

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:  
OEP/DG2E/Gas 4  
Dominion Transmission Inc.  
Supply Header Project  
Atlantic Coast Pipeline, LLC  
Atlantic Coast Pipeline Project  
Docket Nos. PF15-5-000  
PF15-6-000

September 3, 2015

Matthew Bley  
701 E. Carey Street,  
Director, Gas Transmission Certificates  
Richmond, VA 23219

**Re: Staff's Comments on Supplemental Information Filed on July 27, 2015**

Dear Mr. Bley:

The enclosure contains our comments on Atlantic Coast Pipeline, LLC's (Atlantic) and Dominion Transmission Inc.'s (DTI) draft Karst Terrain Assessment, Construction, Monitoring, and Mitigation Plan (Karst Plan); Spill Prevention, Control, and Countermeasures Plan; Winter Construction Plan; Invasive Plant Species Management Plan; and Blasting Plan for the planned Supply Header Project (SHP) and Atlantic Coast Pipeline Project (ACP Project) which were filed with the Commission on July 27, 2015. Unless otherwise indicated, our comments should be addressed in the final Resource Reports to be filed by Atlantic and DTI. To increase the efficiency of our review, the final resource reports should include a matrix indicating where these comments are addressed and a schedule for submittal of any requested information that is not included in the final resource reports.

Thank you for your cooperation. If you have any questions, please contact me at 202-502-6287.

Sincerely,

Kevin Bowman  
Environmental Project Manager

## Office of Energy Projects

Enclosure

cc: Public File, Docket Nos. PF15-5-000 and PF15-6-000

Steve Gibson  
Environmental Scientist  
U.S. Army Corps of Engineers  
Norfolk District Regulatory Branch  
803 Front Street  
Norfolk, VA 23510

Craig Brown  
Regulatory Specialist  
U.S. Army Corps of Engineers  
Wilmington District Regulatory Branch  
69 Darlington Avenue  
Wilmington, NC 28403

Emily Greer  
Regulatory Specialist  
U.S. Army Corps of Engineers  
Wilmington District Regulatory Branch  
69 Darlington Avenue  
Wilmington, NC 28403

Chris Carson  
U.S. Army Corps of Engineers  
Huntington District Regulatory Branch  
502 Eighth Street  
Huntington, WV 25701

Josh Shaffer  
Senior Regulatory Specialist  
U.S. Army Corps of Engineers  
Pittsburgh District Regulatory Branch  
2200 William S. Moorhead Federal Building  
1000 Liberty Avenue  
Pittsburgh, PA 15222

Alani Taylor  
Regulatory Specialist  
U.S. Army Corps of Engineers  
Pittsburgh District Regulatory Branch  
2200 William S. Moorhead Federal Building  
1000 Liberty Avenue  
Pittsburgh, PA 15222

Jean Gibby  
Chief, Raleigh Regulatory Field Office  
U.S. Army Corps of Engineers - Wilmington District  
69 Darlington Avenue  
Wilmington, NC 28403

Mike Montone  
Regulatory Program Manager  
U.S. Army Corps of Engineers  
South Atlantic Division  
60 Forsyth Street SW, Room 10M15  
Atlanta, Georgia 30303-8801

Suzanne Chubb  
Regulatory Program Manager  
U.S. Army Corps of Engineers  
Great Lakes and Ohio Division  
550 Main Street  
Cincinnati, Ohio 45202

James Haggerty  
Regulatory Program Manager  
U.S. Army Corps of Engineers  
North Atlantic Division  
302 General Lee Avenue  
Brooklyn, NY 11252

Chris Lowie  
Refuge Manager  
U.S. Fish and Wildlife Service  
Great Dismal Swamp National Wildlife Refuge  
3100 Desert Road  
Suffolk, VA 23434

Jennifer P. Adams  
Special Project Coordinator  
U.S. Forest Service  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Carol Grundman  
Realty Specialist  
Bureau of Land Management, DOI  
626 E. Wisconsin Ave  
STE 200  
Milwaukee, WI 53202

Tom Speaks  
Forest Supervisor  
U.S. Forest Service  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Clyde Thompson  
Forest Supervisor  
U.S. Forest Service  
Monongahela National Forest  
200 Sycamore Street  
Elkins, WV 26241

Thomas G.S. UyBarreta  
Environmental Protection Specialist, EAID  
U.S. Environmental Protection Agency  
1650 Arch St. (3EA30)  
Philadelphia, PA 19103

Clifford Brown  
Wildlife Biologist  
West Virginia Department of Natural Resources  
Building 74  
324 Fourth Ave  
South Charleston, WV 25303

Patrick Campbell  
Deputy Director - Water and Waste Management  
West Virginia Department of Environmental Protection  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

Wilma Reip  
Environmental Resources Program Manager  
West Virginia Department of Environmental Protection  
601 57th Street SE  
Charleston, WV 25304

**Federal Energy Regulatory Commission  
Comments on Draft Plans**

**Supply Header Project - Docket No. PF15-5-000  
Atlantic Coast Pipeline Project - Docket No. PF15-6-000**

**Karst Terrain Assessment, Construction, Monitoring, and Mitigation Plan**

1. Geologic Overview, page 3. Provide the milepost ranges that the ACP Project and SHP would traverse each of the three karst provinces, and include a figure that depicts each project in relation to the karst provinces that would be crossed.
2. Describe in the Karst Plan and/or section 6.6 of Resource Report 6 any training that would be provided to construction or inspection personnel regarding the identification of karst features and the prevention of potential for sinkhole formation during construction.
3. For karst features that are identified during pre-construction inspections and may be impacted by construction, indicate if design modifications would be implemented to protect the pipeline facilities, such as adopting minor route variations or installing thicker-walled pipe.
4. Discuss whether alternative karst identification methods would be utilized should the effectiveness of the electrical resistivity investigation be limited due to unusual ground conditions, such as highly conductive ground surface layers.
5. Indicate whether Atlantic and DTI would inform the FERC of karst-related issues encountered and addressed during construction in each company's monthly construction status reports.
6. Include citations at the appropriate text locations for the references that are provided in the Karst Plan.

