

  
**Curtin & Heefner** LLP  
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CELEBRATING OVER 80 YEARS

MARK L. FREED  
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August 10, 2018

Rosemary Chiavetta, Esquire  
Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Repurposing of Sunoco Pipeline, L.P.'s Point Breeze-Montello Line**

Dear Secretary Chiavetta:

This firm is solicitor to Uwchlan Township, Chester County. We are writing to express the Township's concerns regarding Sunoco Pipeline, L.P.'s plan to repurpose the existing Point Breeze-Montello pipeline to convey hazardous liquids through Uwchlan Township in an easterly direction. The Point Breeze-Montello pipeline was built in the 1930's and was previously used to convey refined petroleum products in the westerly direction. In 2014, the Pipeline and Hazardous Materials Safety Administration (PHMSA) warned "of the potential significant impact [that] flow reversals, product changes and conversion to service may have on the integrity of a pipeline. Failures on natural gas transmission and hazardous liquid pipelines have occurred after these operational changes." 79 FR 56121. Unlike the route of the Point Breeze-Montello pipeline in other areas, in Uwchlan Township the route of the pipeline diverges significantly from the route of the existing Mariner East 1 pipeline, thereby exposing many additional neighborhoods, schools and businesses to the risks associated with hazardous liquids pipelines. In particular, the Point Breeze-Montello pipeline runs under or near Lionville Park, the Lionville Middle School, the Lionville YMCA, Downingtown East High School, the Shamona Creek Elementary School and the Marsh Creek Sixth Grade Center. Lionville Middle School is sandwiched between the Point Breeze-Montello pipeline and the Mariner East pipeline.

In addition to the general concerns regarding the repurposing of the Point Breeze-Montello pipeline, the Township seeks answers to the following questions:

- Sunoco has reported that the Point Breeze-Montello line is a 12-inch pipeline. However a map that appears to notate some of Sunoco's pipelines identifies the Point Breeze-Montello line as an 8-inch line. See attached. Is the pipeline 12 inches or 8 inches?

Rosemary Chiavetta, Esquire  
Secretary – PA Public Utility Commission  
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- By letter dated July 26, 2018, to Senator John Rafferty, Jr., the PUC advised that Sunoco filed a “construction notice” with the PUC and PHMSA. PHMSA “strongly” encourages operators “to submit a comprehensive plan to the appropriate PHMSA regional office prior to performing flow reversals, product changes and conversions to service.” 79 FR 56121. Did Sunoco comply with PHMSA’s strong recommendation and submit such a comprehensive plan?
- PHMSA advises that, even with a new hydrostatic pressure test “it may not be advisable to perform flow reversals, product changes or conversion to service” for, among other things, “LF-ERW pipe, lap welded, unknown seam types and with seam factors less than 1.0 as defined in §§ 192.113 and 195.106.” 79 FR 56122. Has Sunoco confirmed the types of welds and seams on the Point Breeze-Montello line? If so, would you please identify the types of welds and seams on the pipeline?
- PHMSA’s 2014 Guidance for Pipeline Flow Reversals, Product Changes and Conversion to Service provides that “Public Awareness programs need to be modified for the changing product and associated risks, and additional notification may be required prior to change § 195.440.” (p. 14). Has Sunoco modified its Public Awareness program? If so, would you please provide us with the details of the program?
- PHMSA’s 2014 Guidance also provides that “Operators need to update their risk analysis and identify the need for additional or modified preventative and mitigative (P&M) per § 195.452(i)(iii).” (p. 14). Has Sunoco taken this action?

We are also in receipt of the July 20, 2018 letter from West Whiteland Township to the PUC and PHMSA posing additional important questions. Copies of those letters are attached hereto. We also request answers to the questions posed by West Whiteland Township.

We ask that the PUC consider the Township’s concerns and respond to the questions posed herein before allowing the repurposing of the Point Breeze-Montello pipeline to proceed.

