

# Uwchlan Township

Chester County, Pennsylvania  
(610) 363-9450 FAX (610) 363-0518

Britton Ex RB-2  
10/24/19 re  
West Chester  
C-2018-3006116

715 North Ship Rd.  
Exton, PA 19341-1940  
[www.uwchlan.com](http://www.uwchlan.com)

November 14, 2018

Mr. Richard D. Flinn, Jr., Director  
Pennsylvania Emergency Management Agency  
1310 Elmerton Ave.  
Harrisburg, PA 17110

RE: Uwchlan Township Emergency Management Assistance

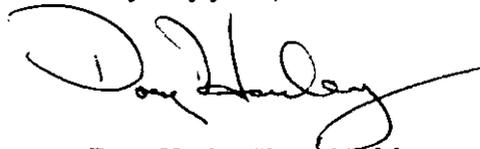
Dear Mr. Flinn,

The purpose of this letter is to request Pennsylvania Emergency Management Agency's (PEMA) assistance. Uwchlan Township (Township) is a Second Class Township located in Chester County, Pennsylvania. The Township has a population of approximately 19,000 residents. Located within the Township are numerous schools, places of worship and other places of public assembly. The Township has developed a disaster emergency management plan. However, the Township has seen a significant increase in natural gas liquid (NGL) pipeline activities. These activities include the repurposing of the Mariner East 1 pipeline, the ongoing construction of the Mariner East 2 and 2X pipelines, and, most recently, the proposed repurposing of the Point Breeze-Montello pipeline (aka 12" line), to carry NGLs through the Township.

In light of these activities, the Township requests that PEMA, among other things, provide technical advice and assistance to the Township in reviewing and revising the Township's disaster emergency management plan, and assist the Township in establishing and operating training programs and programs of public information. PEMA has the power and duty to provide such assistance pursuant to Section 7313 of the Emergency Management Services Code, 35 Pa. C.S. § 7313(4), (5).

We request your prompt response to this request and look forward to working with your you and your staff. Thank you for your attention to this matter.

Very truly yours,



Doug Hanley, Township Manager

cc: Mr. John Haynes, Acting Director, Chester County Department of Emergency Services

Mr. John McNamara, Uwchlan Township Emergency Management Coordinator

Captain Scott Alexander, Uwchlan Township Police Chief

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# Uwchlan Township

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(610) 363-9450 FAX (610) 363-0518

715 North Ship Rd.  
Exton, PA 19341-1940  
[www.uwchlan.com](http://www.uwchlan.com)

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November 14, 2018

Mr. John Haynes, Acting Director  
Chester County Dept. of Emergency Services  
Government Services Center  
601 Westtown Rd., Suite 012  
West Chester, PA 19380

**RE: Uwchlan Township Emergency Management Assistance**

Dear Mr. Haynes,

The purpose of this letter is to request the Chester County Department of Emergency Services (DES) assistance. Uwchlan Township (Township) is a Second Class Township located in Chester County, Pennsylvania. The Township has a population of approximately 19,000 residents. Located within the Township are numerous schools, places of worship and other places of public assembly. The Township has developed a disaster emergency management plan. However, the Township has seen a significant increase in natural gas liquid (NGL) pipeline activities. These activities include the repurposing of the Mariner East 1 pipeline, the ongoing construction of the Mariner East 2 and 2X pipelines, and, most recently, the proposed repurposing of the Point Breeze-Montello pipeline (aka 12" line), to carry NGLs through the Township.

In light of these activities, the Township requests that DES, among other things, provide technical advice and assistance to the Township in reviewing and revising the Township's disaster emergency management plan, and assist the Township in establishing and operating training programs and programs of public information.

We request your prompt response to this request and look forward to working with your you and your staff. Thank you for your attention to this matter.

