

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

**In the Matter of the Letter of Notification Application     )**  
**of Dominion Energy Ohio for the PIR #559 High and     )**     **17-1957-GA-BLN**  
**Sunset Pipeline Replacement Project     )**

Members of the Board:

Chairman, Public Utilities Commission	Ohio House of Representatives
Director, Development Services Agency	Ohio Senate
Director, Department of Health	
Director, Department of Agriculture	
Director, Environmental Protection Agency	
Director, Department of Natural Resources	
Public Member	

To the Honorable Power Siting Board:

Please review the attached Staff Report of Investigation, which has been filed in accordance with Ohio Power Siting Board (Board) rules. The accelerated certificate application in this case is subject to an automatic approval process as required by Ohio Revised Code (R.C.) 4906.03 and Ohio Administrative Code 4906-6.

Staff recommends the application for automatic approval on February 27, 2018, unless suspended by the Board, an administrative law judge, or the chairperson or executive director of the board for good cause shown. If suspended, the Board must render a decision on the application within 90 days from the date of suspension.

Please present any concerns you or your designee may have with this case to my office at least four business days prior to February 27, 2018, which is the recommended automatic approval date.

Sincerely,



Raymond W. Strom  
Chief of Siting, Efficiency and Renewables Division  
Rates and Analysis Department  
Public Utilities Commission of Ohio  
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## OPSB STAFF REPORT OF INVESTIGATION

**Case No.:** 17-1957-GA-BLN  
**Project Name:** PIR #559 High and Sunset Pipeline Replacement Project  
**Project Location:** Wayne County  
**Applicant:** Dominion Energy Ohio  
**Application Filing Date:** January 29, 2018  
**Filing Type:** Letter of Notification  
**Inspection Date:** February 12, 2018  
**Report Date:** February 20, 2018  
**Recommended Automatic Approval Date:** February 27, 2018  
**Applicant's Waiver Requests:** none  
**Staff Assigned:** A. Holderbaum, E. Morrison

### Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Conditions

Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

### Project Description

Dominion Energy Ohio (Applicant) proposes to replace approximately 0.95 mile of existing 8-inch diameter pipeline with 1.16 miles of 12-inch pipeline. The replacement pipeline would have a maximum allowable operating pressure of 249 pounds per square inch gauge (PSIG). The pipeline would be installed with a wall thickness of 0.375 inches and would have a minimum yield strength of 52,000 PSIG.

The Applicant would primarily utilize open cut trench construction methods but would utilize horizontal directional drilling (HDD) methods in environmentally-sensitive areas. The existing pipeline would be abandoned in place as the new pipeline replaces it. The Applicant proposes to begin construction in April 2018 and place the line in service by July 2018. The Applicant estimates the total cost of the project at \$1.8 million.

### Site Description

The section of pipeline to be replaced begins at the Applicant's Smucker-Border Station located on Smucker Street in the city of Orrville. The pipeline then travels north along Smucker Street until it turns west on West High Street. The pipeline then turns northwest for the remainder of the route until it comes to an end just south of Davey Farms Road in Green Township. The surrounding land use is a mix of agricultural fields, moderately populated residential properties, and successional woods. The entire length of the replacement pipeline would be located within existing easements owned by the Applicant and public road right-of-way.

## **Basis of Need**

The Applicant identified the 8-inch diameter, 5,000 foot section of pipeline for replacement to alleviate three issues. Because of the existing pipeline's small diameter, transportation capacity of the system is bottlenecked. This limits the Applicant's ability to conduct a complete integrity evaluation. Further, the existing bare steel pipeline has become antiquated. The proposed project would eliminate the bottleneck allowing for increased, more reliable transportation of product to the downstream distribution systems, and allow the Applicant to conduct a more comprehensive evaluation of the affected system's integrity.

Unprotected (bare) steel pipe is steel pipe installed without a protective coating. As opposed to coated steel pipe, unprotected steel pipe is much more likely to suffer damage and corrosion. These destructive forces form weak points in the walls of affected pipe. The Public Utilities Commission of Ohio sanctioned Ohio's four major natural gas utilities to eliminate all hazardous and obsolete piping. To comply with this, the Applicant developed a 25-year plan called the Pipeline Infrastructure Replacement (PIR) program. The Applicant identified this project as a qualifier for the PIR program due to the elimination of approximately 4,985 feet of 8-inch bare steel piping, and replacing it with approximately 6,100 feet of 12-inch coated steel main.

## **Nature of Impacts**

### *Socioeconomic Impacts*

The replacement pipeline would intersect three roads. The Applicant proposes to utilize either open cut trenching or horizontal directional drilling at each road crossing. The Applicant will submit construction plans to the City of Orrville for the appropriate road crossing and temporary driveway construction-related permits and will coordinate temporary road closures, if required, with the city.

