



November 10, 2011

**BY E-MAIL**

Dan Osterfeld  
Ohio Environmental Protection Agency  
Division of Surface water, 401/WP Unit  
Lazarus Government Center  
50 West Town St.  
Columbus, OH 43216-1049

**BY E-MAIL**

Susan Fields  
US Army Corps of Engineers  
502 8<sup>th</sup> St.  
Huntington, WV 25701

**RE: Dominion East Ohio (DEO)  
Emergency Repair on Transmission Pipeline 15 (TPL-15)**

Dear Susan and Dan;

Dominion East Ohio (DEO) recently completed an integrity assessment of an existing transmission pipeline (TPL-15) in Columbiana County, OH, as required by the US Department of Transportation (DOT) federal regulation 49 CFR Part 192 Subpart O. During this integrity assessment, damage affecting the integrity of the pipeline was found on the existing 30-inch pipeline. To decrease stress on the pipe, pressure in the pipeline was reduced by 20% as per 49 CFR Part 192.933(a)(1). This pressure reduction must remain in effect until the anomalous condition is permanently repaired in accordance with 49 CFR Parts 192.711, 192.713 and 192.933. This anomaly is located within the confines of a Category III wetland as scored using the Ohio ORAM scoring methodology.

Currently, this line is the only source of natural gas for Kent State University, which uses this natural gas to generate power and heat for the entire University. As the temperatures decrease, additional natural gas will be required. The reduced pressure in the pipeline will not be sufficient to adequately supply the university and the other consumers along this pipeline. It is

anticipated that the pipeline will need to be at full pressure by mid December to insure adequate gas flow.

The TPL-15 anomalous condition is located southeast from the intersection of Rochester Road and Mountz Road of in West Township, Columbiana County, Ohio. The latitude and longitude coordinates for the pipeline repair are:

Location	Latitude	Longitude
TPL-15 Repair Location	40.802886 °N	- 80.975836°W

Construction will begin on December 1<sup>st</sup> and DEO will comply with BMP's for work in wetlands and waterbodies, including the provisions of NWP#12 and General and Ohio Conditions. Additionally, timber mats will be used for access and to reduce impacts to the wetland. All impacts to aquatic resources will be temporary and impacted areas will be restored to preconstruction contours and no tree clearing will occur. Total temporary wetland impacts total approximately 0.055 acres of PEM wetland community type. Coordination has been initiated with the U.S. Fish and Wildlife Service and the Ohio Department of Natural Resources. Please find attached pictures of the wetland along with maps showing the location of the repair.

Due to restricted timelines, DEO will not have the ability to apply for and receive a Nationwide permit or an Ohio Section 401 water quality certification prior to commencing the repair activity. DEO would like to submit after the fact permits for this project. Please respond to this letter with concurrence of this action plan.

If you have any questions, please call Judith Box at (330) 664-2579.

Sincerely,



Sam Mathew, P.E.  
Manager, Gas Environmental

Enclosures

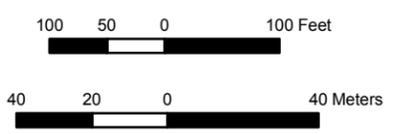
Cc Judith Box

**Attachment A**  
**(Maps)**



Figure 1. Site Map of Wetlands and Other Water Resources. TPL-15 - Repair Site.

- Sample Location
- Stream (Perennial)
- Proposed Access
- Pipeline / Study Area
- Wetland (PEM)
- Wetland (PFO)
- Wetland (PSS)
- Construction Limits



