



ENVIRONMENTAL CONSULTANTS

Sound Science. Creative Solutions.®

8 Science Park Road, 2nd Floor
Scarborough, Maine 04074
www.swca.com

April 5, 2021

Karon Skinner Catrone, Conservation Agent
Conservation & Stormwater Management
Westwood Town Hall
50 Carby Street
Westwood, MA 02090

**Re: Algonquin Gas Transmission, LLC
I-1 Pipeline Anomaly Investigation at Milepost 16.21
Utility Maintenance Notification to Conservation Commission**

Dear Ms. Catrone:

Algonquin Gas Transmission, LLC (Algonquin) operates an existing interstate natural gas transmission system pursuant to the Natural Gas Act, 15 United States Code (USC) 717 *et seq.* and the Natural Gas Pipeline Safety Act, 49 USC 60101 *et seq.* As part of its obligation under federal law to maintain the safety and reliability of its facilities, Algonquin is required by U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration Regulations (Chapter 49 of the Code of Federal Regulations Section 192 Department of Transportation Regulations for "Transportation of Natural and other Gas by Pipeline") to routinely monitor its pipelines for segments which require attention and address issues in a timely fashion in order to protect the public and to ensure Algonquin's compliance with federal pipeline safety regulations.

Algonquin monitors its natural gas pipeline transmission systems through regularly scheduled in-line inspections (ILI) using internal pipeline inspection tools commonly known as "pigs." These internal pipeline tools perform a variety of data collection functions as they pass through the pipe. An ILI tool run was completed in 2020 and identified one pipeline anomaly on Algonquin's existing I-1 natural gas pipeline as it traverses Westwood. Anomalies found during the internal tool runs are commonly indications of dents or corrosion along the pipe. The anomaly requires replacement or further investigation and potential repair, and the work will occur within a 100-foot buffer zone of a Bordering Vegetated Wetland resource that is regulated by the Westwood Conservation Commission (see enclosed mapping).

Although the work will occur within an area subject to the Massachusetts Wetlands Protection Act (Act), the work is exempt under the Act's utility maintenance provision because it is required "to maintain, repair or replace, but not substantially change or enlarge an existing and lawfully located structure or facility used in the service of the public and used to provide electric, gas, water, telephone, telegraph and other communication services, provided said work utilizes the best practical measures to avoid or minimize impacts to wetland resource areas outside the footprint of said structure or facility" (310 Code of Massachusetts Regulations 10.02(2)(a)(2)). This site is not located within any mapped Priority Habitats identified by the Massachusetts Natural Heritage and Endangered Species Program under the Massachusetts Endangered Species Act Regulations.

Algonquin is providing this letter to the Westwood Conservation Commission as a courtesy notification regarding the maintenance work involved which is scheduled to occur in June 2021. A brief description of the Project and the mitigation measures that will be implemented during the work is provided in the following sections.



ENVIRONMENTAL CONSULTANTS

Sound Science. Creative Solutions.®

Proposed Work Description

As shown on the enclosed mapping, the anomaly site is located along Algonquin's existing I-1 pipeline easement in Westwood, Massachusetts. The temporary excavation associated with the anomaly investigation will be conducted within Algonquin's existing, maintained and previously disturbed right-of-way (ROW). Construction equipment will travel to the dig site along the existing ROW from Hartford Street (see Figure 2). To investigate the anomaly, a section of pipe will be exposed using an excavator to determine the condition of the pipeline and coating. Remedial measures may include sandblasting and recoating the pipeline, installing a reinforcement sleeve or replacing a section of pipe. Excavation at the anomaly investigation site will measure approximately 40'(L) x 20'(W) x 10'(D). During excavation, topsoil will be segregated from subsoil to help maintain a native seed source during revegetation. Workspace located adjacent to the excavation is necessary for equipment staging, temporary stockpile storage and vehicle parking.

Once the anomaly is repaired and work is completed, crews will backfill the trench and restore the surface to its original conditions in accordance with Algonquin's *Erosion and Sedimentation Control Plan (E&SC Plan)*. The process of excavation, investigation, and remediation will require 3 to 5 days to complete depending on site conditions and weather.

