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15 Research Drive
Amherst, Massachusetts 01002
Tel 413.256.0202 Fax 413.256.1092
www.swca.com

July 5, 2023

Mr. Frank Kaputa, Chairperson
Inland Wetlands and Watercourses Commission
2155 Main Street
Glastonbury, CT 06033
860-652-7510

Sent electronically to: Suzanne Simone, Environmental Planner, suzanne.simone@glastonbury-ct.gov

Re: Algonquin Gas Transmission, LLC
Mainline System Anomaly Investigation Project, Milepost 6.34, Dig 5737
Glastonbury, Connecticut

Dear Mr. Kaputa,

Algonquin Gas Transmission, LLC (Algonquin) operates an existing interstate natural gas transmission system pursuant to the Natural Gas Act, 15 U.S.C. § 717 et seq. and the Natural Gas Pipeline Safety Act, 49 U.S.C. § 60101 et seq. As part of its obligation under federal law to maintain the safety and reliability of its facilities, Algonquin is required by U.S. Department of Transportation (USDOT), Pipeline and Hazardous Materials Safety Administration Regulations (Chapter 49 of the Code of Federal Regulations Section 192 Department of Transportation Regulations for "Transportation of Natural and other Gas by Pipeline") to routinely monitor its pipelines for segments which require attention and address them in a timely fashion to protect the public and to ensure Algonquin's compliance with federal pipeline safety regulations. Please note that the work involved is designed to ensure the continued safe operation of the existing pipeline system and does not increase the pipeline's capacity or the amount of natural gas which could flow through it.

As part of its obligation under federal law to maintain the safety and reliability of its facilities, Algonquin conducts regularly scheduled internal inspections of their natural gas pipeline transmission systems using internal inspection tools commonly known as "pigs". These internal pipeline tools perform a variety of data collection functions as they pass through the pipe. Algonquin recently performed a pipeline investigation of their existing Mainline natural gas pipeline in Glastonbury. As a result of this investigation, a pipeline anomaly near milepost 6.34, located within the existing pipeline easement, was identified that requires further investigation and potential repair (refer to the enclosed mapping for the site location). Anomalies found during the internal tool runs are commonly indications of pipe irregularities such as dents or corrosion. The anomaly investigation is located in Glastonbury and will require construction access to proceed west through the existing easement from Thompson Street. The proposed access to milepost 6.34 and the workspace for the anomaly investigation will temporarily impact one palustrine emergent wetland and proceed through the associated upland review area, all within the right-of-way (ROW).

This work will be performed in accordance with the Federal Energy Regulatory Commission's (FERC's) blanket certificate procedures, which allow for the maintenance of natural gas transmission facilities that are appurtenant to existing facilities that were originally built under a FERC certificate, without the requirement of proceeding through a new certificate process. Because Algonquin's planned work falls within the federal regulatory framework, local permits are not applicable.

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Algonquin is providing this letter as a courtesy notification to the Glastonbury Inland Wetlands and Watercourses Commission regarding the anomaly investigation project. A brief description of the project and the mitigation measures that will be implemented during the work is provided below in the following sections.

Project Description

As identified in the enclosed mapping, Algonquin is proposing an anomaly investigation project located in the Town of Glastonbury, which will be applied to Algonquin's existing Mainline pipeline system. The proposed project will take place entirely within the existing Algonquin maintained ROW. Access to the workspace will come from Thompson Street and proceed west through the existing ROW to the anomaly investigation site. Temporary workspace will also be located east of Thompson Street, located within Algonquin's existing easement. To minimize temporary impacts, appropriate erosion and sediment controls will be utilized to prevent sedimentation into wetlands. To investigate the anomaly, a medium-sized excavator will dig a trench to a depth of approximately 5 to 10-feet to expose the pipeline. The excavated material will be stockpiled within the temporary workspace located in Algonquin's ROW. Following excavation, the pipe will be sandblasted to bare metal and the pipe surface will be visually inspected for evidence of corrosion defects. Depending on the severity of the corrosion identified during pipe inspection, remedial measures may include pipe recoating, installing a reinforcement sleeve or replacing a section of pipe. The repair will not require realignment or change in depth of the existing pipe.