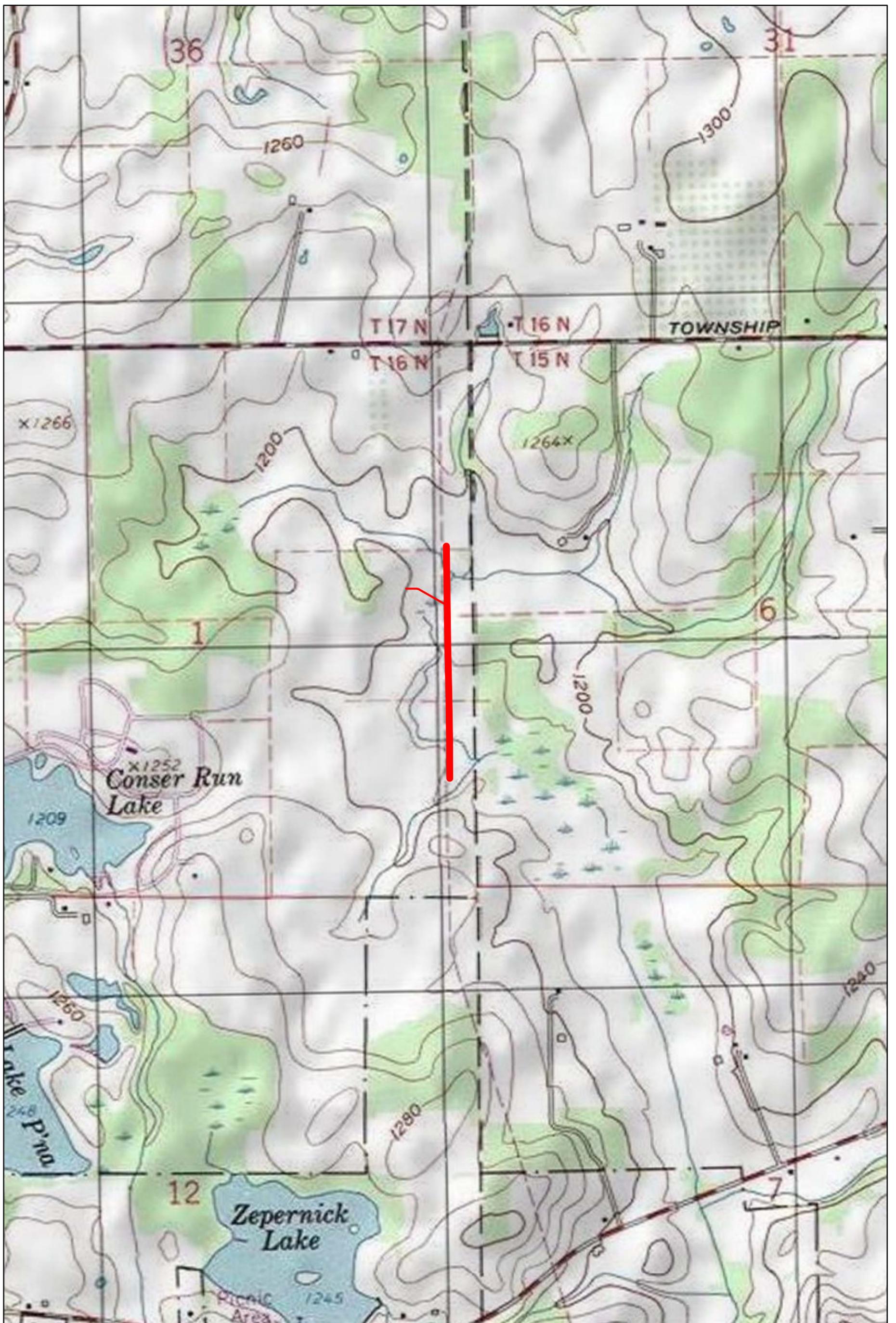


Figure 2. USGS 7.5-minute Topographic Map of Hanoverton Quadrangle. TPL-15 - Repair Site.

 Study Area



**Attachment B  
(Photographs)**

*TPL-15 Pipeline Repair Project  
Photographed November 8, 2011*



Photo 1. Location of TPL-15 Repair



Photo 2. W-1 (PEM) facing north from TPL-15 Repair Location

*TPL-15 Pipeline Repair Project  
Photographed November 8, 2011*



Photo 3. W-1 (PEM) facing south within maintained ROW



Photo 4. W-1 (PSS) facing northwest from TPL-15 Repair Location

*TPL-15 Pipeline Repair Project  
Photographed November 8, 2011*



Photo 5. W-1 (PFO) facing south from proposed access route



Photo 6. S-1 facing west upstream

*TPL-15 Pipeline Repair Project  
Photographed November 8, 2011*



Photo 7. S-1 facing east downstream



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

November 22, 2011

By E-Mail

Sam Mathew, P.E.  
Manager, Gas Environmental  
Dominion Resources Services, Inc.  
320 Springside Dr., Ste. 320  
Akron, Ohio 44333

RE: Dominion East Ohio (DEO)  
Emergency Repair on Transmission Pipeline 15 (TPL-15)

Dear Mr. Mathew:

Ohio EPA has reviewed your November 10, 2011 letter characterizing the emergency situation on Dominion East Ohio TPL-15 in Columbiana County, Ohio. Ohio EPA concurs with your assessment that an emergency situation exists that must be dealt with as soon as possible. As a rapid response is necessary, and that there is insufficient time to address this situation through the normal permitting process, Ohio EPA understands and agrees that DEO should expedite the repair the damaged pipeline utilizing all appropriate BMP's, including timber mats, and then apply to Ohio EPA for an after-the-fact Section 401 water quality certification.

An after-the-fact water quality certification will be processed following all the standard antidegradation review provisions, including a public hearing, if required. Ohio EPA has committed to conduct a site visit on November 28, 2011 to assess the impacted wetland, which DEO has scored as a Category 3 wetland using ORAM 5.0.

If you have any questions, please contact me either by phone at (614) 644-2152 or by email at [dan.osterfeld@epa.state.oh.us](mailto:dan.osterfeld@epa.state.oh.us).

Regards,

Dan Osterfeld  
401 Coordinator  
Ohio EPA, Division of Surface Water

Cc: Susan Fields, ACOE (by e-mail)  
Judi Box, DEO (by e-mail)