Very truly yours,



Doug Hanley, Township Manager

cc: Mr. Richard D. Flinn, Jr., Director, Pennsylvania Emergency Management Agency  
Mr. John McNamara, Uwchlan Township Emergency Management Coordinator  
Captain Scott Alexander, Uwchlan Township Police Chief

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Bs: Han Ex RB-3  
10/24/19 West Chester TX  
C-2019-3006116

**C&H**  
**Curtin & Heefner** LLP  
ATTORNEYS AT LAW

2005 S. EASTON ROAD • SUITE 100 • DOYLESTOWN, PA 18901  
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WWW.CURTINHEEFNER.COM  
CELEBRATING OVER 80 YEARS

MARK L. FREED  
MLF@curtinheefner.com

August 10, 2018

Rosemary Chiavetta, Esquire  
Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Repurposing of Sunoco Pipeline, L.P.'s Point Breeze-Montello Line**

Dear Secretary Chiavetta:

This firm is solicitor to Uwchlan Township, Chester County. We are writing to express the Township's concerns regarding Sunoco Pipeline, L.P.'s plan to repurpose the existing Point Breeze-Montello pipeline to convey hazardous liquids through Uwchlan Township in an easterly direction. The Point Breeze-Montello pipeline was built in the 1930's and was previously used to convey refined petroleum products in the westerly direction. In 2014, the Pipeline and Hazardous Materials Safety Administration (PHMSA) warned "of the potential significant impact [that] flow reversals, product changes and conversion to service may have on the integrity of a pipeline. Failures on natural gas transmission and hazardous liquid pipelines have occurred after these operational changes." 79 FR 56121. Unlike the route of the Point Breeze-Montello pipeline in other areas, in Uwchlan Township the route of the pipeline diverges significantly from the route of the existing Mariner East 1 pipeline, thereby exposing many additional neighborhoods, schools and businesses to the risks associated with hazardous liquids pipelines. In particular, the Point Breeze-Montello pipeline runs under or near Lionville Park, the Lionville Middle School, the Lionville YMCA, Downingtown East High School, the Shamona Creek Elementary School and the Marsh Creek Sixth Grade Center. Lionville Middle School is sandwiched between the Point Breeze-Montello pipeline and the Mariner East pipeline.

In addition to the general concerns regarding the repurposing of the Point Breeze-Montello pipeline, the Township seeks answers to the following questions:

- Sunoco has reported that the Point Breeze-Montello line is a 12-inch pipeline. However a map that appears to notate some of Sunoco's pipelines identifies the Point Breeze-Montello line as an 8-inch line. See attached. Is the pipeline 12 inches or 8 inches?

Rosemary Chiavetta, Esquire  
Secretary – PA Public Utility Commission  
Page 2  
August 10, 2018



- By letter dated July 26, 2018, to Senator John Rafferty, Jr., the PUC advised that Sunoco filed a “construction notice” with the PUC and PHMSA. PHMSA “strongly” encourages operators “to submit a comprehensive plan to the appropriate PHMSA regional office prior to performing flow reversals, product changes and conversions to service.” 79 FR 56121. Did Sunoco comply with PHMSA’s strong recommendation and submit such a comprehensive plan?
- PHMSA advises that, even with a new hydrostatic pressure test “it may not be advisable to perform flow reversals, product changes or conversion to service” for, among other things, “LF-ERW pipe, lap welded, unknown seam types and with seam factors less than 1.0 as defined in §§ 192.113 and 195.106.” 79 FR 56122. Has Sunoco confirmed the types of welds and seams on the Point Breeze-Montello line? If so, would you please identify the types of welds and seams on the pipeline?
- PHMSA’s 2014 Guidance for Pipeline Flow Reversals, Product Changes and Conversion to Service provides that “Public Awareness programs need to be modified for the changing product and associated risks, and additional notification may be required prior to change § 195.440.” (p. 14). Has Sunoco modified its Public Awareness program? If so, would you please provide us with the details of the program?
- PHMSA’s 2014 Guidance also provides that “Operators need to update their risk analysis and identify the need for additional or modified preventative and mitigative (P&M) per § 195.452(i)(iii).” (p. 14). Has Sunoco taken this action?

We are also in receipt of the July 20, 2018 letter from West Whiteland Township to the PUC and PHMSA posing additional important questions. Copies of those letters are attached hereto. We also request answers to the questions posed by West Whiteland Township.

We ask that the PUC consider the Township’s concerns and respond to the questions posed herein before allowing the repurposing of the Point Breeze-Montello pipeline to proceed.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mark L. Freed'.

