



TOWN OF MERRIMACK, NH

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September 28, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Docket No. PF14-22-000- Additional Scoping Comments from the Town of Merrimack specific to a Meter Station sited in the Town

Dear Secretary Bose,

The Town of Merrimack (Town) has been identified as the likely site for a new meter station on the Northeast Energy Direct (NED) pipeline route. The potential for locating this facility in our town raises many questions and we respectfully request that the Federal Energy Regulatory Commission (Commission) ensure that all potential impacts of the proposed meter station be thoroughly evaluated and addressed in the Commission’s Environmental Impact Statement (EIS).

Tennessee Gas Pipeline’s (TGP) June, 2015 Draft Resource Report 9, Air and Noise Quality, leaves many questions unanswered, most importantly the type of equipment to be installed at the West Nashua meter station (Section 9.2.3.24). When this information becomes available, the Town may have additional questions. Based on the information provided to date, we request that the Commission require TGP to address the following.

NOISE IMPACTS

1. Identify all equipment, operations, and procedures, both ongoing and occasional, that may produce noise audible outside of the meter station building and the maximum noise level that may be emitted individually or cumulatively based on normal and any foreseeable abnormal or emergency operations.
2. Identify all noise-sensitive areas within a one-mile radius of the proposed meter station where a quiet setting is a reasonably expected attribute, including, but not limited to residential, educational, health, and religious structures and sites, and parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites.

Assessing P: 603-424-5136 F: 603-424-0461	Community Development P: 603-424-3531 F: 603-424-1408	Finance P: 603-424-7075 F: 603-423-8539	Human Resources P: 603-424-2331 F: 603-424-0461	Media Services P: 603-423-8561 F: 603-424-0461
Public Assistance P: 603-423-8535 F: 603-423-8539	Public Works Administration P: 603-424-5137 F: 603-424-3890	Town Council P: 603-424-2331 F: 603-424-0461	Town Manager P: 603-424-2331 F: 603-424-0461	

3. Conduct pre-construction noise surveys to accurately identify baseline noise. These surveys should be conducted over a period of weeks during the winter months, when seasonal noise is not introduced as a factor influencing background noise levels. All areas identified under item #2 above must be included in the study.
4. Include in the noise impact study data specific to Anheuser-Busch (INBEV), specifically to their horse and other livestock housed near the proposed meter station site.
5. Specifically address noise impact study data with regard to wildlife in and adjacent to the Merrimack River corridor.
6. Using the data compiled, provide a detailed noise assessment outlining how noise disturbances will be addressed.
7. Conduct after-construction noise surveys within one month of the in-service date to assure compliance with all noise regulations and continue surveys on an ongoing basis, including during winter months.
8. Install additional engineering controls and/or noise mitigation as needed after construction to insure that residents and businesses are not negatively impacted.
9. Include in the cost analysis the reduction in property value adjacent to the meter station due to noise and other factors.

The town is also concerned about air and water quality issues related to leaks. In a written response to questions from the Town, TGP stated that:

“All compressor and meter station [sic] along the pipeline routes are monitored from the 24-hour control center[...] If a leak is detected that does not represent a safety concern and is classified as a non-hazardous leak an appropriate repair plan would be developed. An example of a non-hazardous leak that would not require a system shut down could be a valve packing that can be tightened to stop the leak.”

TGP’s statement that leaks may happen and may be allowed to continue while a repair plan is developed is unacceptable given that the proposed site is located in close proximity to the Merrimack River as well as numerous residences, schools, medical facilities, and businesses. The Town respectfully requests that the Commission require as part of the EIS process that TGP set forth specific proposals for evaluation of the air, water, and soil surrounding the proposed meter station before, during and after construction and during the operational life of the station.

Specifically, the Town requests that TGP:

1. Quantify in detail all emissions that could be produced by the proposed facility including all emissions from reasonably anticipated future leaks of the system, and intentional and unintentional venting of natural gas.
2. Quantify the effects to human health and welfare in terms of number of people exposed to the emissions, and the number of people who would develop adverse health effects from the exposure. Identify all potential adverse health effects.
3. Quantify the effects to human health and welfare to sensitive populations, including, but not limited to: children; people with lung disease, such as asthma, emphysema, or chronic bronchitis; and older adults.