Once the work is completed, workers will backfill the trench with the excavated spoil and restore the areas to original conditions in accordance with the company Erosion and Sedimentation Control Plan (E&SC Plan). All proposed work will be conducted within Algonquin's existing, cleared and previously disturbed ROW. The process of excavation, investigation and remediation typically requires two weeks to complete depending on the site conditions and weather. The maintenance work is proposed to start in August of 2023.

Existing Environment

At the anomaly investigation location, all work will be conducted within the existing, maintained pipeline ROW and only herbaceous ground cover grows within the ROW at this site. The project location within the pipeline ROW abuts residential and forested area.

Construction Sequence

The following is a general construction sequence for the anomaly investigation and repair work:

1. Access anomaly investigation from Thompson Street, continue west to milepost 6.34
2. Implement erosion controls as necessary;
3. Excavate at anomaly site and dewatering best management practices as necessary;
4. Clean off the pipe;
5. Investigate the anomaly visually and repair, sandblast, and re-coat the pipe as needed;
6. Backfill the excavation;
7. Restore the site to preconstruction conditions, including seeding all previously vegetated, disturbed areas in accordance with Erosion and Sedimentation Control (E&SC) Plan, and;

8. Remove perimeter erosion control barrier as necessary after the site has been stabilized.

Flood Zone

The project is not located within any FEMA Flood Zones (09003C0545F, effective 9/26/2008).

CT Natural Diversity Database

The project is located within Natural Diversity Database habitat (December 2022 mapping). Algonquin has completed consultation with the Natural Diversity Database Program and is committed to implementing all mitigation measures recommended by the Natural Diversity Database Program.

Wetlands and Waterbodies

The proposed access to milepost 6.34 and project workspace is located within the upland review area. All workspace and access roads are located completely within the existing ROW. Erosional controls and other stormwater management practices will be utilized to prevent impact to the surrounding wetlands and waterbodies in accordance with Algonquin's E&SC Plan.

Erosion and Sedimentation Control Plan (E&SC Plan)

The following describes the procedures that will be implemented during construction and restoration following the anomaly investigation. Best management practices, such as timber mats, silt fence and straw bales, will be utilized as necessary to avoid and minimize impacts to surrounding resources and the associated upland review area. All impacts will be temporary, and all areas of disturbance will be restored to preconstruction condition and stabilized in accordance with Algonquin's E&SC Plan.

Algonquin's E&SC Plan has been prepared for use by Algonquin and its contractors as a guidance manual for minimizing erosion of disturbed soils and transportation of sediments off the ROW and into sensitive resources (wetlands, streams, and residential areas) during natural gas pipeline construction. The procedures developed in the E&SC Plan are designed to accommodate varying field conditions while maintaining rigid minimum standards for the protection of environmentally sensitive areas.

The goal of the E&SC Plan is to preserve the integrity of environmentally sensitive areas and to maintain existing water quality by implementing the following objectives:

- Minimize the extent and duration of disturbance;
- Protect sensitive resources from erosion of exposed soil by diverting runoff to stabilized areas;
- Install temporary and permanent erosion control measures; and
- Establish an effective inspection and maintenance program.

Algonquin's E&SC Plan is available upon request.

Clean Up and Restoration

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The construction work area will be stabilized and restored to pre-construction conditions upon the completion of the project. All construction related debris would be removed from the Site.

This routine maintenance project is part of Algonquin's ongoing integrity maintenance program. If you have any questions regarding this notification, please do not hesitate to contact me at 207-509-4386 or via email at katelyn.wheeler@swca.com.

Sincerely,
SWCA

Katelyn Wheeler
Environmental Permitting Specialist

cc: Brian Colabella, Algonquin

Preemption Statement
Notwithstanding anything to the contrary set forth in this correspondence, nothing stated herein shall be construed to indicate that any state, regional, or local agency referred to has the power to impose any requirement inconsistent with Federal law or to refuse to issue or to unreasonably delay the issuance or processing of any state, regional, or local permit, license, certificate, approval, review, or other requirement: nor shall this correspondence be construed to limit Algonquin's legal rights under the Natural Gas Act (15 U.S.C. § 717, *et seq*.), Pipeline Safety Act (49 U.S.C. § 60,101, *et seq*.), or the United States Constitution, including, but not limited to, the Supremacy Clause and Commerce Clause.

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Attachment A
USGS Topographical Map

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Attachment B
Aerial Map