Mark L. Freed  
For CURTIN & HEEFNER LLP

Enclosures

Exhibit A – Map of Sunoco Logistics L.P. Inactive Pennsylvania Pipelines

Exhibit B – July 20, 2018 letters from West Whiteland Township to PUC and PHMSA

# Sunoco Logistics Pennsylvania



Status	
	Active
	Inactive





101 Commerce Drive  
Exton, Pennsylvania 19341

Tel: (610) 363-9525  
www.westwhiteland.org

July 20, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: Repurposing of Sunoco Pipeline L.P.'s 12" pipeline to carry natural gas liquids

Dear Secretary Chiavetta,

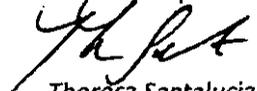
We are writing to express our questions and concerns about Sunoco Pipeline's plans to repurpose an existing 12-inch pipeline to carry natural gas liquids across Pennsylvania to their refinery in Marcus Hook. This pipeline was built in the 1930's and crosses the length of West Whiteland Township through busy commercial areas and numerous residential neighborhoods. On behalf of our community, we are seeking reassurance that if this pipeline is permitted to transport highly volatile liquids, it will be safe to operate so close to homes, businesses and gathering places.

In particular, we seek answers to the following questions:

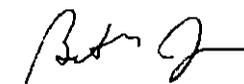
- What approvals does Sunoco Pipeline need from the Public Utility Commission to repurpose this pipeline to carry natural gas liquids?
- Is Sunoco required to provide any public notice to the residents in the communities in which the repurposed pipeline is located about this proposed change before it is approved?
- Will Sunoco be required to upgrade some or all of this pipeline before it is permitted to convey natural gas liquids through it?
- Could an overview be provided of the steps to be taken by Sunoco and regulators to ensure an 80+ year old pipe, designed to carry petroleum products at low pressure, is capable of sustaining the increased operating pressure associated with the natural gas liquids and will operate safely?
- How old is the actual pipe in the ground? In other words, how long has it been since the segments in West Whiteland Township have been replaced?
- Is this 12" pipeline the same pipeline that recently leaked petroleum into Darby Creek near the Philadelphia Airport?
- What requirements does Sunoco have to report any approved changes to the Pennsylvania One Call System and emergency responders?

We would appreciate the PUC's assistance in understanding what requirements are in place to ensure the safety of this pipeline and how the PUC monitors compliance.

Sincerely,  
West Whiteland Township  
Board of Supervisors

  
Theresa Santalucia  
Chairman

  
Michele Moll  
Vice-Chairman

  
Beth Jones  
Member

5



101 Commerce Drive  
Exton, Pennsylvania 19341

Tel: (610) 363-9525  
www.westwhiteland.org

July 20, 2018

Howard Elliott, Administrator  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Repurposing of Sunoco Pipeline L.P.'s 12" pipeline to carry natural gas liquids

Dear Mr. Elliott,

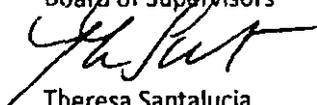
We understand that Sunoco Pipeline, LP has notified PHMSA of their plans to repurpose an existing 12-inch pipeline to carry natural gas liquids across Pennsylvania to their refinery in Marcus Hook, PA. This pipeline was built in the 1930's and crosses the length of West Whiteland Township through busy commercial areas and numerous residential neighborhoods. On behalf of our community, we are seeking reassurance that if this pipeline is permitted to transport highly volatile liquids, it will be safe to operate so close to homes, businesses and gathering places.

In particular, we seek answers to the following questions:

- What approvals does Sunoco Pipeline need from PHMSA to repurpose this pipeline to carry natural gas liquids?
- Is Sunoco required to provide any public notice to the residents in the communities in which the repurposed pipeline is located about this proposed change before it is approved?
- Will Sunoco be required to upgrade some or all of this pipeline before it is permitted to convey natural gas liquids through it?
- Could an overview be provided of the steps to be taken by Sunoco and regulators to ensure an 80+ year old pipe, designed to carry petroleum products at low pressure, is capable of sustaining the increased operating pressure associated with the natural gas liquids and will operate safely?
- How old is the actual pipe in the ground? In other words, how long has it been since the segments in West Whiteland Township have been replaced?
- Is this 12" pipeline the same pipeline that recently leaked petroleum into Darby Creek near the Philadelphia Airport?
- What requirements does Sunoco have to report any approved changes to the Pennsylvania One Call System and emergency responders?

We would appreciate PHMSA's assistance in understanding what requirements are in place to ensure the safety of this pipeline and how PHMSA monitors compliance.

