Federal Railroad Administration

Appalachian NGL Hub Rail Transloading Facility

FINDING OF NO SIGNIFICANT IMPACT

Submitted Pursuant to 42 U.S.C. 4332 (2)(c)
By the
U.S. Department of Transportation
Federal Railroad Administration

1. INTRODUCTION

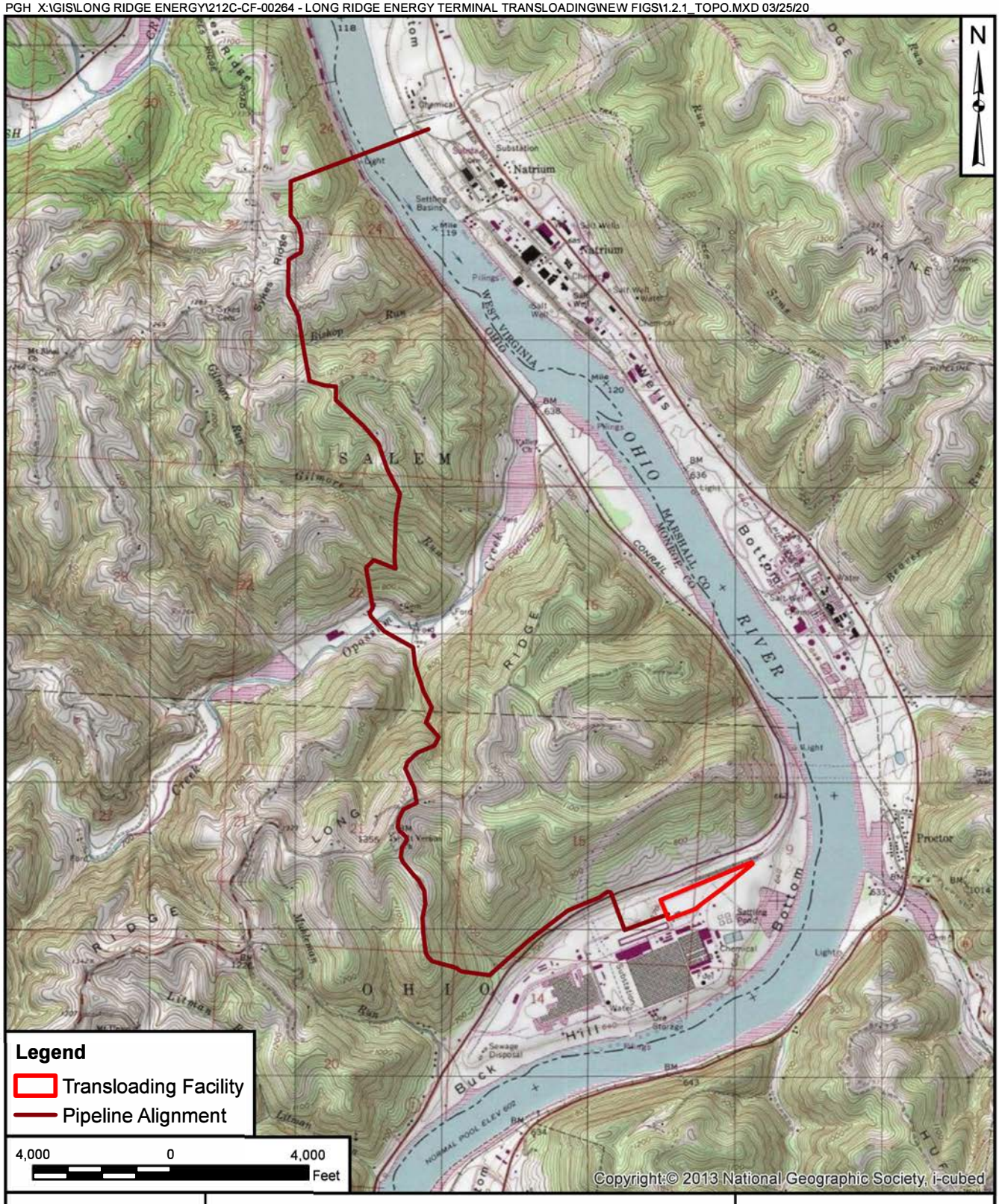
The proposed Appalachian NGL Hub Rail Transloading Project (the Project) will be constructed by Ohio River Partners Shareholder LLC (doing business as Long Ridge Energy Terminal (LRET)) to support the continued need for transportation of Natural Gas Liquids (NGL) to end-use markets. The Project consists of the construction of a new transloading facility (the Transloading Facility) in Hannibal, Ohio, for which funds have been awarded to Monroe County by the Federal Railroad Administration (FRA). Additionally, the Project includes an associated, privately-funded 10-inch diameter pipeline (the NGL Pipeline). The NGL Pipeline will transport NGLs from the existing gas processing facility owned by Blue Racer Midstream (Blue Racer) in Natrium, West Virginia, crossing under the Ohio River into Ohio and ultimately terminating approximately 5.9 miles to the southeast at the new Transloading Facility (Figure 1). The Transloading Facility will facilitate loading NGLs from the pipeline onto railcars for shipment out of the region to extra-regional processing facilities and end-use markets.

