



February 26, 2014

Ms. Kimberly Bose
Federal Energy Regulatory Commission
Office of the Secretary
888 1st Street, NE
Washington, DC 20428

Re: Docket No. PF15-1-000: Comments Regarding PennEast Pipeline Project, Scoping Period

Dear Ms. Bose,

Consideration of the history of paper making in mills adjoining the Musconetcong River in New Jersey needs to be included within the scope of FERC's EIS. [1] When this historic information is coupled with related US EPA publications and other scientific literature, [2] it strongly suggests that contaminants of concern, including dioxins, furans and mercury are likely to be found in areas of fine grain sediments downstream of these mills and potentially in the benthos of both the Musconetcong River and intersecting Delaware River. The confluence of the Musconetcong and Delaware rivers appear to be approximately 500 to 600 meters upstream of the Delaware River crossing proposed by the PennEast Pipeline mapping. [3]

Although the Applicant and/or their installation contractor asserts that their horizontal drilling activities and jacking of the pipeline may be considered "state-of-the-art" and will be below the river bottom, it is highly likely that bottom sediments and contaminants of concern will be re-suspended and accordingly, subject to uptake and bioaccumulation in flora and fauna in the surrounding environment.

Given the US EPA's concern regarding the contaminants noted above, further evidenced by the extremely low "Method Detection Limits" (MDLs), ranging in parts per trillion or lower, plus recently proposed residential soil clean-up levels [4], this matter must be considered of serious concern and carefully evaluated as part of FERC's EIS.

As FERC knows, the Delaware River has been designated under the National Wild and Scenic Rivers Act (NWSRA). This special status specifically protects the river, its watershed and encourages recreational use. Many of these uses lead to direct human contact with the water and sediments and the consumption of fish. Accordingly, any re-suspension of contaminated sediments as described and their potential re-distribution in the river system will undoubtedly lead to an unacceptable increase

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in risk to both human health and the environment. A full and detailed assessment of this matter is clearly needed.

A second concern we believe should be recorded and investigated is older abandoned petroleum pipelines located beneath and/or in the area of the Delaware River. [5] Historical records, regulatory agency documents, both in PA and NJ, and federal agencies suggest that the PennEast Pipeline may, at some locations, intersect the Standard Oil (The Tuscarora Oil Co.) pipeline. We question, will PennEast have joint and several liability for any related clean up? The answer to these threats and questions is an important factor within FERC's EIS.

Other abandoned pipelines which may still contain petroleum products or wastes should also be investigated and a determination made relative to PennEast's responsibility for remediation and potential for off-site liabilities which may apply under CERCLA and the Natural Resources Damage Claims Act.

Third, is a concern which clearly demands FERC's attention, investigation, evaluation and reporting. These problems and issues relate to corrosion occurring on the internal surfaces of the "natural gas" pipelines. The "natural gas" proposed to be conveyed by the PennEast pipeline is likely to contain trace levels of chemical constituents used in the drilling/"fracking" process and even enhance the corrosive nature of the product. This may cause problems with the internal surfaces of the pipes, valves and related equipment. Issues and problems associated with the variability and changes in gas composition and pipeline materials is reported in great detail by PSE&G's self-published book. [6] They (PSE&G) describe how "infinitesimal drops of zinc or silica or copper" "could very quickly lead to the catastrophic failure of steel pipe (tubes)." In addition to their own descriptions, engineering journals published numerous articles during the 1920s-1950s relating to this problem. PSE&G's own first-hand experience highlights the potential dangers to human health and the environment from trace levels of "un-natural" components in natural gas.

Sincerely,

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is fluid and cursive, with a long horizontal line extending to the right.

Maya K. van Rossum
the Delaware Riverkeeper

REFERENCES

[1] Fifty Years of Paper Making – A Brief History of the Origin, Development and Present Status of the Warren Mfg. Company 1873-1923; Published by the Warren Mfg. Co., Boston, 1923

Story of Papermaking, Edwin Sutermeister, 1954; Published by S.D. Warren Co.

Chemistry of Pulp and Paper Making, Edwin Sutermeister ISBN 10: 1230859330/ISBN 13: 9781230859330

Digital Sanborn Maps, 1867-1970; Sanborn fire insurance maps contain not only detailed information on urban structures and property boundaries, but detailed process drawings/piping layouts process chemicals employed for many mfg. facilities/mills

[2] Agency for Toxic Substances and Disease Registry (ATSDR)

--Chlorinated Dibenzo-p-dioxons (CDDs) (extensive information and references to other related publications). As noted in Summary, "They (mainly 2, 3, 7, 8 – TCDD) may be formed during the bleaching process at pulp and paper mills."

--Toxicological profiles: National Technical Information Service

--ATSDR, Public Health Statement for Mercury

--Numerous US EPA Publications including Dec. 1997. Mercury Study, Report to Congress and subsequent amendments/revisions

--Scientific/Engineering publications cited in the "Engineering Index," 1880-present

[3] PennEast Pipeline Company, LLC

Pipeline Project, Proposed and Revised Location Map; online

[4] News release, August, 2014; US EPA's proposed plan to remove and replace soil in residential yards which contained more than 250 ppt of dioxins; Cleanup of floodplains down river of Dow Chemical's Midland, Mich. Facility

[5] Records on file with the Hunterdon County Historical Society

[6] "A History of PSE&G, the Energy People," by James C. G. Conniff and Richard Conniff; published by Public Service Electric and Gas Company, 1978 ISBN: 0-9602014-1-6