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2 **BEFORE THE**
3 **PENNSYLVANIA PUBLIC UTILITY COMMISSION**
4
5

6 Meghan Flynn : C-2018-3006116
7 Rosemary Fuller : P-2018-3006117
8 Michael Walsh :
9 Nancy Harkins :
10 Gerald McMullen :
11 Caroline Hughes and :
12 Melissa Haines :
13
14 Andover Homeowners Association : C-2018-3003605
15
16 Melissa DiBernardino : C-2018-3005025
17
18 Rebecca Britton : C-2019-3006898
19
20 Laura Obenski : C-2019-3006905
21 :
22 v. :
23 :
24 :
25 Sunoco Pipeline, L.P. :
26
27

28 **PREPARED DIRECT TESTIMONY OF**
29 **WILLIAM H. TURNER**
30 **ON BEHALF OF**
31 **CHESTER COUNTY**
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40
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42 **DATE SERVED:** January 15, 2020
43 **DATE ADMITTED:**

Chester County Statement No. 1

1
TURNER - 1

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.**

2 A. My name is William H. Turner and my business address is 601 Westtown Road, Suite
3 012, West Chester, PA 19380.

4
5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Chester County Department of Emergency Services (DES) as the
7 Deputy Director for Emergency Management.

8
9 **Q. HOW LONG HAVE YOU BEEN THE DEPUTY DIRECTOR FOR EMERGENCY
10 MANAGEMENT?**

11 A. I have been employed by DES since July 2011.

12
13 **Q. PLEASE DESCRIBE YOUR DUTIES AND RESPONSIBILITIES AS DEPUTY
14 DIRECTOR FOR DES.**

15 A. I am primarily responsible to ensure that the County has an emergency management
16 program that addresses planning, preparedness, prevention, mitigation, response and
17 recovery along with training for emergency-management coordinators and staff and
18 community outreach.

19
20 **Q. PLEASE BRIEFLY STATE YOUR EDUCATION BACKGROUND AND
21 EMPLOYMENT EXPERIENCE.**

22 A. In 2010 I received a BS in Business Management from West Chester University. I was
23 an EMT for Main Line Health from 2005 until I graduated from West Chester in 2010.

1 **Q. DO YOU HOLD ANY CERTIFICATIONS?**

2 A. Yes. I hold a Professional Level Certification from PEMA for Emergency Management.
3 This is the highest certification of the three levels. I also hold a certification for Business
4 Continuity Professional from the Disaster Recovery Institute International which requires
5 continued education courses annually. Finally, I am certified in continuity planning (i.e.
6 how to keep governmental and emergency service on in an emergency situation).

7

8 **Q. ARE YOU AUTHORIZED TO TESTIFY ON BEHALF OF CHESTER COUNTY**
9 **IN THIS PROCEEDING?**

10 A. Yes.

11

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A. I will provide an overview of Chester County's Emergency Operations Plan (EOP) and
14 offer recommendations that Sunoco should implement to enhance public safety and
15 public education. The County strongly encourages Sunoco to become a better corporate
16 citizen and be transparent regarding the pipeline operations.

17

18 **Q. WHAT IS THE MISSION OF THE DEPARTMENT OF EMERGENCY**
19 **SERVICES?**

20 A. To promote and assist in providing safety and security to Chester County residents so
21 they can work, live and grow in a healthy and safe community. Collaboration with
22 pipeline operators whose facilities are located in the County is critical to accomplish our
23 mission.

1 Q. WHAT LEGISLATION GOVERNS THE COUNTY'S EMERGENCY
2 PREPAREDNESS?

3 A. The Pennsylvania Emergency Management Service Code, Title 35, requires that every
4 county and municipality in the Commonwealth have an EOP to protect the lives and
5 property of the citizens of the county and municipalities as well as its visitors.
6

7 Q. WHAT ADMINISTRATIVE AGENCY HAS JURISDICTION OVER THE
8 COUNTY'S EOP?

9 A. PEMA, the Pennsylvania Emergency Management Agency.
10

11 Q. DOES THE COMMONWEALTH HAVE A STATE EMERGENCY
12 OPERATIONS PLAN?

13 A. Yes. It is called the *Pennsylvania State Emergency Operations Plan*.
14

15 Q. DOES THE COUNTY HAVE AN EMERGENCY OPERATIONS PLAN (EOP)?

16 A. Yes.
17

18 Q. DOES EACH MUNICIPALITY IN THE COUNTY HAVE AN EOP?

19 A. Yes.
20

21 Q. WHAT ROLE DOES THE COUNTY'S EOP SERVE IN RELATION TO THE
22 MUNICIPALITIES AND THE COMMONWEALTH EOP?

1 A. The County EOP serves as a bridge between the county's and municipal EOPs and the
2 *Pennsylvania State Emergency Operations Plan.*

3

4 **Q. WHAT IS THE GOAL OF A SUCCESSFUL EOP FOR ACTIVE PIPELINES**
5 **LOCATED IN CHESTER COUNTY?**

6 A. A plan where the operator timely notifies the County of any activity such as leak, routine
7 maintenance, training etc. so that the County can inform/warn the public in a timely
8 manner.