**Spill Prevention, Control, and Countermeasures Plan**

7. Section 5.0.A.1.a. Clarify if the Contractor would provide site-specific descriptions and maps depicting the location of all fixed and mobile hazardous material containers, or just oil containers.
8. Section 5.0.A.3.c. Identify typical instances when a written refueling exemption would be sought by the Contractor.

9. Section 5.0.C.1. Confirm whether washout activities would be conducted within 100 feet of wetlands, waterbodies, or springs, or with 300 feet of karst features.
10. Section 7.0.A. Define the reportable spill thresholds for each state and for each potential fuel and hazardous material that would be used during the project.
11. Section 8.0.A.1. Confirm whether traffic on contaminated soils can be prevented instead of minimized.
12. Section 8.0.B. Clarify if the measures identified in section 8.0.B would be implemented immediately after a spill or if necessary permits would be obtained prior to implementing these measures.
13. Section 8.0.B.2. Define whom would be the site remediation specialist(s) or provide general qualifications for this position(s).

### **Winter Construction Plan**

14. Section 3.0. Confirm if landowner permission would be obtained prior to blowing snow to off right-of-way areas.
15. Section 4.0, page 4. Further clarify how segregated topsoil would be preserved if stockpiled over Winter. Mulching may be ineffective if crimping cannot be conducted during frozen conditions.
16. Section 4.0. Soils excavated while frozen may slump if they thaw. Discuss measures to prevent the mixing of topsoil and subsoil piles if slumping occurs.
17. Section 5.0. Identify alternative erosion control measures in wetland areas in lieu of utilizing snow berms, if snow is not available or in the event melted runoff undercuts the snow berms (prior to doing so).
18. Section 5.0. Describe the average and maximum height of the topsoil crown that would be left over the trenchline.
19. Section 7.0. Clarify if energy-dissipating devices would be installed at the end of slope breakers that are installed prior to Spring thaw.
20. Section 7.0. Clarify what type of variance would be sought if erosion control devices are not accessible due to weather conditions or Spring thaw.
21. Section 12.0. Describe any other frost driving method(s) that might be used, other than snow packing.

### **Invasive Plant Species Management Plan**

22. Provide a discussion of how Atlantic and DTI would comply with 18 CFR 380.15(f)(3) regarding landowner and land-managing agency authorization for the use of herbicides and how Atlantic and DTI would ensure spraying does not occur in those areas where landowners have requested not to have herbicides or other pesticides used on their properties on any state maintained “opt-out” spray list during construction and operation of the facilities.
23. Clarify that Atlantic and DTI would:
  - a. use herbicides registered with the EPA;
  - b. apply herbicides according to specifications of the the Federal Insecticide, Fungicide, and Rodenticide Act; and
  - c. use only certified applicators to apply herbicides.
24. Section 5.1. File all existing invasive species locations identified during field surveys or right-of-way inspections with the Commission.
25. Section 5.1. Provide the locations where threatened and endangered species (Federal and state) and their preferred or critical habitats overlap or are in close proximity to invasive species and describe the measures that would be implemented to ensure invasive species control measures would not impact these resources.
26. Section 5.2.1. It is stated that “In areas of dense infestation, a broader application may be used.” Clarify what defines an area of dense infestation and the definition of a broader application.
27. Section 5.2. Section 5.2. Provide a table that identifies the primary and the alternative treatment methods for each invasive species, including treatment methods that would be utilized to control different growing stages of invasive species and whether treatment methods would vary based on proximity to environmental feature (e.g., wetlands, open water, sensitive species locations, agriculture)..
28. Section 5.2.2. Clarify if equipment would be inspected and cleaned prior to arrival at contractor staging areas and yards
29. Section 5.2.2. Identify the locations of intermediate, additional wash stations prior to the publishing of the draft and final environmental impact statement and prior to construction.
30. Section 5.2.2. Clarify how wash water or cleaning debris would be handled, stored, and disposed.

31. Section 5.2.2. Clarify if topsoil would be segregated in all infested areas, including spoil-side and working-side portions of the construction right-of-way as a method to prevent equipment and workers from transporting and spreading invasive species.
32. Section 5.2.2. Clarify if equipment would be cleaned prior to leaving the SHP and/or ACP Project work sites, or demonstrate how the contractor would ensure soils potentially contaminated with invasive species are not transported from the work site.
33. Section 5.3.2. Clarify and provide examples of “reasonably achievable efforts” that would be employed by Dominion in consultation with landowners to control invasive species in the right-of-way and to prevent their spread onto adjacent landowner property.
34. Section 7.0. Remove the proposed use of vehicle mounted sprayers.

### **Blasting Plan**

35. Section 5.0. Clarify if Atlantic and DTI would provide site-specific blasting procedures for locations where the pipeline route would cross waterbodies or areas that have the potential to contain federally listed or Regional Forester’s sensitive species.
36. Section 7.1. Clarify if the Blasting Plan would be updated, based on agency consultation or permit conditions, to include site-specific restrictions for completing blasting in or near environmentally sensitive areas.

### **General Comments**

37. For rock that would be disposed of, define the maximum duration that rock would be stored on the construction right-of-way and identify rock disposal locations.
38. Ensure that all variances to the FERC’s Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) and Wetland and Waterbody Construction and Mitigation Procedures (Procedures) are identified in the final Resource Reports.