

DEP Permit # E06-701
DEP Permit HDD Reference # PA-BR-0071.0000-RD-16
DEP HDD # S3-0200
Township – Cumru & Spring
County - Berks
HDD Site Name – Highway 222 Crossing

2nd Public Comment Period

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1. Comment

On May 22, 2019, the Department requested additional information from Sunoco regarding its reevaluation (“Report”) of the horizontal directional drilling (“HDD”) indicated by drawing number HDD PA-BR-0075.0000-RD-16 (the “Site”). Sunoco responded on August 30, 2019, supplementing the Report. Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 (“Order”), and on behalf of Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network (“Appellants”), please accept these comments regarding the Department’s request and Sunoco’s August 30, 2019 response (“August Response”). Appellants have responded to each item using the Department’s numbering in its May 22 letter.

1. Inconsistencies and inaccuracies

The Department rightly asked Sunoco to correct confusing and contradictory references throughout its report. Appellants note that the incorrect drawing number still appears in multiple plan views in the Report.

2. Water supply protection

Sunoco supplies water well test results from 17 wells. Per paragraph 8 of the Order, Sunoco was to have offered landowners within 450 feet of the alignment testing before, during, and after start or re-start of the HDD. Not a single one of the test results shows testing for all of before, during, and after start or re-start of the HDD. It is the case that all the landowners refused the full course of testing? That is unclear but should be made clear. The lack of sequential tests also makes it difficult to determine whether drilling caused changes in water quality. Sunoco included more than one sample for only four of the 17 wells. Of those four, three had an increase in turbidity.

The results of the testing are concerning in some instances. First of all, the drinking water standards in the rightmost column of the results pages are incomplete. They should note that any positive results for bacterial contamination are unacceptable. See <https://quantumlabs.net/wp-content/uploads/2013/09/DEP-Standards-April-2006.pdf>. They should also note that the Department has an MCL for pH which it considers a “reasonable goal for drinking water quality”: 6.5-8.5. *Id.* Both of these standards have been not met during HDD construction at the Site in some of the wells. For example, Sunoco detected enteral bacteria during drilling in the Hirniesen, Kohler, Wyomissing Cemetery, and Gajewski wells, which is unacceptable. The Kohler and Wyomissing Cemetery wells in particular had high coliform numbers. Overly acidic water was detected in the Groff, Ochs #2, Stoner, Schwartz, Wyomissing Cemetery, Kohler, and Seidel wells during drilling.

In sum, Sunoco is not justified in reaching the rosy conclusion in presents in the August Response when it writes,

The absence of identifiable impacts to groundwater quality and any water well complaints prove that the best management practices that SPLP has implemented to date at this location have been effective at protecting the local residential well water supplies. As a result, SPLP does not plan on developing or implementing any new practices at this time to protect groundwater quality...

The data is scant but, as noted above, concerning for certain wells, in particular the bacterial contamination. Bacterial contamination has been possibly the most dangerous well contamination issue caused by Sunoco’s drilling. The Department should require Sunoco to meet its requirements under the Order to offer sampling

before, during, and after drilling, and to show how it will avoid causing bacterial contamination of neighboring water wells.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (1-5)

Letter – [Clean Air Council – 9-8-19 – Highway 222 Crossing](#)