

From: [Kevin Fortner](#)
To: [Elizabeth Rorie](#)
Subject: FW: Comments to ANR Pipeline Draft SOP Permits
Date: Wednesday, March 18, 2015 9:24:47 AM

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Hello Elizabeth, I did not get this sent to you the first attempt. Please find attached our comments to the draft permits.

From: Kevin Fortner
Sent: Wednesday, March 18, 2015 9:11 AM
To: julie.harse@tn.gov; James.W.; Dan.Hatch@tn.gov; Eliza.Korie@tn.gov
Cc: Chris Menefee
Subject: Comments to ANR Pipeline Draft SOP Permits

Please find attached comments to the draft SOP's for the ANR Pipeline Company's Brownsville and Cottage Grove, TN facilities. Hard copies of these documents have been mailed to the Snodgrass Tower in Nashville.

M. Kevin Fortner
Environmental Field Specialist
615-465-5107 (Office)
713-817-3599 (Cell)

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March 17, 2015

Mr. Vojin Janić:

State of Tennessee
Department of Environment and Conservation
Division of Water Resources
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

Re: Comments for Draft Permit No. SOP-99012
ANR Pipeline Company, Brownsville Compressor Station
Brownsville, Haywood County, Tennessee

Dear Mr. Janić:

Thank you for the opportunity to review Draft Permit No. SOP-99012. TransCanada has reviewed the draft permit for the Brownsville Compressor Station and has several comments and proposed revisions to the permit.

TransCanada is proposing revisions to the Draft Permit language below. The Draft language has been struck r and the proposed language has been underlined and bolded for easier recognition of the suggested permit language.

Comment 1: Part 1- Permit Conditions and Requirements, page 4, Log requirements.

The language in the draft permit requires TransCanada to maintain a log of all water pumped from the evaporation pond. The requirements for the content of the log are as follows:

The permittee must keep a log of the following:

- i. date of pump and haul*
- ii. facility name where wastewater is disposed/hailed*
- iii. facility address where wastewater is disposed/hailed*
- iv. amount of wastewater hauled*
- ~~*v. amount of sludge generated*~~
- vi. how sludge is disposed*
- vii. any operational problems encountered during pump and haul must be noted in the log.*

TransCanada suggests removing log content requirements V and VI because TransCanada does not expect to generate any sludge from the evaporation pond. Most of the solids in the wastewater that is pumped from the pond should remain in a suspended or dissolved state and will be removed along with the wastewater that is pumped from the evaporation pond.

Comment 2: Part 2 - Permit Conditions and Requirements, page 4, subpart i. Disposal Facility Requirements

The language in the Draft Permit requires Jackson Field Office approval of both the wastewater disposal facilities. While TransCanada understands the need for the Tennessee Department of Environment and Conservation (TDEC) to ensure proper disposal of wastewater, the proposed permit language requiring TDEC approval of disposal facility unnecessarily limits TransCanada's flexibility in selecting optimal disposal for the wastewater from the evaporation pond. TDEC proposes to limit providers, without adding assurances regarding suitability of facility or limitations on liability

Flexibility in the selection of disposal facilities is required for commercial, management and environmental factors. For example, TransCanada's current practice is to pump down the evaporation pond in advance of predicted, severe storm events. Because a predicted, severe storm event might require the removal of multiple truckloads of wastewater in a short time period, TransCanada could be required to select additional wastewater disposal facilities on short notice that could accept wastewater from the pond for treatment and disposal but were not approved by TDEC for wastewater disposal. If TDEC approval for the additional disposal facilities could not be secured in time to remove the water from the evaporation pond, TransCanada could be faced with either violating a permit condition or overflowing the evaporation pond.

TransCanada suggests the following changes to the permit language:

*The wastewater must be disposed of at a facility **that has the appropriate permits, approvals, and waste treatment and disposal processes to manage the wastewater from the evaporation pond.***

Comment 3: Part 2 - Permit Conditions and Requirements, page 4, subpart i., Manifest Requirements

Waste manifest forms are standardized and have been developed by transporters and waste treatment facilities to ensure that wastes are properly identified and managed during the transportation and disposal process in accordance with DOT requirements. Because transporters and disposal facilities have primary control over manifest forms, TransCanada cannot alter the waste manifest that is used to ship a load of waste. Additionally, manifests may change depending upon changes in regulations or the needs of the waste transporter and disposal facility. TransCanada proposes the following change to the permit language.

The transport and ultimate disposal of the wastewater must be documented by a an appropriate manifest system. ~~on forms approved by the Jackson Environmental Field Office.~~

TransCanada further recommends the following modifications to the final permit. *The permittee shall also record on the manifest forms, the number of loads hauled, the volume of each load, the dates of hauling, the name and/or signature of an authorized representative of waste transporter and TransCanada and the names of people present. A copy of the manifest must be submitted to the Jackson Environmental Field Office on a monthly basis.*

During wet periods of the year, TransCanada expects that several hundred loads of wastewater may be shipped to an appropriate disposal facility in a given month. As a result, copying or scanning copies of the manifest and providing copies of manifests to TDEC could become a very time consuming activity in a given month. The draft permit requires TransCanada to keep and maintain records associated with the permit for three years made available for TDEC review. TransCanada believes that maintaining copies of manifests on-site for three years and making the manifests available for TDEC review is sufficient for TDEC to be assured that wastewater from the evaporation ponds is being properly transported for disposal.. TransCanada requests the following language be deleted from the final permit. *A copy of the manifest must be submitted to the Jackson Environmental Field Office on a monthly basis."*

I welcome the opportunity to discuss these comments at your convenience if you have questions., Please contact me at 615-465-5107.

Respectfully,



M. Kevin Fortner

cc: Julie Harse, TDEC

James Scott, Jackson Field Office - TDEC

Ken Lewis, Jackson Field Office - TDEC

Brownsville Station files