4. Quantify the indirect costs associated with the effects to human health and welfare, including health care costs, insurance cost, loss of wages, unemployment insurance, and reduction in productivity.
5. Include a separate evaluation of all of the above with regard to domestic animals and livestock, including but not limited to the Anheuser-Busch (INBEV) Clydesdales, pets, and wildlife.
6. Detail compliance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and the New Source Performance Standards.
7. Detail and evaluate all emission control alternatives for the proposed facility.
8. Include specific health-based and epidemiological criteria to determine the significance to air quality.
9. Describe reductions-by-design, emission controls, emission offsets, and other mitigation that would be implemented to reduce air quality impacts.

The Town also believes that locating a meter station in close proximity to the Merrimack River and other conservation lands within the Town presents unique concerns which require additional studies, including but not limited to:

1. Impact of all noise and emissions on aquatic life, including impacts during spawning and all lifecycle stages.
2. Identification of all federally listed essential fish habitat (EFH) that potentially occurs in the vicinity of the project. Provide information on all EFH, as identified by the pertinent Federal fishery management plans, which may be adversely affected by the project.
3. Provision for site-specific mitigation measures to minimize impacts on fisheries, wildlife, and vegetation including data on impacts on amphibians.
4. Production of a stormwater management plan that shows how the Merrimack River and all surrounding areas will be potentially impacted during construction and operation of the facility, and methods that will be used to minimize that impact.
5. Include copies of correspondence containing recommendations from appropriate Federal and state fish and wildlife agencies to avoid or limit impact on wildlife, fisheries, and vegetation, and the applicant's response to the recommendations.

The Town also has several concerns for the design, operation, and ongoing maintenance of the facility, including but not limited to:

1. Detailed analysis of the construction and maintenance of the meter station building, including details on consideration for visual impact on surrounding properties.
2. Detailed analysis of lighting and the impact of light on the surrounding area.
3. Detailed analysis of emergency planning and response plans.
4. Detailed analysis of safety measures, such as installation of a fast-acting emergency shutdown valve upstream to cut the station off in the case of a leak, and a check valve downstream to prevent backflow of gas during a leak.
5. Provision of a wetlands survey for the site and all surrounding areas.
6. Provision of a comprehensive soils survey.
7. Detailed analysis of impacts to cultural and archaeological resources.
8. Impacts to endangered and/or threatened species.

9. Detailed analysis of the construction and maintenance of the fence surrounding the facility, including visual impact on surrounding properties.
10. Detailed analysis of the access road, including how it will be maintained (e.g., plowing in winter, unauthorized access) and gated. Will local officials have the keys to the gate?
 - o Specific information on the use of ice melt chemicals and ice and snow removal best management practices on access roads and parking areas.
11. Detailed analysis of the impact of temperature on the pipeline and the meter station specific to New Hampshire, such as extremes of temperature, expected maximum depth of frost, impact of frost heaves on all equipment, the access road, the pipeline, the meter station, case studies of pipelines and meter stations in a similar topography and climate.
12. Specific information on the use of non-mechanical means of vegetation control (e.g., chemical defoliant and herbicides), around the equipment and meter station including responsibility for monitoring for chemical use and corrective action that will be taken if agreements with property owners are not adhered to.
13. Specific information about all substances to be stored at the facility, such as mercaptan.

We appreciate the Commission's assistance with obtaining from TGP information regarding these anticipated impacts to the Town.

Thank you.

Sincerely,



Eileen Cabanel
Town Manager
Merrimack, NH

cc: Merrimack Town Council
Maggie Hassan, Governor of New Hampshire
Joseph Foster, Attorney General of New Hampshire
Shawn Jasper, Speaker of the New Hampshire House of Representatives
Chuck Morse, President of the New Hampshire State Senate
Kelly Ayotte, U. S. Senator
Jeanne Shaheen, U. S. Senator
Frank Guinta, U. S. House of Representatives
Ann McLane Kuster, U. S. House of Representatives
David K. Wheeler, Executive Council
Gary Daniels, New Hampshire State Senate
John L. Balcom, New Hampshire House of Representatives
Richard W. Barry, New Hampshire House of Representatives
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