The following is a general construction sequence for the anomaly investigation and repair work:

1. Implement erosion controls as necessary.
2. Excavate at site and implement dewatering best management practices, as necessary.
3. Clean off the pipe.
4. Investigate the anomaly visually and repair, sandblast, and re-coat the pipe as needed.
5. Backfill the excavation.
6. Restore the site to preconstruction conditions, including seeding all previously vegetated, disturbed areas in accordance with Algonquin's E&SC Plan.
7. Remove perimeter erosion control barrier as necessary after the site has been stabilized.

Mitigation Measures

Algonquin will follow its E&SC Plan, a copy of which is available upon request, for all construction activities related to the anomaly investigation. Algonquin routinely conducts maintenance on its facilities within or adjacent to wetland resources and is confident, based on past experience, that the measures specified in its E&SC Plan will effectively minimize any potential adverse impacts to the environment.

Algonquin's E&SC Plan has been prepared for use by the company and its contractors as a guidance manual for minimizing erosion of disturbed soils and transportation of sediments off the ROW and into sensitive resources (e.g., wetlands, streams, and residential areas) during natural gas pipeline construction and maintenance. The procedures in the E&SC Plan, which represent Algonquin's best management practices, are designed to accommodate varying field conditions while maintaining rigid minimum standards for the protection of environmentally sensitive areas. For this effort, personnel will use timber mats to minimize impacts to resource areas that will be temporarily disturbed as a result of the anomaly investigation.

The E&SC Plan is designed to provide specifications for the installation and implementation of soil erosion and sediment control measures while permitting adequate flexibility to use the most appropriate measures based on



site-specific conditions. The intent of the E&SC Plan is to provide general information on the pipeline construction process and to describe specific measures that will be employed during and following construction to minimize impacts to the environment.

The goal of the E&SC Plan is to preserve the integrity of environmentally sensitive areas and to maintain existing water/resource quality by meeting the following objectives:

- Minimize the extent and duration of disturbance.
- Protect sensitive resources from erosion of exposed soil by diverting runoff to stabilized areas.
- Install temporary and permanent erosion control measures.
- Establish an effective inspection and maintenance program.

If you have any questions regarding this information, please do not hesitate to contact me at (207) 387-7026 or via email at laura.delafior@swca.com.

Sincerely,

A handwritten signature in black ink that reads 'Laura H. de la Flor'. The signature is written in a cursive style.