Sincerely,  
West Whiteland Township  
Board of Supervisors

  
Theresa Santalucia  
Chairman

  
Michele Moll  
Vice-Chairman

  
Beth Jones  
Member

# Uwchlan Township

*Brittan Ex RB-4  
10/24/19 West Chester  
10/24/19 AX*  
715 North Ship Road  
Exton, PA 19341-1940

(610) 363-9450 FAX (610) 363-0518

Chester County, Pennsylvania

May 31, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: Petition of Senator Dinniman for Interim Emergency Relief; Docket No. P-2018-3001453;  
Senator Dinniman v. Sunoco Pipeline L.P.; Docket No. C-2018-3001451

Dear Secretary Chiavetta:

I am writing to express my support for Senator Dinniman's petition listed above. The Uwchlan Township Board of Supervisors has been carefully monitoring the problems that the Mariner East pipelines have experienced in West Whiteland Township. As a neighbor of West Whiteland, Uwchlan Township shares many of the same geological features, and the pipeline crosses a shared fault line right at the border of our townships. The location of the sinkholes on Lisa Drive is also close to the shared border of our townships, and a number of the disrupted private water wells on Shoen Drive are within the borders of Uwchlan Township.

In Uwchlan Township, Sunoco is installing this pipeline in the backyards of over 100 homes in a densely developed neighborhood. Sunoco has promised enormous economic benefits for the local communities from this pipeline. However, even if the highly optimistic economic projections are to be believed, the residents of Uwchlan Township have seen very little of this economic impact to date, and once the pipeline is operational, there is no foreseen economic benefit specifically to our township, since we do not have the ability to apply an impact fee, nor do any of our residents receive royalties. The economic benefits are distributed primarily to Sunoco and to state and local entities outside of West Whiteland or Uwchlan Townships. On the other hand, our townships have already experienced months of inconvenience and environmental destruction, and, when the ME1 and 2 projects are operational, residents in hundreds of homes will permanently live under the risk of a catastrophic event. The benefits of

this projects are distributed broadly across the state and region (as well as to Sunoco's bottom line), but the risks are highly focused.

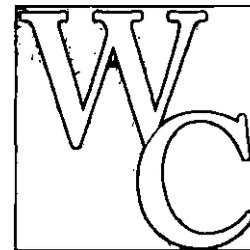
Under these conditions, it is perfectly reasonable to demand that Sunoco satisfy all reasonable safety requirements for the ME1, ME2 and ME2X pipelines, as well as to expect that it has explored alternative routes to deliver these materials to its markets. As detailed in Senator Dinniman's complaint, Sunoco's experience has shown that this pipeline cannot be safely constructed in West Whiteland Township. The complaint also describes serious and consistent negligence in performing adequate geological and safety assessments of the drilling technique, as well as the potential impact of the ME2 project on the integrity of the ME1 pipeline. Sunoco has failed to provide an emergency plan to the public that can be implemented in practical way given the density of the population and the diverse physical abilities of potential evacuees. On behalf of the Board of Supervisors and residents of Uwchlan Township, I write to support Senator Dinniman's action and to ask the PUC to uphold the suspension of the Mariner East project.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Miller". The signature is fluid and cursive, with a large initial "B" and "M".

Bill Miller, Chairman

Uwchlan Township Board of Supervisors



Britton Ex RB-6 10/24/19  
C-2018-302616  
West Chester  
PX

October 23, 2018

Mr. Paul Metro  
Manager of Gas Safety  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg PA 17120

Dear Mr. Metro,

We are writing this letter on behalf of the Downingtown Area School District, Rose Tree Media School District, and West Chester Area School District to ask you to conduct a safety investigation of the old 12 inch Sunoco Pipeline. It is our understanding that Sunoco is going to be running natural gas liquid through this 12 inch pipe since the construction on the Mariner II pipeline has been temporarily halted. We believe it is incumbent upon school districts to keep students, parents, and staff safe. We also believe it is incumbent upon the PUC and the leaders of the state of Pennsylvania to keep its residents safe.

Specifically, we are asking you to conduct a safety assessment of this pipe to include the following:

1. What is the risk for unprotected valve stations, currently many of these valve stations have temporary fencing without adequate protection from a possible accident.
2. Is it safe to run natural gas liquid through this 12 inch pipe?
3. Does this old 12 inch pipe contain shut off valves for emergency shut off in the event of a breach?

