

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

**In the Matter of the Expedited Construction Notice)
Application of Dominion Energy Ohio for the PIR 2428) 18-0515-GA-BNR
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 April 24, 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 April 24, 2018, which is the recommended automatic approval date.

Sincerely,

Rustrom

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OPSB STAFF REPORT OF INVESTIGATION

Case No.: 18-0515-GA-BNR
Project Name: PIR 2428 Pipeline Replacement Project
Project Location: Summit County
Applicant: Dominion Energy Ohio
Application Filing Date: April 2, 2018
Filing Type: Expedited Construction Notice
Inspection Date: April 16, 2018
Report Date: April 17, 2018
Recommended Automatic Approval Date: April 24, 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 0.45 mile of existing 8-inch and 12-inch diameter pipeline with 12-inch pipeline. The replacement pipeline would have a maximum allowable operating pressure of 225 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 42,000 PSIG.

The Applicant would utilize horizontal directional drilling (HDD) for the entire length of the replacement pipeline. The existing pipeline would be abandoned in place. The Applicant proposes to begin construction in June 2018 and place the line in-service by September 2018. The Applicant estimates the total cost of the project at \$1,052,000.

Site Description

The section of pipeline to be replaced begins approximately 1,400 feet west of Cuyahoga Street within the Summit Metro Park in Summit County. The pipeline will then extend west via HDD 0.45 mile to the tie in point approximately 200 feet east of Woodsvie Drive. The entire length of the replacement pipeline would be located within existing easements owned by the Applicant. The surrounding land use consists of maintained lawns, open field, and forest. Temporary easements would be required from adjacent property owners for laydown areas.

Basis of Need

The Applicant identified 963 feet of tar wrapped steel, 12-inch pipeline and 1,306 feet of bare steel, 8-inch pipeline for replacement for the following reasons: the existing pipeline's varying diameter, the continued modernization of the affected system, and a persistent leak history.

Varying diameter in a pipeline system inhibits integrity management evaluation and adds variables to predicting flow patterns. Antiquated pipeline facilities, in this case specifically, consist of inferior, aging material and outdated sizing. These diminish the confidence of being able to reliably supply the downstream markets. For the safety of the community and efficiency of delivery, leaking natural gas pipeline need to be evaluated for replacement. This particular section of pipe exhibits a concerning pattern of leakage history.

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 authorized Ohio's four major natural gas utilities to eliminate hazardous and obsolete piping. To implement 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.

The proposed 12-inch, weld treated pipeline would alleviate the aforementioned issues. The varying diameter would be eliminated 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. Also, the antiquated material would be replaced with material consistent with modern standards significantly reducing the likelihood of leakage.

Nature of Impacts

Socioeconomic Impacts

The replacement pipeline would not intersect any roads. The Applicant sent notification about the project to area public officials and affected property owners. Temporary easements would be required from adjacent property owners for laydown areas. Two properties on Woodsvie Drive would be impacted by construction activities. The closest residence is located approximately 323 feet from the west portion of the proposed project.

Cultural Resources

The Applicant completed a cultural resources literature review for the area of potential effects for the project. The literature review found four previously recorded cultural resources: The Valley Railway Historic District, which includes the Cuyahoga Valley Scenic Railroad, the Ohio and Erie Canal Towpath Trail, and the Ohio and Erie Canal. The historic district is managed by the Cuyahoga Valley National Park. The Applicant coordinated the design of the railroad crossing with the Cuyahoga Valley National Park. The Park Planner for the Cuyahoga Valley National Park responded on March 14, 2018 with a finding of no impacts to the historic district or scenic railroad. The Ohio and Erie Canal and Towpath Trail will be crossed underneath via HDD. To ensure no adverse impacts to cultural resources occur, Staff recommends the Applicant submit the results of the literature review to the Ohio Historic Preservation Office prior to the commencement of construction.

Surface Waters

The project area contains one perennial stream, the Cuyahoga River, one open water resource, the Ohio and Erie Canal, three Category 1 wetlands and two Category 2 wetlands. All resources except for the two Category 2 wetlands would be crossed by the proposed pipeline via HDD. No impacts to these resources are anticipated. Two wetlands would be temporarily impacted during construction resulting in 0.05 acre of impacts.

Although the HDD process would be used to avoid direct impacts to the resources, the process has a risk of an inadvertent return of drilling lubricant, commonly known as 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. The Applicant developed 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 submitted the frac-out contingency plan to the Summit County Soil and Water Conservation District, as part of its Stormwater Pollution Prevention Plan (SWPPP), on February 28, 2018. The SWPPP was approved by the county on March 19, 2018.

The Applicant stated that it will submit a Notice of Intent for coverage under the Ohio Environmental Protection Agency General National Pollutant Discharge Elimination System Permit to the Ohio Environmental Protection Agency prior to construction. Temporary wetland impacts would be covered under Permit #12 from the U.S. Army Corps of Engineers without the need to submit a pre-construction notification. The Applicant submitted an application for a Section 10 permit from the U.S. Army Corps of Engineers on February 28, 2018 in order to cross underneath the Cuyahoga River via HDD.

Threatened and Endangered Species

The project area is within the range of the state and federal endangered Indiana bat (*Myotis sodalis*) and the federal threatened northern long-eared bat (*Myotis septentrionalis*). As tree roosting species in the summer months, the habitat of these species may be impacted by the project. In order to avoid impacts to the Indiana bat and the northern long-eared bat, the Ohio Department of Natural Resources (ODNR), the U.S. Fish and Wildlife Service, and Staff recommend the Applicant adhere to seasonal tree cutting dates of October 1 through March 31 for removal of any trees greater than or equal to three inches in diameter. The Applicant stated that no tree clearing would be required for this project. No impacts to these species are anticipated.

The Applicant is currently coordinating with the ODNR for any additional state-listed species and/or suitable habitat that may be found in the project area. The Applicant would provide Staff with any comments from the ODNR review of the project and continue coordination with the ODNR and Staff based on the ODNR comments.

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 April 24, 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 Ohio Department of Natural Resources (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) Prior to the commencement of construction, the Applicant shall obtain a coordination letter from the ODNR in regards to impacts to state and federal listed species and/or their suitable habitat, and shall coordinate with the ODNR and with Staff regarding compliance with the letter.
- (4) Prior to construction, the Applicant shall coordinate with the Ohio Historic Preservation Office with regards to the findings and recommendations of the cultural resources literature review to verify that further Phase I field work is not required for the protection of cultural resources along the project route including at bore entry and exit locations.

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Case No(s). 18-0515-GA-BNR

Summary: Staff Report of Investigation electronically filed by Mr. Matt Butler on behalf of Staff of OPSB