In 2018, Monroe County, Ohio was selected for a grant from the US Department of Transportation's (US DOT) Better Utilizing Investments to Leverage Development (BUILD) program for grant funding for construction of the Project. The $20 million grant, administered through the FRA, offsets the total cost of approximately $40 million for the Transloading Facility. The construction of the NGL pipeline is also a part of the Project, but only the Transloading Facility is Federally-funded.

Therefore, FRA must comply with the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) prior to authorizing Monroe County to use DOT funds and commence construction of the Project. NEPA requires federal agencies to consider the impacts of their actions on the natural, social, economic, and cultural environment and to disclose those considerations in a public document. The NEPA process helps public officials make decisions with an understanding of the potential environmental impacts.

This Finding of No Significant Impact (FONSI) has been prepared to comply with the NEPA, as amended, 42 U.S.C. §§ 4321 *et seq.*, its implementing regulations (40 CFR parts 1500-1508); 23 CFR Parts 771 and 774; and related laws. FRA has made this FONSI based on information included in the Environmental Assessment (EA). The EA is incorporated by reference to this FONSI.

PGH X:\GIS\LONG RIDGE ENERGY\212C-CF-00264 - LONG RIDGE ENERGY TERMINAL TRANSLOADING\NEW FIGS\1.2.1_TOPO.MXD 03/25/20



TETRA TECH

PROJECT LOCATION (USGS)