While we are not experts in the area of safely transporting chemical products through a 12 inch pipeline we are often asked by our parents about our plans in the case of a catastrophic breach or explosion in this pipe. We need help from the PUC to answer the question about safety.

We understand that Sunoco is planning on transporting product in the near future. We all have developed safety and evacuation plans for hazardous disasters, however, our plans did not take into consideration the risks and dangers involved with moving product through an 80 year old pipe.

Sincerely,

Emilie M. Lonardi, Ph.D.  
Superintendent of Schools  
Downingtown Area SD

Eleanor DiMarino-Linnen, Ph.D.  
Acting Superintendent of Schools  
Rose Tree Media SD

James R. Scanlon, EdD  
Superintendent of Schools  
West Chester Area SD

cc: DASD, RTMSD, and WCASD Board of School Directors  
Gladys Brown, PA PUC Chair  
Rosemary Chiavetta, PA PUC Secretary  
Robert Young, PA PUC Deputy Chief Counsel Gas/Electric  
Governor Tom Wolf  
Senator Andy Dinniman  
Senator Tom Killion  
Senator Tom McGarrigle

Representative Stephen Barrar  
Representative Carolyn Comitta  
Representative Becky Corbin  
Representative Tim Hennessey  
Representative Harry Lewis, Jr.  
Representative Duane Milne  
Representative Chris Quinn  
Representative Eric Roe

540 Trestle Place  
Downingtown PA 19335  
610-269-8460

308 N. Olive Street  
Media PA 19063  
610-627-6000

782 Springdale Drive  
Exton PA 19341  
484-266-1018

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COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120

*Br, Hon Ex 10*  
*C-2018-300616*  
*10/24/19 West Chester*  
*TX*

IN REPLY PLEASE  
REFER TO OUR FILE

November 1, 2018

Dr. Emilie M. Lonardi, Superintendent  
Downingtown Area School District  
540 Trestle Place  
Downingtown, Pennsylvania 19335

Dr. Eleanor DiMarino-Linnen, Acting Superintendent  
Rose Tree Media School District  
308 North Olive Street  
Media, Pennsylvania 19063

Dr. James R. Scanlon, Superintendent  
West Chester Area School District  
829 Paoli Pike  
West Chester, Pennsylvania 19380

RE: Mariner 2 Pipeline Project  
Joint Letter dated October 23, 2018 to Paul Metro

Dear Drs. Lonardi, DiMarino-Linnen, and Scanlon:

Thank you for your joint letter dated October 23, 2018 on behalf of the school districts you represent regarding the Sunoco Pipeline projects located in Chester and Delaware Counties. I am aware that you also faxed the letter to Chairman Gladys Brown of the Commission.

The Pennsylvania Public Utility Commission's (PUC) Bureau of Investigation and Enforcement (I&E) is responsible for pipeline and electric safety throughout the Commonwealth. I&E is an independent arm of the Commission and does not speak on behalf of the Commission. We have 23 engineers stationed across the Commonwealth inspecting jurisdictional facilities daily. Our Pipeline Safety Section employs 18 federally certified engineers. Our Pipeline Safety Program works jointly with the federal Pipeline and Hazardous Material Safety Administration (PHMSA) in performing inspections on the Sunoco projects. The PUC's safety responsibilities are the highest priority for the Commission.

During the last two (2) years, our safety staff has inspected various Sunoco facilities more than 200 hundred days. Our engineers work on Sunoco projects daily conducting any one of 43 different types of inspections to ensure compliance with the federal and state codes.

Within your letter you request answers to three (3) questions. The answers to the questions are as follows:

1. What is the risk for unprotected valve stations, currently many of these valve stations have temporary fencing without adequate protection from possible accident?

**Answer:** The risks identified to these stations are included within the Integrity Management Plan maintained by Sunoco and reviewed and inspected by the PUC Pipeline Safety Section and PHMSA on a regular basis. There are eight (8) valve stations located in the GRE 12 Section (bypass) in Chester County. All valve stations except for one (1) are protected by a permanent fence that is secured. One (1) valve station is currently being constructed and has temporary fencing until construction is complete. The valves are locked and secured at this station during construction and meet all federal standards. Additionally, Sunoco will install rectangular concrete blocks at the Dorlan Mill Road station.