9

10 **Q. PLEASE DESCRIBE THE COUNTY'S EOP APPROACH.**

11 A. The County's EOP describes emergency response coordination procedures for Chester
12 County and reflects the structure of emergency management throughout the
13 Commonwealth of Pennsylvania and the United States. The structure is based on the
14 National Incident Management System (NIMS), which includes prescribed incident
15 command systems used by local emergency responders. The EOP serves as an emergency
16 management link between local municipalities and state government while incorporating
17 the federal organizational concepts of the National Response Framework. Organizations
18 and stakeholders representing individuals with disabilities and access and functional
19 needs are engaged in emergency management planning efforts in Chester County by DES
20 staff and partner departments.

21

22 The EOP employs a functional, all-hazards approach to define the assistance the county is
23 likely to need or provide during emergencies and disaster incidents. The approach is

1 aligned with 15 Emergency Support Functions (ESFs), which are used to define
2 responsibilities and tasks. In turn, the associated responsibilities and tasks are assigned to
3 specific positions in the Emergency Operations Center (EOC) but ESF positions are not
4 used in the Chester County EOC. As a consequence, one EOC position may be
5 responsible for functions and tasks from more than one ESF, allowing the EOC's flexible
6 structure to match staffing levels with actual demands.

7
8 The EOP is separated into three sections: (1) Basic Plan; (2) Position Annexes and (3)
9 Notification and Resource Manual.

10
11 **Q. PLEASE PROVIDE A SUCCINCT EXPLANATION OF THE BASIC PLAN.**

12 A. The Basic Plan presents the planning assumptions, policies, and the concept of
13 operations that guide the responsibilities for emergency coordination activities, including
14 prevention, protection, response, recovery and mitigation in Chester County. It contains
15 overarching structures and assigns responsibilities to various organizations.

16
17 **Q. PLEASE PROVIDE A SUCCINCT EXPLANATION OF POSITION ANNEXES.**

18 A. The Position Annexes describe the mission, concept of operations, and responsibilities of
19 each Emergency Operations Center (EOC) position. Each annex establishes position-
20 specific roles, responsibilities, and tasks, ensuring a clear understanding of each
21 position's purpose and duties. Each annex also includes position-specific job aids,
22 including functional checklists for initial, continuing, and demobilization operational
23 periods. The singular nature of each emergency does not allow these checklists to be fully

1 encompassing; however, they provide baseline tasks based on the specific duties of each
2 EOC position.

3
4 The annexes are organized according to the Chester County EOC organizational structure:
5 Policy Group, Command, Emergency Services Coordination Section, Planning/Situational
6 Awareness Section, Resource Support Section, and Human Services Coordination Section.

7
8 **Q. PLEASE PROVIDE A SUCCINCT EXPLANATION OF NOTIFICATION AND**
9 **RESOURCE MANUAL.**

10 A. The Notification and Resource Manual (NARM) contains lists of resources, facilities,
11 personnel, equipment, and supplies available to the county, along with contact
12 information to procure each resource for use during an emergency. Due to the regular
13 changes of resource and contact information, this information is maintained electronically
14 and not in hard copy format. The NARM is not subject to the Right-to-Know Law and is
15 not available to the public.

16
17 **Q. IS THE COUNTY PROPOSING ANY RECOMMENDATION THAT THE**
18 **COMMISSION DIRECT SUNOCO TO IMPLEMENT FOR THE MARINER**
19 **PIPELINE PROJECTS?**

20 A. Yes. The County believes that Sunoco can and should be required to do the following:
21 (1) enhance public warning, (2) provide detailed information regarding its infrastructure
22 to the County, (3) assist in the development of an evacuation plan for use by

1 municipalities with concept of how evacuation would occur, (4) create a public outreach
2 and public education program and (5) fund more training for first responders.