APPALACHIAN NGL HUB RAIL TRANSLOADING FACILITY
MONROE COUNTY, OHIO

DRAWN BY: M. SCOTT 03/25/20
CHECKED BY: L. DRANE 03/25/20
UPDATED BY: L. DRANE 08/05/20

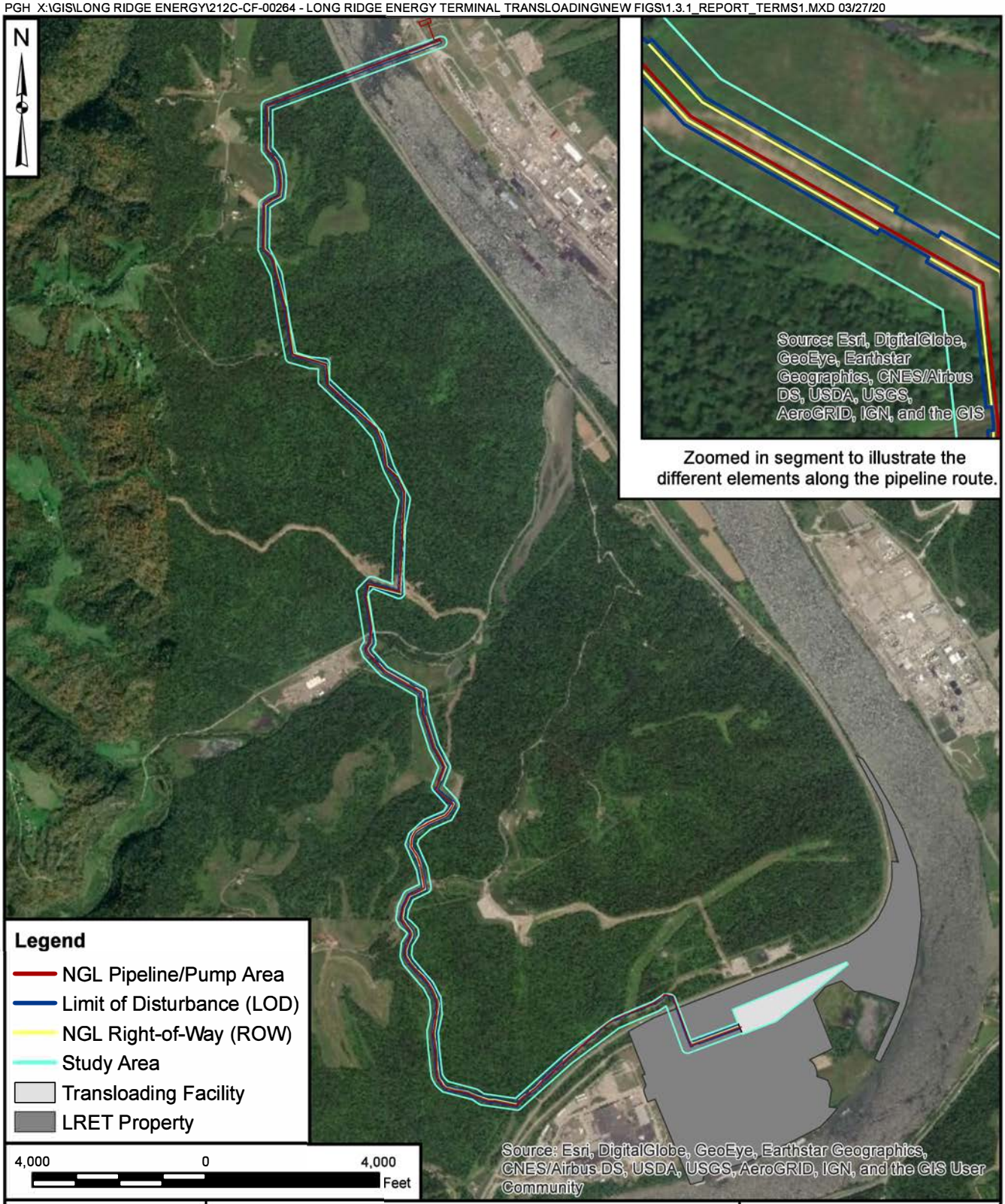
CONTRACT NUMBER:212C-CF-00264

FIGURE NUMBER	REV
1	0

2. STUDY AREA

The Study Area for the Project is located in the Ohio River Valley and starts along the Ohio River in Marshall County, West Virginia, crosses under the Ohio River into Monroe County, Ohio (Figure 2). The Project begins in an industrial area on the east side of the Ohio River in West Virginia. After it crosses the Ohio River, the approximately 5.9-mile corridor crosses several ridge and valleys as it meanders southward. Except for the beginning and the end of the linear portion which are in industrial areas, the majority of the linear portion is a mixture of wooded areas, agricultural fields, and rural residential. The elevation along the linear portion ranges from approximately 650 feet above mean sea level (ft-amsl) at the beginning in West Virginia up to approximately 1350 ft-amsl at the highest ridge point. The Project terminates in a former industrial facility that is currently be redeveloped and is located along the western bank of the Ohio River. Overall, the Study area is rural and industrial.

PGH X:\GIS\LONG RIDGE ENERGY\212C-CF-00264 - LONG RIDGE ENERGY TERMINAL TRANSLOADING\NEW FIGS\1.3.1_REPORT_TERMS1.MXD 03/27/20



TETRA TECH

DESCRIPTION OF REPORT TERMS

APPALACHIAN NGL HUB RAIL TRANSLOADING FACILITY
MONROE COUNTY, OHIO

DRAWN BY: M. SCOTT 03/23/20
CHECKED BY: L. DRANE 03/27/20
UPDATED BY: L. DRANE 08/05/20

CONTRACT NUMBER:212C-CF-00264

FIGURE NUMBER	REV
2	0

3. PURPOSE AND NEED STATEMENT

The purpose of the Project is to allow for the safe and efficient movement of NGL's from the region in commercial quantities to east coast markets by using existing rail networks in proximity to processing facilities. The Project is needed to address the demand for increased rail capacity to allow for expanded NGL distribution from the region.

