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PA Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Comments Re: Sunoco Pipeline's Modification Request for Installation Method Change at HDD S3-0400 Lisa Drive, West Whiteland Township, Chester County

Sunoco Pipeline has applied for a modification to their Chapter 102 and Chapter 105 permits to change the installation method for the 20-inch diameter pipeline between Laborer's Training Center and Exton Station townhome community in West Whiteland Township from a Horizontal Directional Drill (HDD) to a Direct Pipe Bore and open trench installation. Given that the 20" pipeline clearly is going to be constructed in West Whiteland Township and across the Commonwealth, if we could be assured that it could be constructed safely deep underground, as horizontal directional drilling allows, that would be our preference. However, the sinkholes caused by HDD installation of the 16" pipeline in this area leave little doubt that such assurances could not be given and therefore we understand the reason for Sunoco's application for a permit modification.

West Whiteland Township asked a pipeline consultant to comment on the safety of the proposed change to direct bore in such proximity to other active pipelines. Based on Sunoco's confirmation that they will field verify the previously determined location of the active pipelines and keep boring activities at least ten feet from those pipelines, the consultant concluded that direct pipe boring does not pose a safety risk. We ask that DEP (and the PUC) ensure that boring activities will stay at least ten feet from active pipelines.

Our community's experience with the sinkholes by Lisa Drive, as well as more general experience from several years of pipeline construction, raises other questions too:

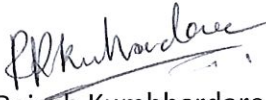
- What is the expected duration of construction for this segment? Anything that shortens the disruption to neighbors from construction, without impacting safety, is welcome at this point.
- Will the active 8" and 12" pipelines be exposed during construction? If so, we urge Sunoco to provide security during those periods to prevent risk of vandalism or accidents.
- Will the new pipes cross over the active 8" and 12" pipelines at any point? If so, we urge you to pay careful attention to the proposed method of excavation that will be employed when exposing the active pipes.
- Will any trees be removed from the pipeline right-of-way due to this modification? While we understand that trees will not be replanted in the permanent pipeline right-of-way, we encourage your diligence in requiring appropriate and adequate landscaping to restore screening for neighbors, as well as to provide environmental benefits.

- What kind of notifications will Sunoco be required to give to residents on Lisa Drive and Michele Drive and to the Lynetree Homeowners Association prior to the start of construction? Given the heightened concerns in these neighborhoods following the problems with installation of the 16" pipeline, we urge Sunoco to host a pre-construction meeting with nearby neighbors to provide an overview of the planned work, a work schedule and contact information for anyone who might have questions during installation of the 20" pipeline.
- Care should be taken to keep Lynetree Drive, a private road, open during construction.
- The 20" pipeline crosses the Township's sanitary sewer line at three locations within the modified section. Also, the 20" pipeline runs parallel and in close proximity to the section of the sanitary sewer line from Sta. 15187+00 to Sta. 15189+00. We ask that Sunoco coordinate closely with the Public Works Department to ensure the integrity of the sewer line.
- The Erosion and Sediment Control Plans, particularly drawing ES-6.50, do not include existing stormwater infrastructure (drainage pipes, curb inlets, basins, etc.) in the mapping. Sunoco should coordinate with the Township to identify the infrastructure and be prepared to implement stormwater BMP's such as inlet filter bags to minimized construction related stormwater from entering the systems.
- Will any additional geological testing be done during and after construction to verify the stability of the ground around the new and active pipelines? We ask that Township staff be briefed on the results of any geological testing that occurs.

Thank you for this opportunity to comment on the permit modification.

Sincerely,

West Whiteland Township
Board of Supervisors


Rajesh Kumbhardare
Chair


Theresa Santalucia
Vice-Chair


Joshua Anderson
Member

cc: Rob Horensky, PA Public Utility Commission – via email