

Blue Ridge Environmental Defense League

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Chief Barry Overman

President

North Carolina State Firefighters' Association

3101 Industrial Drive Suite 200

Raleigh, North Carolina 27609

VIA EMAIL

Re: Pipeline Safety Concerns, Proposed Atlantic Coast Pipeline

Dear Chief Overman:

I write to express concerns and share information regarding the proposed Atlantic Coast Pipeline (ACP). The ACP potentially impacts 8 Eastern North Carolina counties: Halifax, Northampton, Nash, Wilson, Johnston, Cumberland, Sampson and Robeson. Many of our members, their neighbors, friends and family live within the “blast zone” of the Atlantic Coast Pipeline. These counties are served by excellent fire departments, many of them volunteer. Having been involved in a volunteer fire department as a wife for almost 40 years, and as the mother of the current Chief of a volunteer department, I am well aware of the commitments to service and training that rural firefighters make, and the challenges that the ACP may present to our rural departments.

In June, I attended a presentation given by the ACP to the Johnston County Local Emergency Planning Committee. Instead of providing important details on pipeline safety and emergency response, the company’s representatives only provided general information which can be found in their public relations materials. From speaking with others that attended LEPC meetings in their communities, the Johnston County meeting was not unique.

Additionally, in speaking with local and state officials, regulatory agencies and others, they have not been provided with information regarding disparities in pipeline construction and maintenance in rural communities. There are significant differences in pipeline materials, cover thickness, testing and monitoring between rural and urban areas. In their regulations, the Pipeline and Hazardous Safety Materials Safety Administration (PHMSA) defines four different pipeline “classes”:

Class 1: Contains 10 or less dwelling units

Class 2: Contains more than 10, but less than 46 dwelling units

Class 3: Contains 46 and above dwelling units

Class 4: Is a class location unit where four-story above-ground dwelling units are located

In North Carolina, all but 1.31 miles of the proposed route are designated Class 1 and 2. Mostly Class 1.¹ Steel used to construct the pipeline is thinner, the shut-off valves are allowed to be further apart, and leakage surveys are only required every 15 months:

Pipeline	Thickness	Daily Weld Tests	Leakage Surveys
Class 1	0.375”	10% of welds must be tested	Every 15 months, but once per calendar year
Class 2	0.45”	15% of welds must be tested	See above
Class 3	0.54”	In Class 3 and 4 butt welds must be tested at major navigable water crossings, railroad or highway rights-of-way, 100% unless impractical; then 90%	Every 7 ½ months, twice per calendar year of no odorant is added
Class 4	0.675” Approximately 75% heavier than Class 1		Every 4 ½ months, 4 times per calendar year if no odorant is added

¹ Source: Federal Energy Regulatory Commission “Atlantic Coast Pipeline and Supply Header Project” Final Environmental Impact Statement, Volume 1, pages 4-580 and 4-581

There are also significant differences in soil and rock used as cover for pipelines in rural and urban areas. This is of concern considering the large amount of agricultural and forest land that the proposed pipeline would cross, with the attendant potential for damage from heavy equipment. Class 1 locations are only required to be covered with 36” of normal soil or 18” of rock- as opposed to 36” of normal soil and 24” of rock in Class 2, 3, and 4.

Pipeline accidents can cause injury, property damage and death. While industry likes to minimize the dangers by placing the blame on older construction, the opposite is true. Studies show that pipelines built in the 2010s are failing at a rate higher than those constructed prior to the 1940s.²

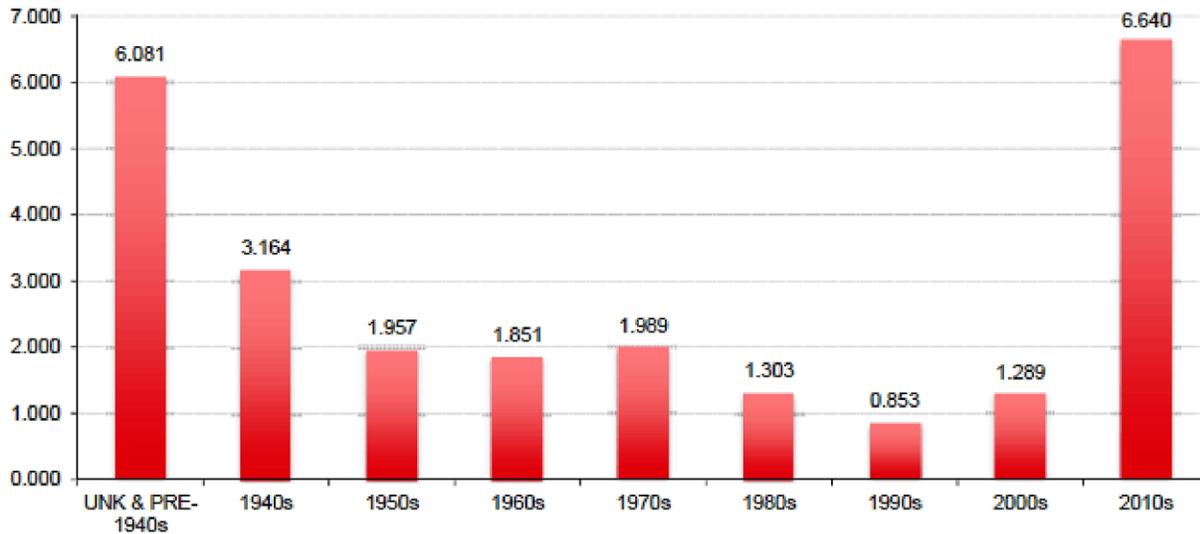
TABLE 4.12.2-1
Natural Gas Transmission Pipeline Significant Incidents by Cause (1997-2016) ^a

Cause	Number of Incidents	Percentage
Corrosion ^b	317	23.9
Excavation	204	15.3
Pipeline material, weld, or equipment failure	376	28.3
Natural force damage	149	11.2
Outside Force ^c	86	6.5
Incorrect operation	44	3.3
All other causes ^d	153	11.5
TOTAL	1,329	100

^a All data gathered from PHMSA Serious Incident files, April 28, 2017.
^b Includes third-party damage.
^c Fire, explosion, vehicle damage, previous damage, intentional damage.
^d Miscellaneous causes or other unknown causes.
Source: PHMSA, 2016.

² Sources: United States Pipeline and Hazardous Materials Safety Administration, Pipeline Safety Trust

Average number of annual incidents over 2005-2013 per 10,000 miles of onshore gas transmission pipe by decade of pipe installation



As of March 2015.
Sources: U.S. Pipeline and Hazardous Materials Safety Administration, Pipeline Safety Trust

(Hard copy of article attached to email) <https://www.snl.com/interactiveX/article.aspx?CDID=A-33791090-11060&ID=33791090&Printable=1>

This is a link to a YouTube video taken by a news crew after an explosion in 2016. It shows the devastation that a 30” pipeline wrought on this rural neighborhood in Pennsylvania:

<https://www.youtube.com/watch?v=ZkEXfa2AMY0>

It is unacceptable that our rural North Carolina communities are being endangered in this way, and that decision makers have not been provided with accurate data concerning the very real dangers posed by the ACP. Our firefighters across the state put their lives on the line every time the alarm sounds, and they deserve to have *all* of the facts regarding the ACP. Thank you for your service and for your attention to this serious matter.

Sincerely,

Therese Vick

North Carolina Healthy, Sustainable Communities/Coal Ash Campaign Coordinato