



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Office of Permitting & Project Navigation
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CATHERINE R. McCABE
Commissioner

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulation Commission
888 First Street, NE
Washington, DC 20426

October 7, 2020

Mr. Scott Horner
Williams Transco
2800 Post Oak Boulevard
PO Box 1396
Houston, Texas 77056

**RE: Transcontinental (Transco) Gas Pipeline Company
Regional Access Expansion Project
Burlington, Camden, Gloucester, Hunterdon, Mercer, Somerset and Warren Counties
FERC Docket #PF20-3-000
Comments on Resource Reports Documents**

Dear Ms. Bose and Mr. Horner:

The New Jersey Department of Environmental Protection's (NJDEP) Office of Permitting and Project Navigation (OPPN) distributed, for review and comment, the Resource Reports Documents on the proposed Transco Regional Access Expansion Project.

NJDEP offer the following comments on the Resource Report Documents:

Land Resource Protection Program

Compressor Station 201 is a new turbine gas-fired or electronic compressor station proposed in West Deptford, Gloucester County. The station is close to an unstudied portion of Little Mantua Creek and the project may be far enough away from the tributary to be outside of a flood hazard area. It is recommended that Transco obtain a Flood Hazard Area Verification for Compressor Station 206.

Adding a new gas-fired turbine or electric driven compressor at existing Compressor Station 505 in Branchburg, Somerset County and modifying existing regulators. The new CS will be located within the footprint of an existing facility. This site is adjacent to an unnamed tributary to Pleasant Run which is not a State studied stream. A Flood Hazard Area Permit would be required if the proposed activities are within a flood hazard area. It is recommended that Transco obtain a Flood Hazard Verification for this part of the project.

Modification to existing valves and piping at the Princeton Jct. Station 210 in Princeton Twp. all within the existing facility. This facility appears to be located outside of any flood hazard area and therefore a Flood Hazard Area would not be required.

Modification to existing delivery meter stations in Camden and Barrington, Camden County and Mt. Laurel, Burlington County. The Camden Meter and Regulating Station is located within a flood hazard area. The activity at the Camden meter station may qualify for a Permit By Rule, however insufficient project details have been provided to make that determination. The Mt. Laurel meter station is not located within any flood hazard area and therefore a Flood Hazard Area permit would not be required.

It is recommended that Transco obtain a Freshwater Wetlands Letter of Interpretation for the CS201 site in West Deptford, Gloucester County, the CS 505 site in Branchburg, Somerset County, and the Station 210 site in Princeton Township, Mercer County.

If you have any questions, please contact Christopher Jones, Manager, Bureau of Urban Growth & Redevelopment at (609) 984-6216 or Christopher.Jones@dep.nj.gov.

Historic Preservation Office (HPO)

As indicated in the documentation submitted, the proposed project will require consultation with our office, pursuant to Section 106 of the National Historic Preservation Act, for the identification, evaluation and treatment of historic properties within the project's area of potential effects. As a result, the HPO looks forward to further consultation with the Federal Energy Regulatory Commission, pursuant to their obligations under Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR §800. The HPO will notify the Office of Permitting and Project Navigation of any developments as consultation moves forward.

In addition, if future project activities require any Freshwater Wetlands permits, Waterfront Development permits, and/or Upland Development permits issued by the State of New Jersey's Division of Land Use Regulation, Highland Preservation Area Approval Permits, as well as environmental assessments under Executive Order 215, further consultation with the HPO will be necessary and archaeological and architectural survey may be appropriate.

If you have any questions, please contact Jesse-West Rosenthal of Historic Preservation Office at (609) 984-6019 or jesse.west-rosenthal@dep.nj.gov.

Bureau of Surface Water Permitting

Based on a review, a NJPDES Discharge to Surface Water permit will be needed for any surface water discharge during construction (i.e., dewatering; pipe integrity testing, etc.).

If the discharge is shown to not contain pollutants at levels exceeding applicable standards, Transco may be eligible for a t B7 - Short Term De Minimis NJPDES discharge to surface water permit (see <http://www.nj.gov/dep/dwq/gp-b7.htm>). This is determined by running a pollutant scan as described in the application checklist where the data can be collected up to a year in advance of the discharge. However, if the discharge does contain pollutants at levels exceeding applicable standards,

(see <http://www.state.nj.us/dep/dwq/pdf/b7-deminimis-final-permit-5-20-15.pdf>), Transco must obtain a BGR – General Remediation Cleanup permit (see http://www.nj.gov/dep/dwq/gp_bgr.htm).