The Marcellus and Utica Shale of the Appalachian Basin is one of the largest gas fields in world. According to data provided through the Energy and Information Administration (EIA, 2020), natural gas production has increased over 84 percent since 2015, and continues to increase. As of January 2020, natural gas from the Appalachian Basin accounted for 39 percent of US natural gas production. The challenge of moving natural gas and NGLs from the rural areas of Appalachia, such as eastern Ohio and West Virginia's Northern Panhandle, is complex. Pipeline capacity has not kept up with demand. While there are pipeline projects planned, they are difficult to permit and slow to come online. Another challenge is that NGL facilities have limited rail capacity to move energy products. Furthermore, the existing regional fractionation facilities cannot meet the current and growing processing demand for NGL constituents such as ethane, butane and propane.

The US Department of Energy (DOE) Primer published June 27, 2018, projects that Appalachian NGL products will increase over 700 percent from 2013 to 2023 (US DOE 2018) and states that rail capacity is critical "as produced volumes do not align with the high seasonal variability in demand and often exceed pipeline takeaway capacity." If no new alternatives are constructed to move NGLs, then the fuel becomes stranded. Rail transportation can expand NGL distribution capabilities, allowing NGLs to be delivered directly to end users in a safe and reliable manner. Considering the location of the LRET, the access to rail infrastructure and the availability of NGLs from the area make this a good location for this type of development and enhanced infrastructure.

4. ALTERNATIVES

LRET conducted a preliminary alternatives analysis as part of early planning work to determine options for locations for the Transload Facility and the NGL Pipeline. LRET evaluated two layout options for the Transloading Facility and four alignments for the NGL Pipeline prior to the EA process as part of this early planning work. LRET used evaluation criteria, as shown in Section 2.1 of the EA, to examine potential impacts of the options. After this preliminary alternative analysis, options were dismissed based on the evaluation criteria. The evaluated alternative in the EA (the Build Alternative), was the result of the application of the evaluation criteria.

4.1 No Action Alternative

Transloading Facility

Under the No Action Alternative, the Transloading Facility will not be constructed. Export potential of large volumes of NGL and constituent products will be inhibited and unable to come to market. This could cause a delay of extraction of resources that could make it difficult in industry expansion and the economic health of rural areas of eastern Ohio and Northern West Virginia.

Under the No Action Alternative, the local rail infrastructure will not be improved to load and transport NGLs from the region, bringing construction and operations jobs. New businesses looking to capitalize on the planned infrastructure improvements would seek alternative locations. No new jobs will be created and there will be no economic benefit to rural communities in eastern Ohio and Northern West Virginia.