Very truly yours,

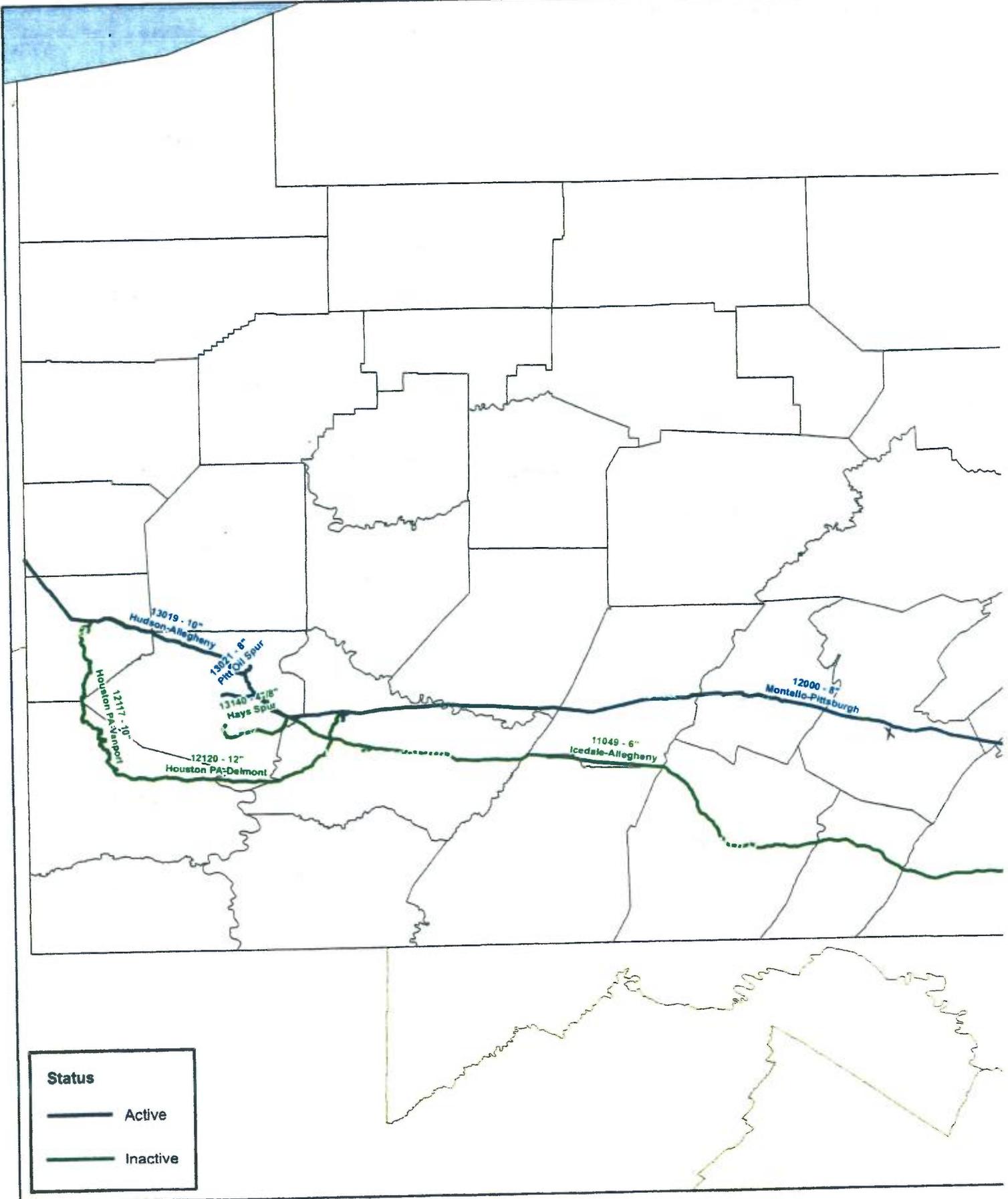


Mark L. Freed  
For CURTIN & HEEFNER LLP

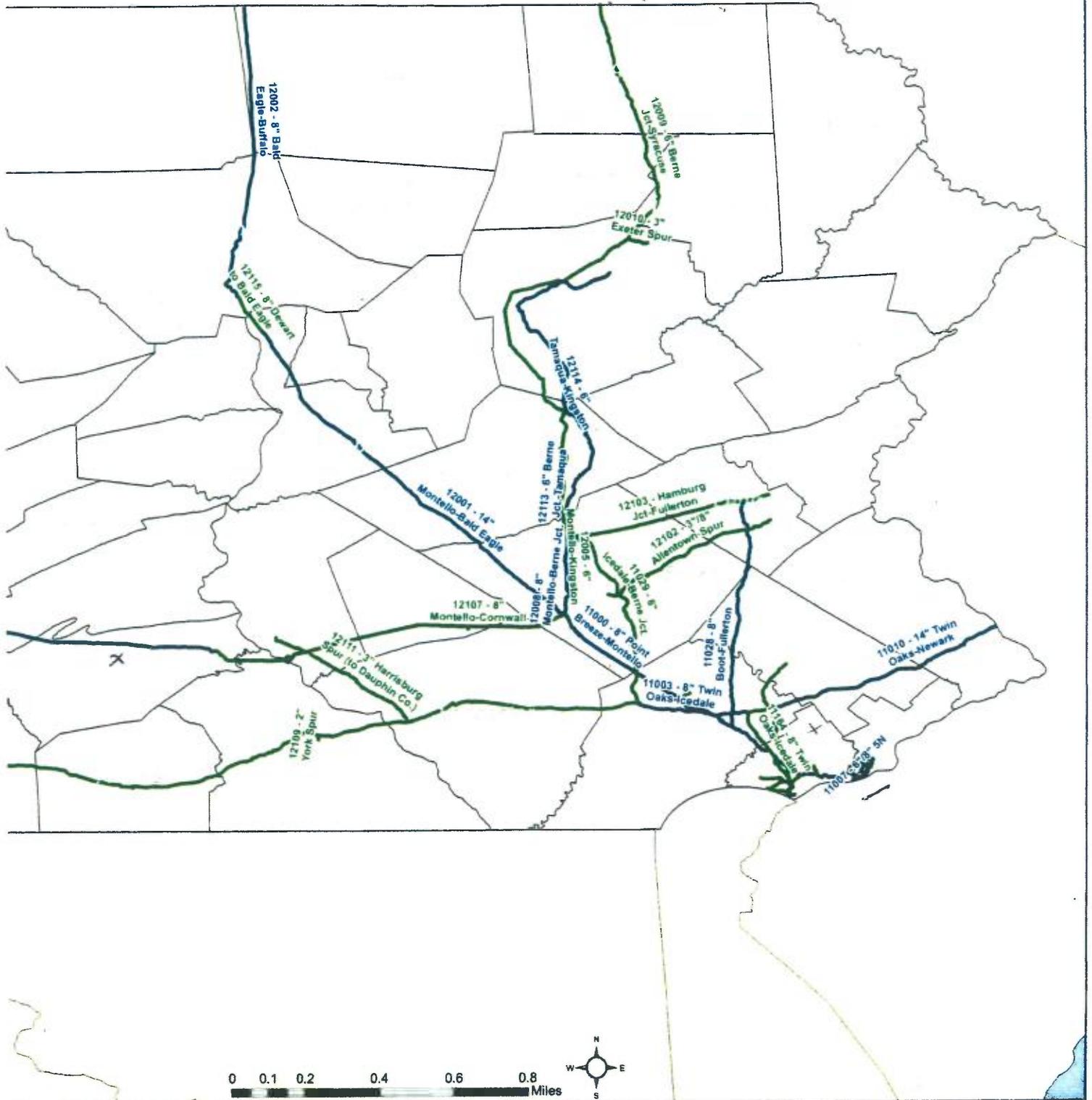
Enclosures

Exhibit A – Map of Sunoco Logistics L.P. Inactive Pennsylvania Pipelines  
Exhibit B – July 20, 2018 letters from West Whiteland Township to PUC and PHMSA

# Sunoco Logistics Pennsylvania



# Partners L.P. Pipelines





101 Commerce Drive  
Exton, Pennsylvania 19341

Tel: (610) 363-9525  
www.westwhiteland.org

July 20, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: Repurposing of Sunoco Pipeline L.P.'s 12" pipeline to carry natural gas liquids

Dear Secretary Chiavetta,

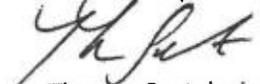
We are writing to express our questions and concerns about Sunoco Pipeline's plans to repurpose an existing 12-inch pipeline to carry natural gas liquids across Pennsylvania to their refinery in Marcus Hook. This pipeline was built in the 1930's and crosses the length of West Whiteland Township through busy commercial areas and numerous residential neighborhoods. On behalf of our community, we are seeking reassurance that if this pipeline is permitted to transport highly volatile liquids, it will be safe to operate so close to homes, businesses and gathering places.

In particular, we seek answers to the following questions:

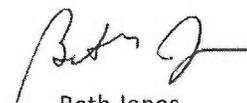
- What approvals does Sunoco Pipeline need from the Public Utility Commission to repurpose this pipeline to carry natural gas liquids?
- Is Sunoco required to provide any public notice to the residents in the communities in which the repurposed pipeline is located about this proposed change before it is approved?
- Will Sunoco be required to upgrade some or all of this pipeline before it is permitted to convey natural gas liquids through it?