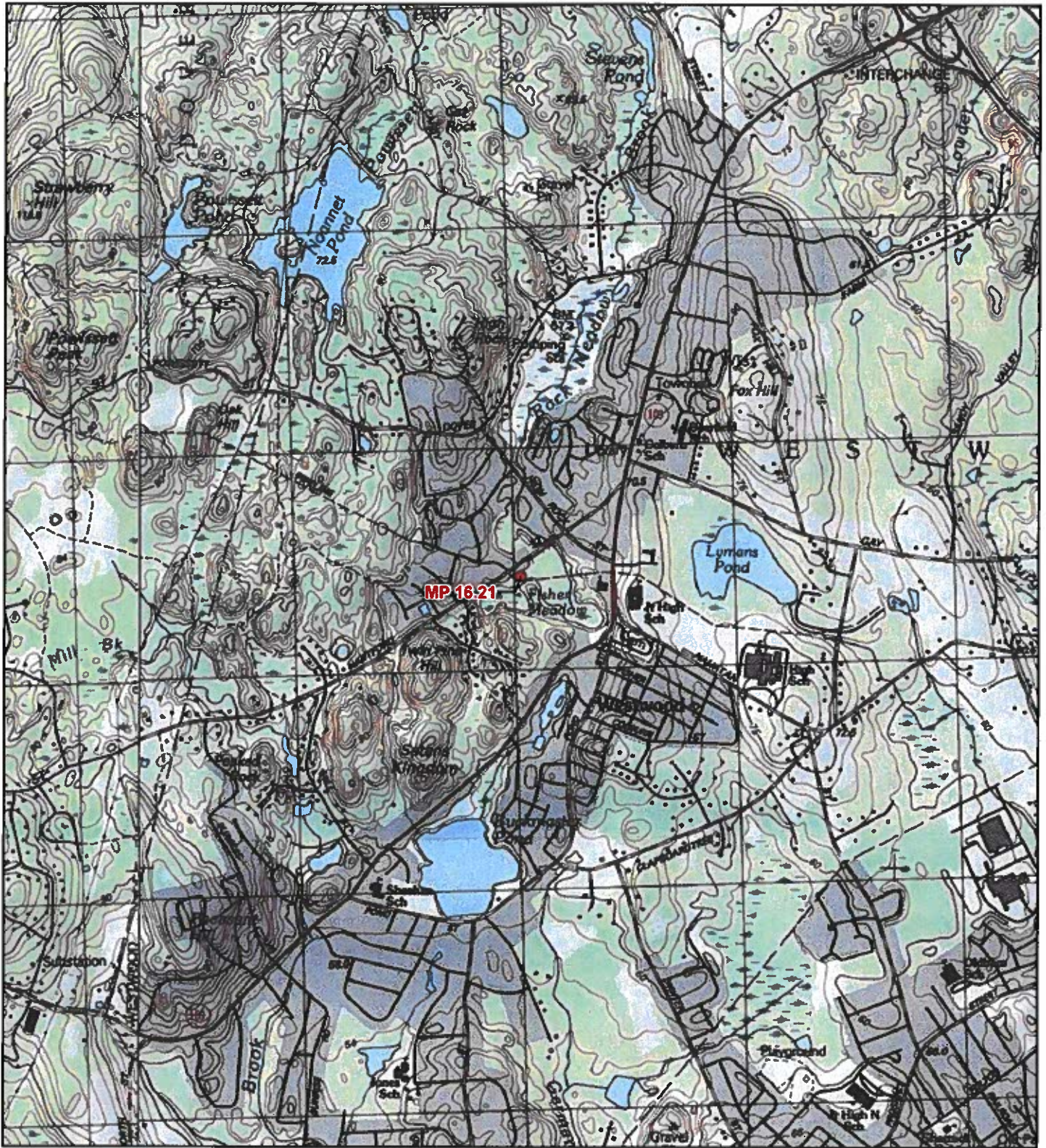
Laura H. de la Flor
Project Manager/Sr. Ecologist

Preemption Statement

Notwithstanding anything to the contrary set forth in this correspondence, nothing stated herein shall be construed to indicate that any state, regional, or local agency referred to has the power to impose any requirement inconsistent with federal law or to refuse to issue or to unreasonably delay the issuance or processing of any state, regional, or local permit, license, certificate, approval, review, or other requirement, nor shall this correspondence be construed to limit Algonquin's legal rights under the Natural Gas Act (15 USC 717 et seq.), Pipeline Safety Act (49 USC 60,101 et seq.), or the United States Constitution, including the Supremacy Clause and Commerce Clause.

