

August 18, 2017

Memorandum on Atlantic Coast Pipeline Project

To: Robert Payne, Acting Director, Office of Drinking Water
Arlene Warren, Policy and Planning Specialist

Through: Allen Knapp, Director, Office of Environmental Health Services
Virginia Department of Health

From: Lance Gregory, Program Administration Manager
Virginia Department of Health

RE: Comment regarding the Final Environmental Impact Statement for the Atlantic Coast Pipeline.

This is in reply to your request for comments on the Final Environmental Impact Statement (FEIS) for the Atlantic Coast Pipeline (ACP). This correspondence is to follow up to previous comments, dated January 27, 2017, from the Office of Environmental Health Services (OEHS) regarding the Draft Environmental Impact Statement for the ACP.

As previously noted, protecting water quality for property owners that are reliant upon springs, cisterns, and private wells is a paramount concern. The FEIS notes that field surveys for water wells and springs have not been completed due to a lack of survey access. The FEIS recommends that field surveys for wells and springs within 150 feet of the construction workspace (500 feet in karst terrain) be completed prior to construction. OEHS recommends that a complete sanitary survey along the pipeline's path be performed by a team of persons with expertise in geology, hydro-geology, epidemiology, and public health. OEHS recommends that a sanitary survey within at least 1,000 feet on either side of the pipeline be performed to ensure people and properties using local and regional groundwater and surface water for recreational use or human consumption are identified and protected. The sanitary survey should also include all private wells and springs identified as potential receptors as part of ACP's Karst Mitigation Plan.

OEHS has provided available electronic information to ACP regarding the location of private wells constructed in the proposed project area. However, electronic records were only available for private wells constructed since 2003. OEHS recommends that the project team performing the sanitary survey contact each local health department in the project area to obtain hard copy records to assure appropriate separation distances will be maintained between the proposed pipeline and private wells, springs, or cisterns serving nearby properties.

OEHS also recommends that the project team leading the sanitary survey project identify onsite sewage systems near the pipeline's final path. ACP has committed to route around onsite sewage systems if possible, and to work with property owners to relocate onsite sewage systems that cannot be avoided. Property owners must submit an application to the local health department to relocate any onsite sewage system impacted by the pipeline's construction.

Lastly, OEHS recommends that the Federal Energy Regulatory Commission (FERC) and ACP acknowledge and address public comments received for the pipeline. This includes comments received for the FEIS as well as comments received during all public meetings and hearings on the proposed project. It is our understanding that there have been requests from the public to hold additional hearings on the project. OEHS asks that FERC and ACP engage with VDH regarding any meeting, permits, plans, and studies performed throughout the project so VDH can provide additional information and informal comments as necessary throughout the process