain. No swallets were identified in the Project area.

Water well records were not available in the Project area from West Virginia State agency databases; water well records are available from a publically accessible database from the Pennsylvania Department of Conservation and Natural Resources (PADCNR) website. The attached table (Attachment 2-3) provides a list of wells (along with the distance from the nearest Project feature within a mile) from the PADCNR. There are only three wells identified within 150 feet of a Project feature. Two of the wells are domestic and one is listed as “unused”; and all three are located near the Redhook Compressor Station/ H-316 L/R Site. As stated in Resource Report 2, during Project construction, water resources located within 150 feet of the construction area will be staked and flagged for visibility, and surrounded with silt fence and safety fence. In addition, Equitrans will offer to conduct a pre-construction water quality evaluation of water resources (springs and wells) identified within 150 feet of the Project work area.

Locational data for springs in Pennsylvania and West Virginia are not available from public databases; and inquiries to state and county agencies (PADEP 2015a; WVDEP 2015) did not result in the identification of springs in the vicinity of the Project.

During a field visit to the Webster Interconnect site a private water well was identified at the following location: (Lat: 39.55243, Lon: -80.54527). Equitrans owns the property where the Webster Interconnect will be constructed and plans to cap and fill the well prior to construction.

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**Resource Report 2 – Water Use and Quality – Water Resources**

4. The FERC's Wetland and Waterbody Construction and Mitigation Procedures (Procedures) Section V.I.A.6 prohibits siting of aboveground facilities within a wetland. Clarify why table 2-B-1R states 0.002 acre of a PEM wetland would be permanently affected due to construction of the Redhook Compressor Station. Provide justification why this wetland cannot be avoided. If this wetland cannot be avoided Equitrans must request a modification to the FERC Procedures.

**Response:**

Wetland W-N1 is the PEM wetland identified in Table 2-B-1R as being permanently affected due to construction of the Redhook Compressor Station. While located within the boundaries of the Redhook Compressor Station site, this wetland will be avoided; therefore, a modification to the FERC Procedures is not required. Table 2-B-1R will be revised and provided in a future submittal.

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**Resource Report 3 – Vegetation and Wildlife**

1. Indicate whether Equitrans would agree to conduct invasive species monitoring within the maintained right-of-way and temporary workspaces for three years after initiation of service for the project.

**Response:**

Equitrans commits to monitoring revegetation in areas affected by Project construction and in response to landowner concerns of these areas for at least two growing seasons following construction as outlined in the FERC Plan.

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**Resource Report 3 – Vegetation and Wildlife**

2. Indicate whether Equitrans would agree to prohibit mowing and maintenance equipment to be moved from an area where invasive species have been encountered during operation of the project unless it is cleaned prior to moving.

**Response:**

Equitrans commits to cleaning the tracks, tires, and blades of equipment to remove excess soil and vegetation prior to movement of equipment out of known weed-infested areas during operation of the Project.

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**Resource Report 3 – Vegetation and Wildlife**

3. File results of plant surveys conducted in 2016 (or a schedule for when those surveys would be conducted and reports filed), and include the locations of invasive plant species observed during the surveys.

**Response:**

The large-project PNDI review identified six species of plants for which DCNR is requesting surveys. The table below identifies those species and their optimal survey time.

**Plant species for which surveys have been requested on the Equitrans Expansion Project in Allegheny, Washington, and Greene counties, Pennsylvania**

Common Name	Scientific Name	Optimal Survey Time	Project Portion		Plant Species Present During Survey
			H-318	H-316/ H158-M80	
Blue False-indigo	<i>Baptisia australis</i>	May to June	X		No
White Trout-lily	<i>Erythronium albidum</i>	April to May	X	X	No
Purple Rocket	<i>Iodanthus pinnatifidus</i>	May – June	X		No
Rock Skullcap	<i>Scutellaria saxatilis</i>	July – August	X	X	Survey not yet completed
Snow Trillium	<i>Trillium nivale</i>	March – April	X	X	No
Cranefly Orchid	<i>Tipularia discolor</i>	Spring, Fall, Winter		X	No <sup>1</sup>
Crepis Rattlesnake Root	<i>Prenanthes crepidinea</i>	May – June	X		Yes <sup>1,2</sup>

Notes:

1. Species covered by multiple visits and thus may still be detected.
2. Not a species requested by DCNR.

There are three separate plant surveys planned for the Project. Two have already been completed during the periods of April 4-9 and May 23 – 26. One final survey is planned for late July and, once that is completed, a report will be produced documenting the results of all three surveys and it will be submitted concurrently to DCNR and FERC in August 2016.

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**Resource Report 3 – Vegetation and Wildlife**

4. File the planned locations of equipment cleaning stations intended to prevent the spread of invasive species.

**Response:**

Equitrans does not have any planned locations for equipment cleaning stations.

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**Resource Report 7 – Soils**

1. Several discrepancies were found between the summary soil limitations impact table (tables 7.3-1R) and the associated detailed soil limitations impact tables for the pipelines, aboveground facilities, and ancillary facilities (Appendix 7A to 7C) as provided as part of Equitrans' April 20, 2016 response to the FERC's March 31, 2016 EIR. File revised soil limitations impact summary tables (tables 7.3-1R) as well as detailed soil limitations impact tables by map unit for all pipelines, ATWS, aboveground facilities, access roads, and yards separately (Appendix 7A to 7C). Tables should include:
  - a. temporary and permanent impacts on soils. Permanent impacts (from operation) cannot be larger than temporary impacts (from construction);
  - b. the county for each map unit listed in the soil tables; and
  - c. consistent impact acres to resolve all discrepancies between these tables.

**Response:**

Tables 7.3-1R and Appendix 7A to 7C have been revised and included as Attachment 7-1.

Respondent: Stephanie Frazier  
Position: Supervisor Environmental Permitting  
Phone Number: 412-553-5798  
Date: July 13, 2016