

Atlantic Sunrise Pipeline

Pennsylvania Department of Environmental Protection
Chapter 105 Water Obstruction and Encroachment Permits
Chapter 102 ESCGP2 NOI

Thomas E. Barnard PhD, PE

Harding, PA
570-388-4060
tebarnardpe@epix.net

As a resident of Pennsylvania since 1993 and a member of the Susquehanna Trailers hiking club I have been a witness to the devastation of two rounds of exploitation of the environment by greedy developers of our natural resources. First was the deforestation in the 19th century for timber and then the savage raping of our land and water for coal. The exploiters never bothered to clean up their mess and are long gone. Even today the scars remain.

Now we are faced with the third wave of resource exploitation. The Marcellus Shale gas industry is ravishing our air water and soil as it drills wells for methane and connects them with a vast network of pipelines and associated facilities to process and move the gas to market. History has shown that we cannot trust the industry to protect the environment. It is up Pennsylvania's Department of Environmental Protection to full fill that mission.

I am a registered professional engineer with over 25 years' experience in water resources and water quality. Much of my work has focused on identifying environmental impacts to surface waters and developing measures to mitigate these impacts.

I am neither in favor or opposed to the Atlantic Sunrise Pipeline project. My interests are in insuring that if the pipeline is constructed the resulting environmental impacts be reduced to maximum extent possible.

Over the last 5 fives as a professional and as a local resident I have been witness to the construction of four pipeline projects in Luzerne County. I have visited more than a dozen active construction sites and talked with many local residents and landowners. Published research as well as personal observations have shown that the greatest impact to surface waters occurs to during construction at stream crossings.

I never visited a construction site without noticing a violation of a regulation or a permit condition. Examples include tracking of mud and sediment from the designated work area, failed erosion control structures, flows of sediment laden water from work areas, sweeping of sediment into surface waters, and failed slopes. I am filed numerous reports with DEP and have yet to see evidence of a single sanction of a contractor, the shutdown of a project or, resolution

of violations in timely manner. The most I ever got was a report from DEP saying that they talked to the contractor and he promised to stop doing what he wasn't supposed to do. I have reached the conclusion that DEP is either unwilling or unable to enforce its own regulations.

I have served on Governor Wolfe's Pipeline Infrastructure Task Force. As a member of the Conservation & Natural Resources work group I authored 2 recommendations;

7. During construction activity at gas pipeline sites an environmental inspector should be on site for every 5 miles of active construction. The inspectors should be familiar with the construction plans and all applicable permits. Inspectors should have complete access to the entire site and have the authority to call for a work stoppage until a violation is rectified.
8. During construction and until vegetation establishment has occurred, water quality monitoring should be conducted on flowing streams in the project vicinity that may be impacted by construction. The parameters to be measured are: turbidity, pH, temperature, specific conductivity and flow. Whenever a surface water contamination incident is suspected to have occurred, samples will be collected and prepared for laboratory analysis.

Note that the DEP Water Quality Certification states that inspections may occur at "reasonable hours and intervals". Clearly this is not acceptable. To date DEP inspections have been inadequate to prevent water quality contamination originating from pipeline construction sites.

I believe that implementation of these 2 recommendations is necessary to insure minimization of adverse impact on the surface waters of Pennsylvania. If DEP is unwilling to follow the advice of the Task Force the department should provide assurances that it can protect the environment.

Organizations such as Trout Unlimited, other non-governmental agencies and, private citizens have taken the responsibility of monitoring the construction project. In order to assist them in their mission I am requesting that DEP

- Publish an up-to-date project schedule that reflects all ongoing field activities and plans for the leading 2 week period, and
- That any planned deviations from the submitted and approved plans be published on an easily accessible format. The changes should include:
 - Water body crossing method

- Sediment and erosion control measures
- Pipeline alignment
- Construction and temporary work zone layouts

I look forward to your response to my comments. Thank-you for the opportunity to participate in the permit review process.