In addition, based on the review, a NJPDES Discharge to Surface Water permit will be needed for any surface water discharge from hydrostatic testing. The appropriate NJPDES discharge to surface water permit will be the BG - Hydrostatic Test Water Discharges (see http://www.nj.gov/dep/dwq/gp_hydrostatic.htm). To be authorized under the BG permit, an application must be submitted to the Department at least 14 days prior to discharge.

If you have any questions, please contact Dwayne Kobesky, of the Division of Water Quality, Bureau of Surface Water Permitting at (609) 292-4860 or Dwayne.Kobesky@dep.nj.gov

Bureau of Non-Point Pollution Control

If more than one acre will be disturbed, a general permit for Construction Activities, (5G3) may be required. The permit application process is available online <http://www.state.nj.us/dep/DWQ/5G3.htm>.

If you have any questions, please contact Eleanor Krukowski at (609) 633-9286 or eleanor.krukowski@dep.nj.gov.

Air Permitting

The permitting requirements are in N.J.A.C. 7:27-8 for non-major facilities and N.J.A.C. 7:27-22 for major facilities. N.J.A.C. 7:27-5 prohibits impact offsite for such things as odor and dust.

For both the new Compressor Station 201 (Gloucester County) and the existing Compressor Station 505 (Somerset County), the Department recommends that Transco consider electric motor-driven compressors because both sites are near residential areas. If Transco were to propose natural gas turbines, a health risk assessment would be required, which would likely show increased potential effect due to the nearby residences.

If you have any questions, please contact Danny Wong of the Bureau of Air Permitting at danny.wong@dep.nj.gov.

Air Evaluation and Planning

1.3.3.1 Trenchless Construction Methods

Resource Report 1 states, “Transco evaluated several methods of trenchless construction: conventional horizontal bore, HDD, and Direct Pipe. These techniques may be used in an attempt to reduce impacts associated with construction in comparison with using conventional (trenching) construction techniques.”

Section 93.157 (d) (Reevaluation of Conformity) of the Federal General Conformity regulation states, “If the Federal Agency originally determined through the applicability analysis that a conformity determination was not necessary because the emissions for the action were below the limits in 93.153 (b) and changes to the action would result in the total emissions from the action being above the limits in 93.153 (b), then the Federal agency must make a conformity determination.” If there are changes in the air emissions for this project due to the use of different construction methods (horizontal bore, HDD, Direct Pipe), please revise the General Conformity Applicability Analysis and the Construction Emissions

Calculations (Appendix 9A) to include the air emissions, and if necessary prepare a Conformity Determination in accordance with 93.157 (d) of the Federal General Conformity regulation (40 CFR Part 93).

This comment applies to all further comments below.

1.3.4.3 Building Design and Construction

Resource Report 1 states, “During a typical building construction sequence, the pre-fabricated structural members, steel plate, steel roof decking, gutters and all associated hardware are off loaded from the transport trailer and then are installed and erected in place on the constructed foundation and/or pad.”

Please clarify if the air emissions associated with transporting the materials needed for building construction within the nonattainment area have been included in the General Conformity Applicability Analysis and Construction Emissions Calculations (Appendix 9A). If the air emissions have not been included, please revise the General Conformity Applicability Analysis to include them and prepare a Conformity Determination if necessary in accordance with 93.157 (d) of the Federal General Conformity regulation (40 CFR Part 93).

Table 1.6-1 – Anticipated Permits, Licenses, Approvals, and Consultations to be Applied for/Requested for the Project

Table 1.6-1 in Resource Report 1 states there is an anticipated “CWA Section 404 Permit/Section 10 River and Harbor Act,” administered by “USACE Baltimore District and Philadelphia District.”

