



EASTERN SYSTEM UPGRADE

RESOURCE REPORT 12 ***PCB Contamination***

FERC Docket No. CP16-__-000

July 2016

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RESOURCE REPORT 12—PCB CONTAMINATION	
Filing Requirement	Location in Environmental Report
<ul style="list-style-type: none"> For projects involving the replacement or abandonment of facilities determined to have PCBs, provide a statement that activities would comply with an approved EPA disposal permit or with the requirements of the TSCA. (§ 380.12(n)(1)) 	Not Applicable
<ul style="list-style-type: none"> For compressor station modifications on sites that have been determined to have soils contaminated with PCBs, describe the status of remediation efforts completed to date. (§ 380.12(n)(2)) 	Not Applicable

LIST OF ACRONYMS AND ABBREVIATIONS

CERCLIS	Comprehensive, Environmental Response, Compensation, and Liability Information System
Columbia	Columbia Gas Transmission, LLC
EPA	United States Environmental Protection Agency
Hancock CS	Hancock Compressor Station
Highland CS	Highland Compressor Station
hp	horsepower
Huguenot M&R	Huguenot Meter Station
Millennium	Millennium Pipeline Company, L.L.C.
PCB	polychlorinated biphenyl
Project	Eastern System Upgrade
Ramapo M&R	Ramapo Meter Station
Westtown M&R	Westtown Meter Station

12.0 PCB CONTAMINATION

Millennium Pipeline Company, L.L.C. (Millennium) is seeking authorization from the Federal Energy Regulatory Commission (FERC or Commission) pursuant to Section 7(c) of the Natural Gas Act to construct, install, operate, and maintain the Eastern System Upgrade (Project). The Project includes construction of approximately 7.8 miles of 30- and 36-inch pipeline loop in Orange County, New York (Huguenot Loop). Millennium proposes to locate a majority of the pipeline loop overlapping with and adjacent to the permanent easement associated with its existing mainline (Millennium Pipeline). Additionally, as part of the Project, Millennium proposes to construct and operate (1) a new compressor station (Highland CS) in Sullivan County, New York, (2) additional horsepower (hp) at the existing Hancock Compressor Station (Hancock CS) in Delaware County, New York, (3) modifications to the existing Ramapo Meter and Regulator Station (Ramapo M&R) in Rockland County, New York, (4) modifications to the existing Wagoner Interconnect in Orange County, New York and (5) additional pipeline appurtenant facilities at the existing Huguenot Meter Station (Huguenot M&R) and Westtown Meter Station (Westtown M&R) in Orange County, New York. Dependent upon receipt of necessary approvals, construction of the Project would be anticipated to commence in the fall of 2017 to meet a target in-service date in September 2018.

The Project consists of the following components and facilities:

- approximately 7.8 miles of new 30- and 36-inch diameter pipeline looping generally overlapping with and adjacent to Millennium's existing pipeline right-of-way in Orange County, New York;
- construction and operation of a new 22,400 hp compressor station, Highland CS in Sullivan County, New York;
- construction and operation of an additional 22,400 hp at the existing Hancock CS in Delaware County, New York;
- modifications to the Ramapo M&R in Rockland County, New York;
- modifications to the Wagoner Interconnect in Orange County, New York;
- addition of pipeline appurtenant facilities, which includes pigging facilities, at the Huguenot M&R and the Westtown M&R in Orange County, New York; and
- addition of an alternate interconnect to the 16-inch Valley Lateral at milepost 7.6.

Resource Report 12 addresses potential polychlorinated biphenyl (PCB) contamination associated with replacement, abandonment by removal or abandonment in place of facilities determined to have PCBs or modifications to compressor stations on sites determined to have soils contaminated with PCBs.

12.1 PIPELINE FACILITIES

No locations along the existing Millennium Pipeline in the Huguenot Loop area are listed on the U.S. Environmental Protection Agency's (EPA's) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) due to soil contamination with PCBs (EPA, 2016). However, installation of the Huguenot Loop may encounter the Columbia Gas Transmission, LLC's (Columbia's) abandoned A5 Line that is partially located within the existing Millennium permanent easement. The 10- and 12-inch diameter natural gas pipeline was abandoned in place approximately 28 years ago. Millennium anticipates avoiding and leaving the abandoned line in place. However, if the pipeline is encountered, necessary sections will be cut and Millennium will dispose of the pipe in accordance with the Project ECS at an approved disposal facility.

Historically, natural gas pipelines, including portions of Columbia's system, have been subject to monitoring programs addressing PCBs. The EPA monitoring programs were initiated due to the historic use of PCB-containing lubricants in some starting air and instrument air, air compressors, and certain other natural gas facilities, and the potential presence of residual levels of PCBs in natural gas systems after industry-wide clean-up efforts in the late 1980's to early-to-mid 1990s (INGAA, 2010). The A5 Line was abandoned by Columbia in 1988 in accordance with a facilities abandonment plan filed with FERC in September 1988 (Docket Number CP87-339-000), and subsequently reviewed by the EPA. Regulations at the time included disposal of contaminants in a landfill or incinerator permitted in accordance with the provisions of 40 CFR 761.61, or the use of an alternate technology permitted by EPA under an Alternate Disposal Permit as per the provisions of 40 CFR 761.60(e) (INGAA, 2010). Columbia related to Millennium (communication, July 6, 2016) that, in accordance with the applicable regulations, the A5 Line was inspected within 72 hours of being taken out-of-service. The line was inspected in low spots, and at the beginning and end of the pipeline. Where liquids were found, samples were tested for PCBs. Columbia was unable to locate any records of PCB sampling for the section of the A5 Line in the vicinity of the Huguenot Loop. However, Columbia indicated to Millennium that it only maintains historic records for samples that were contaminated with PCBs. Records of clean samples were not retained past the three year timeframe applicable at the time.

12.2 ABOVEGROUND FACILITIES

None of the existing aboveground facilities (i.e., the Hancock CS, Huguenot M&R, Westtown M&R, and Ramapo M&R) are listed on the EPA's CERCLIS due to soil contamination with PCBs (EPA, 2016). PCBs have not been used at Millennium's existing Hancock CS or Minisink CS. Additionally, the proposed site for the new Highland CS is not listed on the EPA's CERCLIS. None of the new or modified aboveground facilities to be constructed as part of the Project are known to contain pipeline liquids with PCBs in excess of 50 parts per million. Therefore, Millennium does not anticipate concerns or impacts associated with PCB contamination. Based on the scope of proposed facilities, no resource report on PCB contamination is required by the Federal Energy Regulatory Commission.

12.3 REFERENCES

- [EPA] – U.S. Environmental Protection Agency. 2016. NEPAassist. EPA Facilities. CERCLIS and TSCA. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx?wherestr=Sullivan+county+New+York>. Accessed on April 13, 2016.
- Interstate Natural Gas Association of America [INGAA]. 2010. White Paper on EPA’s Proposed Changes to the Use Authorization for PCBs in Air Compressor Systems: A Natural Gas Transmission Perspective. <http://www.ingaa.org/File.aspx?id=10755>. Accessed on July 6, 2016.