NGL Pipeline

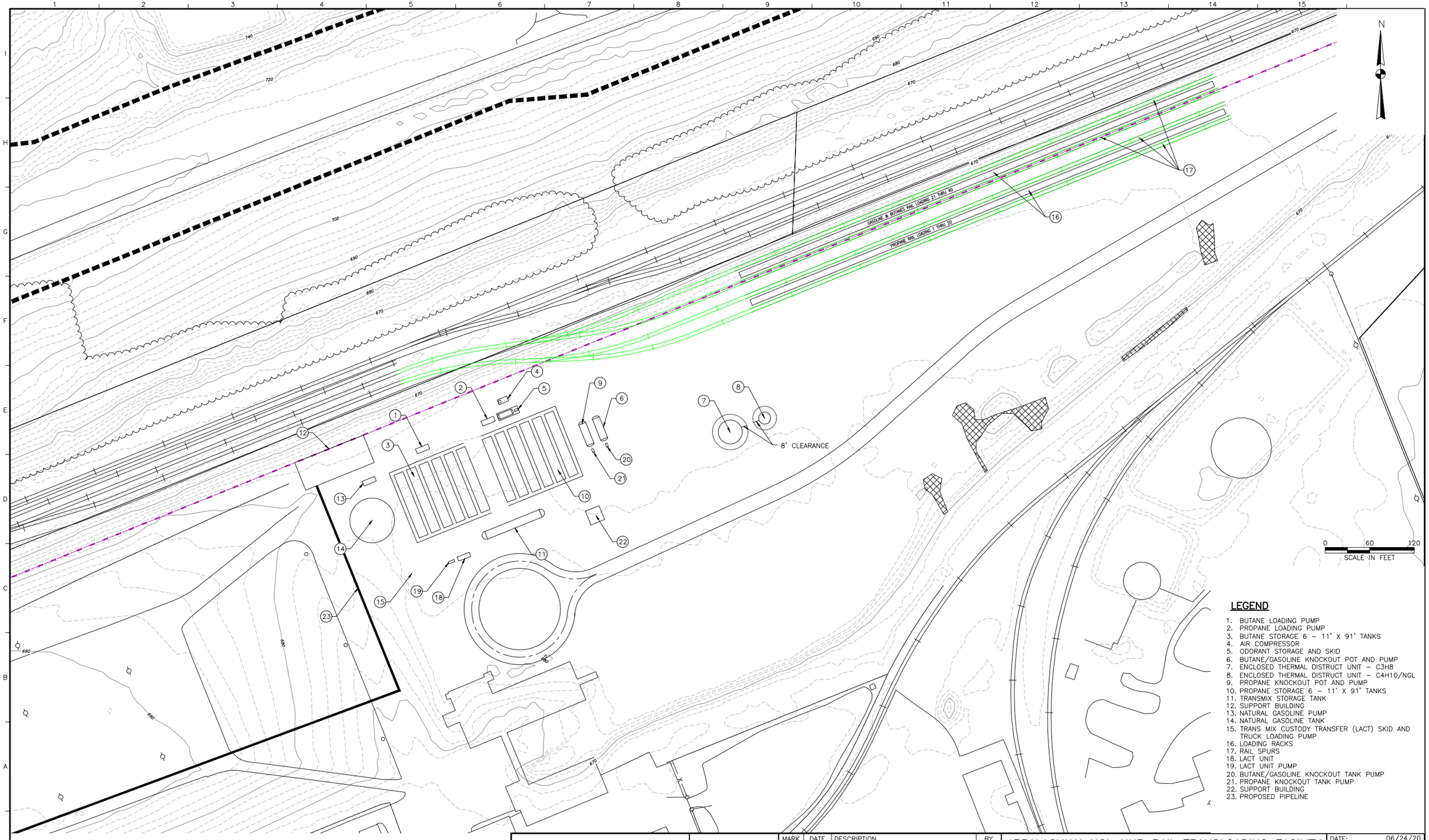
Under the No Action Alternative, the NGL Pipeline will not be constructed as it is dependent on the construction of the Transloading Facility to move NGL by rail. The No Action Alternative will not allow a safe and efficient method for transporting the NGLs from the Blue Racer facility; therefore, there will be no product available to load at the Transloading Facility. The Blue Racer facility is the closest producer of NGLs and other facilities in the region, and without the proposed NGL Pipeline and Transloading Facility, an extensive pipeline will be required to transport the NGLs to another Transloading Facility or market.

4.2 Build Alternative (Preferred Alternative)

As discussed in Section 2.2 of the EA, LRET considered and dismissed several alternatives for the Transloading Facility and the NGL Pipeline. Alternative 2 for the Transloading Facility and Alternative D for the NGL Pipeline were carried forward for evaluation in the EA and constitute the Build Alternative. FRA reviewed the Build Alternative and finds that it meets the purpose and need of the Project. Figures 3 and 4 illustrate the Build Alternative.

Transloading Facility

The Build Alternative includes a 17-acre site that is located on the LRET Property. New rail spurs will extend from the existing spurs to the west of the proposed Transloading Facility. The Transloading Facility will be located in the vicinity of the main rail line which will reduce the amount of new track needed for the project. The Build Alternative includes time saving steps to efficiently



LEGEND

1. BUTANE LOADING PUMP
2. PROPANE LOADING PUMP
3. BUTANE STORAGE 6 – 11' X 91' TANKS
4. AIR COMPRESSOR
5. ODORANT STORAGE AND SKID
6. BUTANE/GASOLINE KNOCKOUT POT AND PUMP
7. ENCLOSED THERMAL DISTRUCT UNIT – C3H8
8. ENCLOSED THERMAL DISTRUCT UNIT – C4H10/NGL
9. PROPANE KNOCKOUT POT AND PUMP
10. PROPANE STORAGE 6 – 11' X 91' TANKS
11. TRANSMIX STORAGE TANK
12. SUPPORT BUILDING
13. NATURAL GASOLINE PUMP
14. NATURAL GASOLINE TANK
15. TRANS MIX CUSTODY TRANSFER (LACT) SKID AND TRUCK LOADING PUMP
16. LOADING RACKS
17. RAIL SPURS
18. LACT UNIT
19. LACT UNIT PUMP
20. BUTANE/GASOLINE KNOCKOUT TANK PUMP
21. PROPANE KNOCKOUT TANK PUMP
22. SUPPORT BUILDING
23. PROPOSED PIPELINE