- Could an overview be provided of the steps to be taken by Sunoco and regulators to ensure an 80+ year old pipe, designed to carry petroleum products at low pressure, is capable of sustaining the increased operating pressure associated with the natural gas liquids and will operate safely?
- How old is the actual pipe in the ground? In other words, how long has it been since the segments in West Whiteland Township have been replaced?
- Is this 12" pipeline the same pipeline that recently leaked petroleum into Darby Creek near the Philadelphia Airport?
- What requirements does Sunoco have to report any approved changes to the Pennsylvania One Call System and emergency responders?

We would appreciate the PUC's assistance in understanding what requirements are in place to ensure the safety of this pipeline and how the PUC monitors compliance.

Sincerely,  
West Whiteland Township  
Board of Supervisors

  
Theresa Santalucia  
Chairman

  
Michele Moll  
Vice-Chairman

  
Beth Jones  
Member



101 Commerce Drive  
Exton, Pennsylvania 19341

Tel: (610) 363-9525  
www.westwhiteland.org

July 20, 2018

Howard Elliott, Administrator  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Repurposing of Sunoco Pipeline L.P.'s 12" pipeline to carry natural gas liquids

Dear Mr. Elliott,

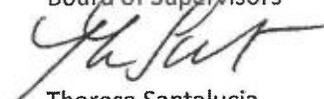
We understand that Sunoco Pipeline, LP has notified PHMSA of their plans to repurpose an existing 12-inch pipeline to carry natural gas liquids across Pennsylvania to their refinery in Marcus Hook, PA. This pipeline was built in the 1930's and crosses the length of West Whiteland Township through busy commercial areas and numerous residential neighborhoods. On behalf of our community, we are seeking reassurance that if this pipeline is permitted to transport highly volatile liquids, it will be safe to operate so close to homes, businesses and gathering places.

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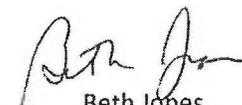
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