ATTACHMENT A

PROJECT MAPPING








**I-1 NATURAL GAS PIPELINE SYSTEM
 ANOMALY INVESTIGATIONS
 AT MP 16.21**

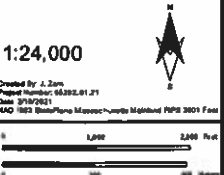
FIGURE 1: PROJECT LOCATION

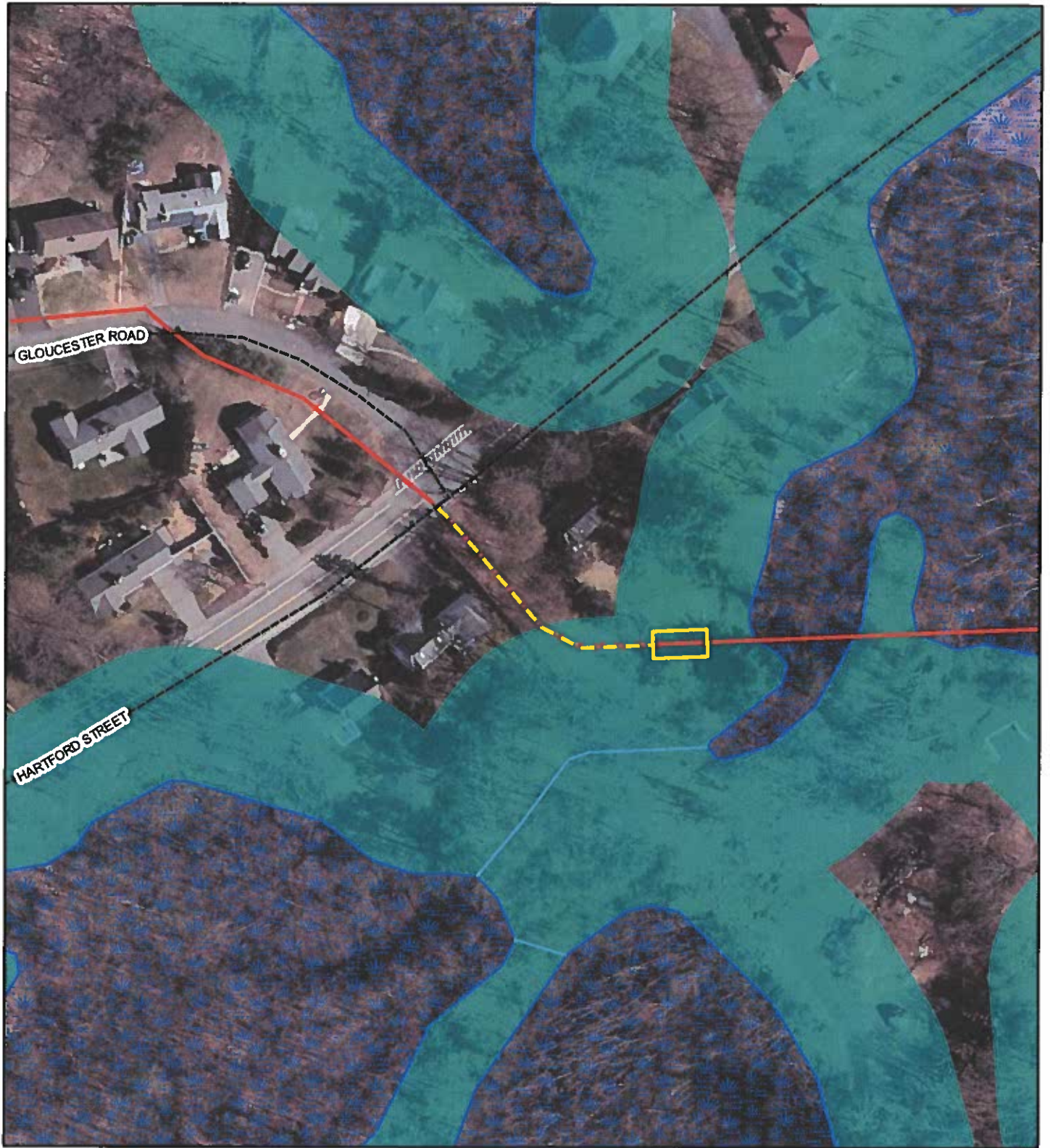
**7.5-MINUTE USGS EAST PROVIDENCE QUADRANGLE
 TOWN OF WESTWOOD
 NORFOLK COUNTY, MASSACHUSETTS
 FEBRUARY 2021**

 Project Location




 ENVIRONMENTAL CONSULTANTS

1:24,000
Created by J.Zam
 Project Number: 042021.01.21
 Date: 02/02/21
 Map: 1000 Standard Massachusetts Modified PPS 2001 Foot




**I-1 NATURAL GAS PIPELINE SYSTEM
ANOMALY INVESTIGATIONS
AT MP 16.21**

FIGURE 2: PROJECT PLANS

**TOWN OF WESTWOOD
NORFOLK COUNTY, MASSACHUSETTS
FEBRUARY 2021**

- ▬ Proposed Workspace Area
- - - Proposed Access
- ▬ Wetland Hydrologic Connection
- MADEP Wetland
- 100' DEP Wetland Buffer
- FEMA Flood Zone
- ▬ Existing Natural Gas Line
- - - Roadway



1:1,200

Created By: J. Zim
Project Number: 062021.21
Date: 01/02/21
MA01000 Statewide Massachusetts Member PPS 2001 Fmt