3
4 **Q. WHAT RECOMMENDATION DOES THE COUNTY PROPOSE TO ENHANCE**
5 **THE WARNING TO THE PUBLIC?**

6 A. The County recommends the following:

7 • Sunoco should install monitoring devices that integrate with public warning
8 devices (such as feed into a siren) to improve notification to the community. This is
9 currently being done for utilities with nuclear plants in the County.

10 • Sunoco should integrate direct connection from pipeline control centers with
11 the County's 911 communications center. This will allow faster notification for
12 emergency response and public warning in an emergency.

13 • Sunoco should develop standard notification templates for public warning
14 systems to be used during a pipeline emergency and develop emergency classification
15 levels which are specifically designed to make the public aware of the situation.

16 • Sunoco should add an odorant and die to all odorless and/or colorless liquids
17 and gasses to allow for quick identification of a release or spill to enhance detection and
18 notification to the public.

19 • As technological improvements develop, Sunoco should install intrinsically
20 safe (i.e. certified no to create a spark) warning devices, along the pipeline right of way,
21 which would notify the public of a leak, emergency, or potential danger along the
22 pipeline. Currently there are such devices installed on the valves along the pipeline.

23

1 **Q. IN YOUR PROFESSIONAL OPINION WILL THIS REQUESTED**
2 **RECOMMENDATIONS ENHANCE PUBLIC SAFETY?**

3 A. Yes. The public safety will be enhanced as a result of the County having timely, specific
4 detailed information regarding the pipeline activities so a consistent and clear message
5 can be provided to the public.

6

7 **Q. WHAT RECOMMENDATION DOES THE COUNTY PROPOSE TO ENHANCE**
8 **THE ALL HAZARDS PLANNING APPROACH?**

9 A. The County recommends the following:

10 • Sunoco has the technical expertise regarding the pipeline operations and should
11 provide detailed information and assistance with the creation of specific annexes or plans
12 so that state, county, and local emergency services organizations can be better prepared
13 for the specific hazards of pipeline emergencies in their communities.

14 • As a critical stakeholder, Sunoco should provide local emergency planning
15 assistance to local emergency management partners that could consist of dedicated
16 employee(s) and or funding to support additional employees.

17 • Sunoco must be required to notify not only the County but all municipalities in
18 Chester County of anticipated, scheduled or commenced work done in Chester County.

19 • Sunoco must be required to notify County officials, in advance, of any pipeline
20 activity, such as simulations, testing, routine maintenance, repairs etc.

21 • Chester County recommends that the notification process used by the nuclear
22 power stations be replicated for Hazardous Liquid utilities. Based on its experience with

1 the Limerick Nuclear Plant Generating Station, Chester County strongly urges the
2 Commission to adopt a process

3
4 **Q. ARE YOU AWARE OF ANY UTILITY THAT IS PROVIDING FUNDING TO**
5 **SUPPORT ADDITIONAL EMPLOYEES?**

6 A. Yes. Exelon funds a full-time position with responsibilities to plan exclusively for an
7 emergency involving either the Limerick or Peach Bottom nuclear plants.

8
9 **Q. IN YOUR PROFESSIONAL OPINION WILL THE REQUESTED**
10 **RECOMMENDATIONS ENHANCE THE ALL HAZARDS PLANNING**
11 **APPROACH?**

12 A. Yes. A dedicated pipeline planner would benefit the County since the planner would
13 address the unique and specific needs of the municipalities and the public in a pipeline
14 emergency.

15
16 **Q. WHAT RECOMMENDATION DOES THE COUNTY PROPOSE TO ENHANCE**
17 **EVACUATION PLANNING?**

18 A. The County recommends the following:

19 • Sunoco is the subject matter expert regarding a pipeline emergency and as a
20 critical stakeholder must do more than “check the boxes” to show that they are a good
21 corporate citizen.

22 • Sunoco needs to develop, in cooperation with state, county, and local emergency
23 services and municipalities evacuation and shelter in place plans or annexes to the EOP

1 for each county, municipality, neighborhood, high-occupancy structure, high-hazard area,
2 school, hospital, church, public gathering place, or any other area or parcel that may need
3 assistance or direction evacuating during a pipeline emergency.

4 • Sunoco should have regular and ongoing training, exercises, and community
5 outreach / public education to anyone who may be impacted (directly or indirectly) by an
6 evacuation or shelter in place order. Currently, Sunoco may be “checking the boxes” that
7 complies with existing law, but it is generic and provide minimal information to the
8 public.