2. Is it safe to run natural gas liquid through this 12-inch pipe?

**Answer:** The responsibility of the PUC Pipeline Safety Section and PHMSA is to monitor and enforce compliance to the state and federal regulations. It is Sunoco's responsibility is to operate and maintain their pipeline facilities in a safe manner through practices and procedures that are in compliance with state and federal regulations.

Examples of actions undertaken by Sunoco to ensure that the referenced pipeline is safe include:

**Hydrostatic (non-flowing water) Testing:**

Sunoco has performed two (2) hydrostatic pressure tests on the GRE 12 (Bypass Line) in consecutive years; October 2017 and September 2018. No leaks were discovered in either test. These tests have been reviewed and inspected by the PUC Pipeline Safety staff and PHMSA.

Additionally, the GRE 12 (Bypass Line) is currently holding pressure.

Hydrostatic testing is periodically used to assess the integrity of hazardous liquid and gas transmission pipelines. If a pipeline successfully passes a hydrostatic pressure test, it can be assumed that no hazardous defects are present in the tested pipe.

## **Integrity Management Plans**

Sunoco's integrity management programs and plans for the affected pipeline facilities have been reviewed and inspected by the PUC Pipeline Safety staff and PHMSA. Integrity management requires operators to proactively anticipate hazards, evaluate risks and identify preventative and mitigative actions to manage operational changes that have the potential to increase the risk of failure or the increase in potential consequences of a failure.

### **PHMSA Flow Reversal Guidelines:**

In addition, Sunoco has adhered to the Flow Reversal Guidelines established by PHMSA. PHMSA has issued an Advisory Bulletin to alert hazardous liquid and gas transmission pipeline operators of the impacts associated with flow reversals, product changes, and conversions to service. The Advisory, issued in conjunction with newly-published Agency Guidance on these issues, recommends that operators consult existing conversion of service requirements for flow reversals and product changes and undertake additional actions in order to ensure integrity and safety.

While acknowledging in the associated Guidance that the Agency's recommended practices are not required, PHMSA nevertheless makes a number of suggestions, including that operators consider pressure testing the entire pipeline prior to flow reversals on gas and liquid pipelines and prior to significant product changes on liquid lines.

In order to address the Flow Reversal Guidance, the PUC Pipeline Safety Staff has reviewed and inspected the following to ensure Sunoco was able to demonstrate voluntary compliance:

- a) impacts to O&M,
- b) emergency plans,
- c) operator qualification training,
- d) emergency responder training,
- e) public awareness,
- f) spill response,
- g) maps and records.

3. Does this old 12-inch pipe contain shut off valves for emergency shut off in the event of a breach?

### **Answer:**

Yes. Sunoco/ETP has a total of eight (8) valve locations on the 24.5 miles of GRE 12 reversal section. Six (6) of these valve locations contain Emergency Flow Restricting Devices ("EFRD") and two are manual valves. All manual valves are within the locked fencing and are secured by an additional lock on the valve itself to prevent unauthorized or accidental operation.

The PUC Pipeline Safety staff and PHMSA have held lengthy discussions with Sunoco about valve placement and locations for the EFRD automated valves on the 24.5-mile section of the GRE line.

As a result of PUC Pipeline Safety staff concerns and discussions, Sunoco has presented a change to the EFRD locations. Sunoco reduced the distance between the EFRDs. Sunoco changed a planned manual operated valve to an EFRD and thus reduced the distance between automated valves. Sunoco also changed the EFRD location at the southern point of the GRE section.

The PUC Pipeline Safety Division has reviewed the valve locations and has identified the valve locations and spacing within the school districts. PUC Pipeline Safety also reviewed the distance between the valves and has verified installed fencing, and plans to install fencing, at each of these locations.

Finally, I strongly urge that the above-mentioned schools actively partner with the County Emergency Manager to ensure that your "all hazards" plan and evacuation plans are up to date and incorporate all pipeline hazards. I would offer to meet with you to discuss the Sunoco projects and facilities and answer any other questions regarding pipeline safety that you may have.

Thank you again for your interest in these issues.

Sincerely,



Paul J. Metro  
Manager, Safety Division  
Investigation and Enforcement Bureau  
Pennsylvania Public Utility Commission

CC: Gladys Brown, Pennsylvania Public Utility Commission Chairman  
Richard A. Kanaskie, PUC Chief Prosecutor  
Michael Swindler, Deputy Chief Prosecutor of Enforcement  
Robert Horensky, Supervisor Pipeline Safety Section