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PA Department of Environmental Protection  
Southeast Regional Office  
Waterway and Wetlands Program  
2 East Main Street  
Norristown, Pennsylvania, 19401

**Re: Sunoco Pipeline L.P. Permit Modification Requests in West Whiteland Township**

Sunoco Pipeline L.P. has requested two permit modifications for work on the Pennsylvania Pipeline Project in West Whiteland Township:

- **Chapter 102 Permit No. ESG 01 000 15 001 Modification Request – E. Swedesford Road HDD S3-381**

This request is due to a change in the methodology from a single long horizontal directional drill (HDD) to an open cut with some shorter auger bores and a shorter HDD under Valley Creek and Lincoln Highway. This change in methodology is the result of concerns from Aqua America regarding their Hillside Drive production well. A permit modification is needed to allow a larger limit of disturbance to accommodate the revised installation technique, as well as the associated revised erosion and sediment controls.

- **Chapter 102 Permit No. ESG 01 000 15 001 Modification Request Two – N. Pottstown Pike HDD S3-0370**

This request is due to a change in the methodology from a single long HDD to a combination of open trenching and four conventional auger bores. A permit modification is needed to avoid geology which would make an HDD installation difficult.

West Whiteland Township has the following comments about the above referenced permit modifications:

- 1) The PA Public Utility Commission recently issued an order reinstating service on Sunoco's Mariner East 1 (ME1) pipeline, lifting an emergency order that suspended service after HDD installation apparently resulted in subsidence behind homes on Lisa Drive in West Whiteland Township. The PUC's order relied on the Bureau of Investigation and Enforcement Pipeline Safety Section's (BIE) concurrence with Sunoco's request for that action, which in turn relied on an evaluation conducted by BIE's geophysical consultant, ARM Group Inc. According to their report, ARM's concern that future HDD activities in the Lisa Drive area would likely result in additional subsidence features being formed and/or an expanded near ME1 was mitigated by Sunoco "changing the next pipeline installation in this area from an HDD installation to a trenching/direct burial installation."

West Whiteland's concern is that the change in installation from HDD that is at least implicitly required around Lisa Drive has not yet been evaluated in regards to the permit modifications referenced above. Pending confirmation of additional sections of the project to be converted

from HDD to an alternate form of construction, we ask DEP to withhold approval of permit modifications for the two sections currently under review so that the cumulative impact of all nearby work can be evaluated and proper planning and coordination can be ensured.

- 2) Should DEP authorize approval for trenching ME2 and ME2X as requested in these permit modifications, both pipelines should be installed concurrently – to the extent possible – rather than causing an additional round of environmental disturbance and making nearby residents endure additional construction disturbance at a later date.
- 3) The modification to the Swedesford Road section includes a short HDD under Lincoln Highway and Valley Creek. To minimize the disturbance to nearby residents, drilling operations – and the loud equipment that accompanies it – should take place from the south side on the Laborers Training Center property, rather than from the north side next to homes in the Meadowbrook Manor neighborhood.
- 4) The Meadowbrook Manor neighborhood is a charming older development with narrow, residential roads that were never intended to accommodate long-term truck use. To minimize the impact to the Meadowbrook Manor neighborhood, construction-related vehicles should be limited to accessing the work area from the parking lots of the Exton Square Mall and Chester County Library, rather than the roads of Meadowbrook Manor, except as absolutely necessary.
- 5) Meadowbrook Manor is prone to flooding and next to large commercial and institutional uses. The change to open trenching will increase the number of trees to be removed or cut back, with the potential to increase flood risk and reduce the existing buffer between the neighborhood and the adjacent mall and library activities. Care should be given to the time of year when trees are cut back to protect the health of those trees and compensatory plantings should be required for the trees to be removed.
- 6) In response to the heightened concern about the impact of these sections of ME2 and ME2X, we urge Sunoco to host a kickoff meeting with affected neighbors to provide an overview of the planned work, a work schedule and contact information for anyone who might have questions during construction.
- 7) Many people appreciated that DEP officials conducted the public hearing on April 30<sup>th</sup> for these permit modifications. Given the heightened interest and concerns about this project, if additional permit modifications are requested, we urge DEP to conduct public hearings for those matters as well.

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

Sincerely



Mimi Gleason

Township Manager