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September 5, 2019

Pennsylvania Public Utility Commission  
Attn: Secretary Rosemary Chiavetta  
400 North Street  
Harrisburg PA 17120

Docket No. L-2019-3010267

Dear Secretary Chiavetta:

Thank you for the opportunity to comment on your Advance Notice of Proposed Rulemaking Regarding Hazardous Liquid Public Utility Safety Standards at 52 PA Code Chapter 59. Please express thanks to the Commission for your work balancing the safety of citizens and the interests of commercial enterprises.

#### BACKGROUND

I am a resident of East Goshen Township, Chester County living within 1,000 feet, a high consequence area, of the Mariner East pipeline projects ("pipeline"). I have attended several pipeline informational meetings organized by our Representative in the General Assembly.

#### COMMENTS ON PROPOSED RULEMAKING

1. Utility interactions – I cannot recall any interactions with the operator of the pipeline. At the informational meetings I was informed that my evacuation instructions are "run up-wind; don't use anything that could create a spark." This is a simple, but ineffective evacuation plan. The pipeline operator should be required to provide a laminated card with clear instructions to all households, schools, senior living facilities, and businesses in the high consequence area, conduct evacuation education, and conduct periodic safety drills. Understanding that the pipeline currently carries over 200,000 barrels of natural gas liquids ("NGL") per day, an effective evacuation plan must be in place very soon or the PUC should order the operator to cease NGL transmission until it is accomplished. Safety of the citizens of the Commonwealth is a higher concern than the commercial operation of the pipeline. In short, "run up-wind" is not sufficient instruction. I propose the Commission's engaging

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citizen volunteers, working cooperatively with the operator to help craft a reasonable evacuation plan.

2. Operator qualifications – All employees of the operator and its contractors should be required to successfully complete a state criminal background check.
3. Accident notification – As a resident I believe I would be notified of an accident through the Chester County Emergency Services notification system. I presume that notification would come to my mobile phone. Residents should be certain of the notification protocols. What about neighbors who may not have capable mobile phones?
4. Odorant utilization – I suggest an odorant should be added to the NGL prior to transmission. It would help my neighbors, as residents in a high consequence area identify any leak.
5. Leak detection – I propose effective leak detection monitors to be placed with reasonable separation along the pipeline as it traverses high consequence areas.
6. Protection of above-ground pipe-heads – Above ground pipe-heads should be protected with vehicle barriers and secure fencing. Safety of the citizens of the Commonwealth is very important.
7. Location of shut-off valves – I understand that pipeline shut-off valves are miles apart in the high consequence area where I live. PUC regulations should specify closer distances where population density warrants.

Thank you for considering my comments.

Sincerely,



Richard McIntyre

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