



May 5, 2015

Ohio Environmental Protection Agency  
Division of Surface Water  
ATTN: 401/IWP/Mitigation Section Manager  
Columbus, Ohio 43216-1049

**Subject: Sunoco Pipeline, L.P. (SNPL), Ohio Pipeline Project  
Harrison and Jefferson Counties, Ohio  
Ohio EPA 401 WQC Application**

Dear Sir or Madam:

## **INTRODUCTION**

Sunoco Pipeline, L.P. (SPLP) proposes to construct and operate the Ohio Pipeline Project (Project) to provide natural gas liquid (NGL) transportation of up to 350,000 barrels per day, per pipeline. The Project involves the phased installation of approximately 70 miles of two parallel pipelines within a 54-mile, 50-foot-wide right-of-way (ROW) from Scio, Harrison County, Ohio to Houston, Washington County, Pennsylvania with the purpose of interconnecting with existing SPLP Mariner West and Mariner East pipelines. A 54-mile, 20-inch diameter pipeline would be installed within the ROW from Scio, Ohio to Houston, Pennsylvania. Of the 54 miles, 29 miles will be in Ohio.

## **PURPOSE**

The purpose of this Project will be to provide transportation service for up to 350,000 barrels per day of NGL's per pipeline from the Utica and Marcellus Shale formations for both domestic and international markets. This Project will transport propane, butane and potentially ethane. SPLP's upstream customers currently extract natural gas in the form of methane from the aforementioned geologic formations for distribution to the community. The natural gas will provide fuel for power generation, heating and cooking. NGLs are separated from the natural gas stream before it is shipped on the natural gas piping network. Upstream shippers are currently limited by the shortage of NGL transport systems. In addition, the Project will provide along its route in Ohio, West Virginia, and Pennsylvania various exit points for supply of desperately needed propane supplies, at affordable prices, to local distributors for use as heating and/or cooking fuel by consumers, especially during peak demand periods when supplies would otherwise become short. In addition, when completed, the Ohio Pipeline Project will promote sustained economic development and jobs-creation.

## **PROPOSED RIGHT-OF-WAY**

The proposed Project would result in temporary access during construction of the proposed facilities. In general, during construction of the new pipeline, the width of the construction ROW would typically be 75 feet. The 75-feet would consist of a 50-foot-wide post-construction, permanently maintained ROW and 25-feet of temporary workspace to facilitate installation of the pipelines. The 25-feet would be restored and allowed to revert back to its pre-construction condition unless it is co-located with an existing permanently maintained ROW. Additional temporary work space (ATWS) would be needed at some areas to facilitate construction and would depend on site-specific requirements. All Workspaces would be clearly defined within project mapping and within agency and municipality applications. In the post-construction phase, ATWS's will be allowed to revert, or be restored to, pre-construction conditions.

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## **IMPACT SUMMARY**

To minimize adverse effects on the aquatic environment, SNPL has committed to reducing the construction ROW to a 50 foot width when crossing wetlands and streams as outlined within this application (i.e., Minimum Degradation Alternative). The project, implemented under the Minimum Degradation Alternative, would cross fifty-one (51) wetlands and ninety-one (91) streams and temporarily affect 2.61 acres of wetland habitat and 446 linear feet of stream (measured bank to bank). All temporary impacts would be to palustrine emergent wetlands and palustrine unconsolidated bottom wetlands. No temporary or permanent impacts to palustrine forested wetlands would occur as a result of avoidance efforts. Approximately 0.36 acres of scrub-shrub wetlands will be temporarily and permanently impacted due to this project. An In-Lieu Fee program will be used to meet the compensatory mitigation requirements in OAC 3745-1-54.

## **MITIGATION SUMMARY**

Wetlands and streams impacted on-site will be mitigated. In accordance with required Ohio EPA mitigation ratios, additional mitigation will be done through In-Lieu Fee (ILF) through The Nature Conservancy. Credits have been reserved with The Nature Conservancy for the anticipated required mitigation.

## **APPLICATION SUBMITTAL SUMMARY**

Because the project will temporarily impact greater than 0.5 acres of wetlands, an Individual 401 WQC is required. Isolated wetlands were not encountered on this project; therefore, there is not a need for an Isolated Wetlands Permit.

The major components of this WQC application package are attached and include:

- Item 1 – Application Form
- Item 2 – Stream and Wetland Impact Tables
- Item 3 – Waterbody and Wetland Delineation Report
- Item 4 – Correspondence
- Item 5 – Antidegradation Analysis
- Item 6 – Project Mapping
- Item 7 – Mitigation Plan

The submittal includes the following volumes:

- Volume I – Items 1 through 5
- Volume II-A and Volume II-B – Item 6
- Volume III – Item 7

SNPL is seeking authorization to perform the work under a Nationwide Permit (NWP) and will submit a Preconstruction Notification (PCN) on May 15, 2015 pursuant to the U.S. Army Corps of Engineers (USACE) Nationwide Permit #12 – Utility Line Activities. SNPL will forward the authorization upon receipt.

SNPL is also requesting a USACE preliminary jurisdictional determination (JD) for the project to expedite the processing of the application as well as to ensure protection of potential waters of the U.S. SNPL understands that under a USACE preliminary JD the permit decision making process used by the USACE will treat all waters and wetlands that would be affected in any way by the permitted activity on the site as if they are jurisdictional waters of the U.S. A copy of the USACE's preliminary JD, will be forwarded to the Ohio EPA once it is received.

**CLOSING**

One hard copy and one electronic copy of the Ohio EPA 401 Water Quality Certification (WQC) pursuant to Section 401 of the Clean Water Act for the installation of the OPP section in Ohio is attached for agency review.

We appreciate your assistance with this application. If you have questions or need additional information, please feel free to contact Larry Drane of Tetra Tech, Inc. at (330) 286-3683.

Sincerely,



Lawrence A. Drane III, P.G.  
Sr. Project Manager

Enclosures

cc. Matt Gordon, Sunoco Pipeline, L.P. (cover letter only)  
Brad Schaeffer, Tetra Tech, Inc. (cover letter only)  
Sandy Lare, Tetra Tech Inc. (cover letter only)  
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