9 • Sunoco should be required to maintain a comprehensive database of pipeline
10 information and to provide this information to DES including:

- 11 a. Maps of all transmission lines listing material moved, pipeline diameter,
12 mainline valve locations and maximum operating pressures (MOP), and
13 maximum allowable operating pressure (MAOP).
- 14 b. Information about the location of any anomalies that merit pressure
15 reduction in the pipeline and the presence of “immediate”, “60-day” or
16 “180-day” repair conditions for liquid pipelines or “immediate” or “one-
17 year” repair conditions for gas pipelines.

18
19 **Q. IN YOUR PROFESSIONAL OPINION WILL THE REQUESTED**
20 **RECOMMENDATIONS ENHANCE EVACUATION PLANNING?**

21 A. Yes.

1 **Q. HAS SUNOCO SHARED ITS EMERGENCY MANAGEMENT SERVICES PLAN**
2 **WITH THE COUNTY?**

3 A. Unlike other active pipeline operators in the County, we had to essentially beg for
4 Sunoco to share its written Emergency Management Services Plan with the County.

5
6 **Q. WHAT IS THE COUNTY'S OBLIGATION TO PROTECT INFORMATION**
7 **REGARDING ACTIVE PIPELINE OPERATORS?**

8 A. The County takes its obligation to protect confidential and proprietary information very
9 seriously. As with the plans for other active operators, the County has a process in place
10 to protect that information.

11
12 **Q. HAS SUNOCO SHARED ITS RISK ASSESSMENT WITH THE COUNTY?**

13 A. Sunoco provided the County with a briefing on their risk assessment, but they have not
14 shared the document in its entirety. Sunoco should be required to identify threats that can
15 cause a failure on the pipeline segment in High Congestion Areas and what assessment
16 method (smart pigs, hydrotesting, direct assessment or other technology) is used to
17 evaluate and address threats in a timely manner.

18
19 **Q. WHAT RECOMMENDATION DOES THE COUNTY PROPOSE TO ENHANCE**
20 **PUBLIC EDUCATION AND AWARENESS OF WHAT TO DO DURING**
21 **PIPELINE EMERGENCY?**

22 A. Sunoco must correct its lack of physical presence regarding public outreach and
23 education in Chester County. Any public outreach and education must be specific to the

1 the neighborhoods, streets, and houses potentially affected. The public outreach and/or
2 education program should not be generic as “one size fits all “generic approach across
3 Sunoco’s footprint in the Commonwealth:

4 • Create a more robust public outreach and public education program to inform the
5 public about what to expect during training or routine maintenance as well as what to do
6 in a pipeline emergency.

7 • Work with the local communities to educate the public of the options to shelter in
8 place or evacuate providing clear and consistent message. This will permit all residents
9 to discuss and create responsible an individual plan for their family regarding sheltering
10 in place and evacuation.

11 • Enhance planning funding/resources for pipeline emergencies.

12
13 **Q. IN YOUR PROFESSIONAL OPINION WILL THE REQUESTED**
14 **RECOMMENDATIONS ENHANCE PUBLIC EDUCATION AND AWARENESS?**

15 A. Yes. By working together, the stakeholders can create factors for consideration for each
16 individual plan and provide consistent information to better educate/ inform the public.

17
18 **Q. WHAT RECOMMENDATION DOES THE COUNTY PROPOSE TO ENHANCE**
19 **THE SERVICES PROVIDED BY FIRST RESPONDERS?**

20 A. The County recommends the following:

21 • Sunoco should meet with all fire, police, EMS, and Hazmat departments
22 responsible for the potential impact areas and assist those organizations with having the

1 most technologically advanced and appropriate equipment for responding to a potential
2 pipeline leak.

3 • Sunoco should support a mission sustainment plan to ensure equipment is
4 maintained and updated and/or replaced on a regular basis.

5 • Sunoco should support response equipment purchasing on a regular basis that
6 directly support pipeline and or hazardous condition responses.

7 • Sunoco should develop more robust pipeline training programs for first
8 responders that provides real opportunities for responder to test their knowledge and
9 skills through hands on exercises.

10 • Sunoco should compensate first responders and agencies for training time and
11 expenses due to the fact that many of the County's first responders are volunteers.

12
13 **Q. IN YOUR PROFESSIONAL OPINION WILL THE REQUESTED**
14 **RECOMMENDATIONS ENHANCE THE SERVICES PROVIDED BY FIRST**
15 **RESPONDERS?**

16 A. Yes.

17
18 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

19 A. Yes. However, I reserve the right to submit supplemental testimony if additional issues
20 arise during the course of this proceeding.