

July 13, 2021

Sent by First Class Mail and Email

Murrysville Planning Commission
4100 Sardis Road
Murrysville, PA 15668

Re: Titan to Bollinger Pipeline

Dear Commission Members,

We are writing on behalf of the members of our organization, Protect PT (Penn-Trafford), a nonprofit citizens group dedicated to ensuring the safety, security, and quality of life by engaging in education and advocacy in Westmoreland and Allegheny counties. Our members residing in Murrysville and every resident of Pennsylvania have a constitutional right to “clean air and pure water... for generations yet to come” under Article 1 Section 27 of the Pennsylvania Constitution. The residents of Murrysville ask the Planning Commission to consider these factors when allowing development for the Titan to Bollinger Pipeline with permit number ESG076521004-00 from the client Hyperion Midstream LLC. The construction of the pipeline could repeat the historical landslide activity in the area, increase ambient radon and arsenic levels, and contaminate High-Quality Waters-Cold Water Fishes (HQ-CWF) streams and wetlands; simultaneously threatening the public health and vitality of Southwestern PA residents and the environment.

Landslide Susceptibility

According to the Geohazard Letter drafted by Civil and Environmental Consultants (CEC), a “majority of the project site is in areas documented to be at least prone to landslides,” and a “small portion of the proposed access roads are located within a documented ‘old landslide’ in the central and eastern portions of the pipeline.”¹ The site specific Erosion and Sediment Control Report² emphasizes that newly constructed slopes could become unstable if not properly remediated during earthwork construction. A majority of the soils present in this region are easily erodible and have low strength such as FairPoint, Gilpin, and Wharton soils. According to an evaluation of Westmoreland county soils, all three of these soils are landslide-prone, and special precautions would be needed to be taken to prevent slope failures and improper construction practices³. Because there are areas where slopes are within 33% (3H:1V) to 50%

¹ Civil & Environmental Consultants Geohazard Letter, CEC Project 193-847
https://drive.google.com/file/d/1z-YMOgXdJ9HU9gOpA3gJDLJBnNl_vjTT/view

² Erosion and Sediment Control Report, CEC Project 193-847
https://drive.google.com/file/d/1EZhdSbtbla_hf6CS5rtw58s4bqXEI6rq/view?usp=sharing

³ Westmoreland County Soils, Limiting Soil Characteristics
https://files.dep.state.pa.us/programintegration/PA%20Pipeline%20Portal/MarinerEastII/SWRO/03%20E&S%20Plan/Attachment%205%20Soils/Table%201_Limiting%20Soils.pdf

(2H:1V) to even areas of a slope greater than 50%, the CEC denotes these topographic locations as potentially dangerous since the topsoil is so weak. Pipeline failures as a result of landslide activities can result in significant leaks that disrupt the environment and generate permanent ground displacements across the pipeline⁴. This landslide activity can invariably occur in the event that organic soils are removed naturally through erosion or through human activity-- and since pipelines are long and linear in nature-- they often cross areas susceptible to landslides⁵, which has been confirmed by the Geohazard Letter and other documentation regarding permit ESGO76521004-00.

Additionally, CEC's engineering history of projects for Olympus Energy, LLC formerly Huntley and Huntley has resulted in several violations over the few years of operation that the operator has undergone. These erosion and sedimentation violations, including one landslide incident, calls into question the reliability of CEC's scientific and engineering review of the proposed construction area for this project. See attachment A.

Radioactivity

Westmoreland County is already at intermediate potential risk for radon in indoor air according to the [US EPA Map of Radon Zones](#), and while CEC anticipates that the rock and soils at the proposed site will not contain elevated levels of radioactivity, higher than background levels of radon can occur by old mines due to radon migration⁶. Since radon transport is controlled by the permeability of the ground, any available cavity can accumulate with radon, and Wharton, Gilpin, and Fairpoint soils are moderately permeable. Radon exposure has been found to be the second leading cause of lung cancer after smoking in the United States. Stations 0+00 through 17+00 outlined in the Geohazard Letter are within a previously strip-mined location, which will put them at risk for these elevated levels of radon in addition to arsenic, which has been outlined in the Geohazard Letter to be potentially encountered species in reclaimed strip mine locations. Stations 17+00 to 19+00 were documented to be within an old landslide region, and CEC has cited areas in documented old landslides or areas of instability to be potentially hazardous locations. Therefore, 0+00 to 17+00 and 17+00 to 19+00 are dangerous for these reasons.