Section 93.154 (Federal agency conformity responsibility) of the Federal General Conformity Regulation states, “Where multiple Federal agencies have jurisdiction for various aspects of a project, a Federal agency may choose to adopt the analysis of another Federal agency or develop its own analysis in order to make a conformity determination.” Please clarify if the air emissions associated with the USACE permit are included in the General Conformity Applicability Analysis and the Construction Emissions Calculations (Appendix 9A). As indicated in the USEPA’s General Conformity Guidance: Questions and Answers (July 13, 1994), “...all reasonably foreseeable emissions must be included for the project as a whole in determining applicability. A project cannot be broken down into segments so that each segment is below the de minimis level.”

1.3.3.10 Rock Removal

Resource Report 1 states, “As a last resort the rock will be hauled off the ROWs and disposed of at an approved landfill or recycling facility.”

If there are changes to the air emissions associated with this project due to the rock removal, please revise the General Conformity Applicability Analysis and the Constructions Emissions Calculations (Appendix 9A) to include these emissions, and if necessary prepare a Conformity Determination in accordance with 93.157 (d) of the Federal General Conformity regulation (40 CFR Part 93).

1.3.4.2 Foundations

Resource Report 1 states, “Building foundations will be constructed of reinforced concrete. Buildings and associated equipment will be placed on the foundations.”

Please clarify if the air emissions associated with the trucks delivering the reinforced concrete within the nonattainment area are included in the Annual Emissions Estimates (Appendix 9A), and if the emissions associated with these trucks are accounted for under “Company Trucks”, “Delivery Trucks” or “Contractor Trucks”. If the air emissions associated with the trucks delivering the reinforced concrete are not included in the Annual Emissions Estimates (Appendix 9A), please revise the General Conformity Applicability Analysis and the Construction Emissions Calculations (Appendix 9A) to include them. And if necessary prepare a Conformity Determination in accordance with 93.157 (d) of the Federal General regulation. (40 CFR Part 93.)

If you have any questions, please contact Connor Milligan of the Bureau of Air Planning and Evaluation at connor.milligan@dep.nj.gov.

Air Planning - Bureau of Mobile Sources

1. Heavy duty equipment used for construction must adhere to the No Idling regulations, including not idling for more than 15 minutes above 25 deg. F.
2. Any and all light duty vehicles on the premises during construction cannot idle for more than 3 minutes.
3. Heavy duty equipment used for construction and demolition must minimize idling whenever possible
4. All medium and heavy-duty equipment used for construction should meet the US EPA Tier 4 non-road emission standards and should use Ultra Low Sulfur Diesel (ULSD) fuel when applicable.
5. Any operation of heavy-duty equipment near residential neighborhoods of Higgins Farm Access Road must minimize noise pollution from construction and idling.

For the No Idling Regulations specifics, please read below:

1. All on-road vehicles and non-road construction equipment operating at, or visiting, the construction site shall comply with the three-minute idling limit, pursuant to N.J.A.C. 7:27-14 and N.J.A.C. 7:27-15. Consider purchasing “No Idling” signs to post at the site to remind contractors to comply with the idling limits. Signs are available for purchase from the Bureau of Mobile Sources at 609/292-7953 or <http://www.stophesoot.org/sts-no-idle-sign.htm>.
2. All non-road diesel construction equipment greater than 100 horsepower used on the project for more than ten days should have engines that meet the USEPA Tier 4 non-road emission standards, or the best available emission control technology that is technologically feasible for that application and is verified by the USEPA or the CARB as a diesel emission control strategy for reducing particulate matter and/or NOx emissions.
3. All on-road diesel vehicles used to haul materials or traveling to and from the construction site should use designated truck routes that are designed to minimize impacts on residential areas and sensitive receptors such as hospitals, schools, daycare facilities, senior citizen housing, and convalescent facilities.

If you have any questions, please contact Kris Dahl of the Bureau of Mobile Sources Survey at Kris.Dahl@dep.nj.gov.

Thank you for giving the New Jersey Department of Environmental Protection the opportunity to comment on the information provided in the Resource Report Documents for the Transco Regional Expansion Project. If you have any additional questions, please do not hesitate to call me at (609) 292-3600.

Sincerely,

A handwritten signature in black ink that reads "Megan Brunatti". The signature is written in a cursive style with a horizontal line underneath it.

Megan Brunatti, Chief
Office of Permitting & Project Navigation