



TOWNSHIP OF SOUTH BRUNSWICK

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March 10, 2017

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE
Room 1A
Washington, DC 20426

Subject: FERC Docket #PF16-5,
Williams Transco Northeast Supply Enhancement Project

Dear Ms. Bose:

On behalf of the Township of South Brunswick, please be advised that the South Brunswick Environmental Commission has reviewed in detail the Transco scoping meeting reply and sections of the draft Resource Reports on the above-referenced project. The primary areas of concern which should be addressed in greater detail in the EIS are noise, safety, environmental releases /emissions and site selection. The specific concerns are as follows:

1. Noise

1.1. Excursions around the Ldn average of 55dBA at the “fence line” may exceed the limit of maximum 50 dBA set by New Jersey state and local municipal code for night time noise at the receiving residential property line. Resource Report 9 does not address maximum sound power levels, only averages. The location of the measurement point must be specified. Noise levels of 55dBA may not meet local code at residential receptors. Even noise levels of 55 dBA can be disturbing when continuous. When comparing to background traffic noise on local roads it should be considered that traffic noise excursions are of short duration and infrequent at night. In addition, local ordinances have requirements for maximum night time sound pressure levels as low as 38 dBA in the highest frequency octave band. Therefore the EIS draft should be very specific about noise levels at the source, fence line and NSAs and should include data from all on site noise generators and include octave band analysis and attenuation projections over the areas that apply in this case. In addition to specifying average noise levels, the maximum level and its duration should be specified. Sub-audible frequencies which may cause vibration at distances and presence of tonal frequencies must also be considered, evaluated and reported. In addition to normal operation, the sequencing of compressors and other equipment, and noise levels during startup and shutdown should be included. If the studies and evaluations do not offer a high safety factor and confidence that there will be no non-compliances or noise disturbances to the residences, then an alternative site further from residential and NSAs should be considered. Draft Resource Report 9 Air Quality and Noise provides no further information or insights into the above issues.

1.2. The same concerns and criteria as 1.1 above should apply to the station and unit blowdowns despite the infrequency. The intensity and duration of blowdowns should be outlined. The data should include empirical measurements from other similar installations as well as the effectiveness of mitigating

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equipment.

2. Safety

2.1. The impact of continued Trap Rock quarry blasting remains a concern. The scoping response advises that blast impact measurements will be taken and incorporated into building and foundation design. In complying with Resource Report #6 requirements, we would also like to see an emphasis on the impact of blasting on the integrity of both existing and new pipe as well. Studies such as the 1994 US Bureau of Mines Siskind study concentrated on pipe integrity. An independent agent should be engaged in measuring the ground vibrations during blasting and evaluating the stresses and strains exerted on existing pipe in the area. The EIS should evaluate the condition of the pipes and the effect of increased pressure on these pipes due to the boost by the compressor in conjunction with the blasting impact. In addition the impact of blasting vibrations on particulate segregation of backfill and potential creation of voids around the pipe may effect pipe integrity. Finally, the impact of vibrations due to blasting on the operations of the compressor station should also be evaluated and reported. Specifically, the impact of vibrations on safety related instrumentation, valves, turbine vibration monitors, etc., should be considered and reported.

2.2. The U.S. Government reported that 715 pipeline incidents were reported in 2015. Although not all of these were related to gas transmission or gas distribution, a significant portion were gas related. Some of the failure modes include: corrosion, incorrect operation, equipment or material failure, natural forces, excavation and unknown causes. Despite the fact that this installation will be built to the current standards, the EIS should explain how feedback and analysis from previous natural gas pipeline incidents such as those reported and the recent Alabama explosion have been taken into account in Station 206 design.

2.3. Draft Resource Report 11, Reliability and Safety, section 11.4 for compressor stations indicates that a Blasting Vibration Analysis will be provided with the application. The concerns outlined in 2.1 should be included for review.

2.4. The EIS should include a Hazard Analysis study specific for this site including all possible failure modes.

2.5. Despite selection of site B which should be evaluated for identification as a High Consequence Area, site A as well should have this designation based on population density.

3. Emissions

3.1. The EIS should discuss the nature and quantity of all liquid materials and waste on site which could potentially be discharged in an equipment failure or spill. These would include distillate in the drain tanks, drums, fuel tanks, liquid ammonia or urea, or any other chemicals. Secondary containment and spill prevention measures should be described in detail.

3.2. The draft EIS should describe a fugitive emissions program to guard against small gas and odorant leaks which might cause a nuisance in the neighborhood. Although emissions estimates in Resource Report 9 are deferred to the application, the Reports seems only to address normal operations and construction. A risk management plan is deemed unnecessary because no materials handled are subject to 40CFR68. We feel that a plan to monitor for fugitive emissions of natural gas is warranted.

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4. Site Selection

4.1. The description under Potential Facility Locations indicates that the facility at site A would be situated on about six acres and would require clearing of approximately 15 acres. The report should include justification for the additional clear cutting of forested area for site B. Information should include the potential for any future expansion.

Thank you for your consideration of these concerns with this project.

Kindly add the South Brunswick Environmental Commission to the stakeholders list, c/o Brian Sullivan, Planning Assistant, South Brunswick Planning Department, 540 Ridge Road, Monmouth Junction, NJ 08852.

Very truly yours,

Frank Gambatese

Frank Gambatese, Mayor

Cc: Township Council
Bernard P. Hvozdovic, Jr., Township Manager
Brian Sullivan, Planning Assistant

Document Content(s)

Mayor letter to FERC w EC comments 3-10-17.PDF.....1-3