Additionally, acid-producing rock has not been anticipated to be encountered, however, in their Geohazard Letter, CEC states that whether or not coal or carbonaceous shale at the sites will produce acidic runoff cannot be determined by visual inspection. Thus it is not impossible that acid-producing rock will not be encountered, especially near old strip mines, such as sites 0+00 to 17+00.

⁴ Marinos, V.; Stoumpos, G.; Papazachos, C.. "Landslide Hazard and Risk Assessment for a Natural Gas Pipeline Project: The Case of the Trans Adriatic Pipeline, Albania Section" *Geosciences*, **2019**, 9, no. 2: 61. <https://doi.org/10.3390/geosciences9020061>

⁵ Baum, R.; Galloway, D.; Harp, E.; "Landslide and Land Subsidence Hazards to Pipelines" *USGS Open File Report*, **2008**, 1164. https://pubs.usgs.gov/of/2008/1164/pdf/OFo8-1164_508.pdf

⁶ Wysocka, M.; Skubacz, K.; Chmielewska, I.; Urban, P.; Bonczyk, M.; "Radon migration in the area around the coal mine during closing process" *International Journal of Coal Geology*, **2019**, 212, 103253. <https://doi.org/10.1016/j.coal.2019.103253>

HQ-CWF Contamination

The CEC also cites locations near water sources such as streams and wetlands as potentially hazardous locations for the Titan to Bollinger pipeline. According to the PCSM report⁷, there are two wetlands within the delineation boundary, totaling 0.369 acres of wetland. Additionally, three streams – two of which are ephemeral and one intermittent – total 196 linear feet of HQ-CWF designated water as they drain into the Turtle Creek Watershed. According to a ProPublica report⁸, since 1986, pipeline accidents have “killed more than 500 people, injured over 4,000, and cost nearly seven billion dollars in property damage.” Pipelines can be broken because of natural disasters, corrosion, natural deterioration, or even mistakes by workers, and when this happens, leaks can threaten the lives of those in Murrysville. Pipeline construction may impact the streams and wetlands by increasing soil erosion, diminishing fish and macroinvertebrate water quality by removal of vegetation, increased sedimentation, and disturbance of substrates, water flow patterns from the excavation, compaction and disturbance of soils, and alteration of the geology which can lead to landslides. Additionally, petroleum products may enter the waterways, and exposed rocks could leach acid or metals into the waterways. Pipeline activity can, therefore, impact the surface and groundwater resources and can be long-term and lasting.

Pennsylvania already has faced major issues with the Mariner East II and Rover Pipelines, which both experienced significant water quality issues “related to the spilled drilling fluid during horizontal drilling, which contaminated streams and wetlands.”⁹ A total of 97 NOVs and 125 IRs through summer 2019 were issued to the Mariner East Pipeline, and 52% and 40% of the IRs were as a result of violations on stream and wetland quality, and there have been many complaints about drinking water quality, as well.

Protect PT does not anticipate that the Titan to Bollinger pipeline operated by Hyperion Midstream will have any positive impact on our environment. Its construction will follow its predecessor pipelines who have faced many violations, fail to protect the environment, and endanger Pennsylvanians. We urge that you terminate permit number ESG07521004-00 before its construction begins and puts the residents of Murrysville directly at risk.

Sincerely,



Gillian Graber
Executive Director

⁷ Hyperion Act 167 Verification Report, CEC Project 193-847.

<https://drive.google.com/file/d/1UxMaLziOsy2aAkbnBqGSx5KrCmvbsaYO/view?usp=sharing>

⁸ Groeger, Lena. “Pipelines Explained: How Sure are America’s 2.5 Million Miles of Pipelines?” ProPublica. Nov. 15, 2021.

<https://www.propublica.org/article/pipelines-explained-how-safe-are-americas-2.5-million-miles-of-pipelines>

⁹ Betcher, M.; Hannah, A.; Hansen, E.; Hirschman, D.; “Pipeline Impacts to Water Quality: Documented Impacts and Recommendations for Improvements” Aug. 21, 2019.

<https://www.downstreamstrategies.com/wp-content/uploads/2019/10/Pipeline-Water-Quality-Impacts-FINAL-8-21-2019.pdf>