The Applicant sent notification about the project to area public officials and affected property owners. Existing public roadways, private roadways, and the existing right-of-way would provide the required equipment access during construction. Laydown areas would be determined by the contractor awarded the project, and the Applicant stated that it will file in this docket their locations as late-filed information. The Applicant stated that it will ensure that all property owners and tenants have access to their residences and/or property during construction.

### *Agricultural Land*

The proposed construction of the pipeline will intersect with the Davey Farms, Inc. agricultural area located at 9829 Rohrer Road. This area is designated as an Agricultural District in Green Township. The Applicant and the affected landowners will negotiate fair compensation for crop loss during the construction of the pipeline. The Applicant will segregate soils during trenching activities and will backfill around the installed pipeline to the original condition.

### *Cultural Resources*

The Applicant completed a cultural resources literature review for the area of potential effects for the project. No previously recorded archaeological or historical features were found within or adjacent to the project area.

### *Surface Waters*

The project area contains two intermittent streams. The Applicant states that both streams will be crossed via horizontal direction drill and therefore no impacts to these resources are anticipated. The project area does not contain any wetlands or ponds.

The HDD process has a risk of an inadvertent return of drilling lubricant, or frac-out. An inadvertent return occurs when the drilling lubricant, typically a non-toxic, fine clay bentonite slurry, is forced through cracks in bedrock and surface soils. Staff recommends that, prior to construction, the Applicant provide a frac-out contingency plan detailing monitoring, environmental specialist presence, containment measures, clean-up, and restoration in the event of an inadvertent return.

The Applicant prepared and submit a Storm Water Pollution Prevention Plan for the project to the Wayne County Soil and Water Conservation District (SWCD) on October 2, 2017 and received approval from the Stark County SWCD on November 22, 2017. The Applicant has submitted a Notice of Intent for coverage under the Ohio Environmental Protection Agency General National Pollutant Discharge Elimination System Permit. The Ohio Environmental Protection Agency authorized the permit on October 10, 2017. Hydrostatic testing would be necessary for this project. The Applicant stated that it will submit to the OEPA for a Hydrostatic Test Water Discharge Notice of Intent one month prior to conducting hydrostatic testing, and will submit the approved permit to Staff once received.

### *Threatened and Endangered Species*

The state and federal listed species and/or their suitable habitat that may be found in the project area include the state and federal endangered Indiana bat (*Myotis sodalis*) and the federal threatened northern long-eared bat (*Myotis septentrionalis*). Applicant states tree clearing would be necessary during construction of the proposed pipeline. The U.S. Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) recommend that removal of any trees greater than three inches in diameter only occur from October 1 through March 31, unless coordination with the ODNR and the USFWS allows a different course of action. The Applicant has committed to conducting all tree clearing during the seasonal clearing window from October 1 through March 31.

The project is within the range of the federally threatened and state endangered eastern massasauga (*Sistrurus catenatus*), the state endangered American bittern (*Botaurus lentiginosus*), the state endangered sandhill crane (*Grus canadensis*), the state endangered trumpeter swan (*Cygnus buccinator*), and the state threatened lake chubsucker (*Erimyzon sucetta*). Due to the location of the project, the habitat at the project site and within the vicinity of the project area, the type of work proposed, and the fact that no in-water work is proposed for the project, no impacts to these species are anticipated.

### **Conclusion**

Staff's review of the application included consideration of the requirements listed in R.C. 4906.10. Based on Staff's review, the application meets the necessary criteria for granting a certificate. Staff recommends automatic approval of this application on February 27, 2018, provided that the following conditions are satisfied:

## **Conditions**

- (1) Prior to the commencement of construction activities in areas that require permits or authorizations by federal or state laws and regulations, the Applicant shall obtain and comply with such permits or authorizations. The Applicant shall provide copies of permits and authorizations, including all supporting documentation, to Staff within seven days of issuance or receipt by the Applicant.
- (2) Prior to construction, the Applicant shall submit to Staff, for review and confirmation that it complies with this condition, a project construction plan that provides the specific locations of its laydown areas and is responsive to the ODNR concerns about state listed species and ecological areas of significance. If the specific laydown locations chosen appear to have additional adverse impacts, the Applicant shall either propose different specific locations without such impacts, or refile its application.
- (3) Damage to lawns, driveways, and parking areas as a result of this project shall be restored to original conditions upon completion of construction, and subsequently monitored for settling, cracking and sinking during operation of the facility. Unless otherwise directed by the property owner, concrete panels (if applicable) shall be replaced in their entirety rather than cut and patched.
- (4) The Applicant shall maintain traffic along public roadways and shall maintain access for adjacent land uses during construction.
- (5) Prior to construction the Applicant shall provide to Staff for review a frac-out contingency plan detailing monitoring, environmental specialist presence, containment measures, clean-up, and restoration.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/20/2018 3:00:06 PM**

**in**

**Case No(s). 17-1957-GA-BLN**

Summary: Staff Report of Investigation electronically filed by Adam Bargar on behalf of Staff of OPSB