TETRA TECH
www.tetratech.com
6715 TIPPECANOE ROAD, SUITE C201
CANFIELD, OH 44406
T: (330) 286-3683 | F: (330) 286-3573

MARK	DATE	DESCRIPTION	BY

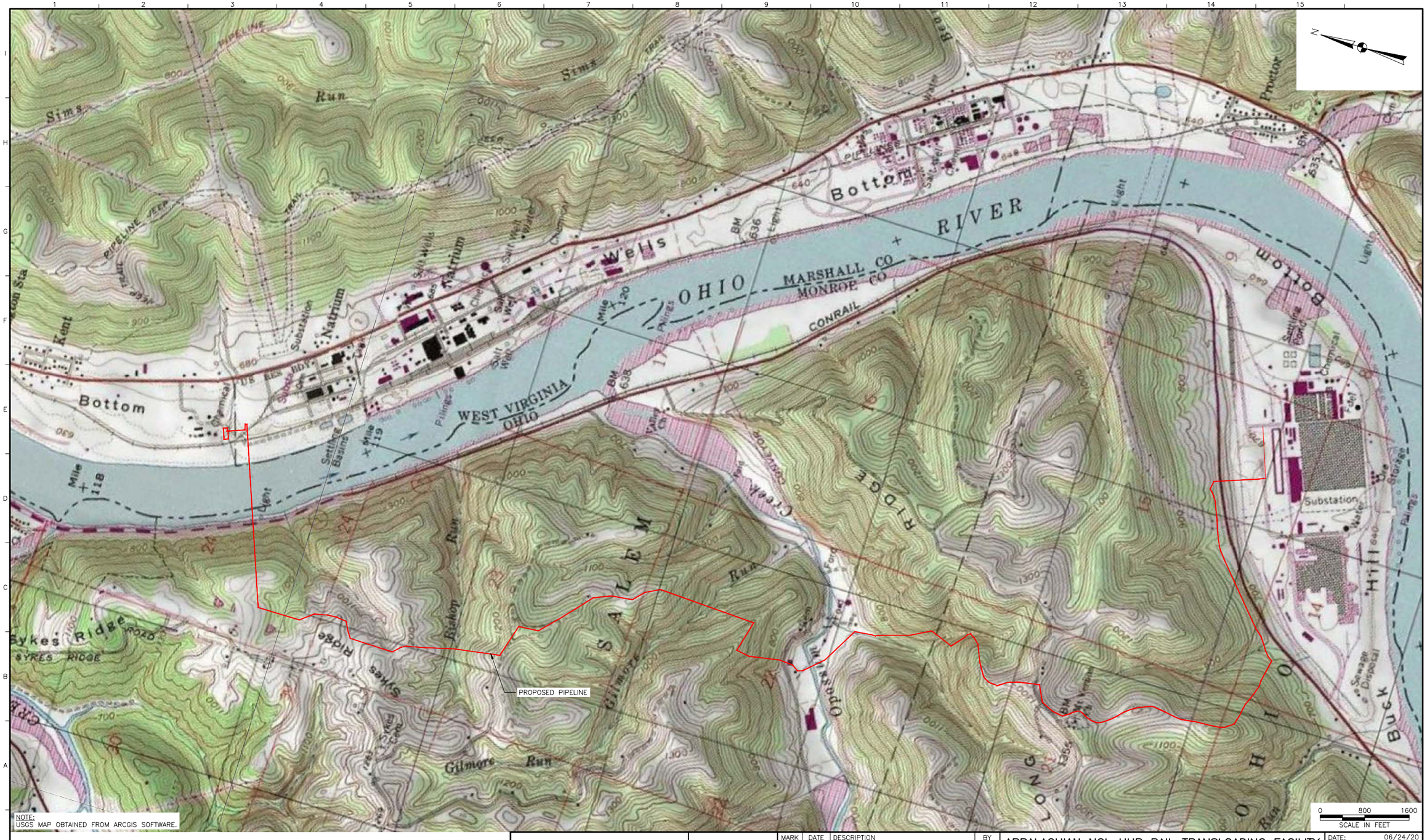
APPALACHIAN NGL HUB RAIL TRANSLOADING FACILITY
MONROE COUNTY, OHIO

PROPOSED ACTION
TRANSLOAD FACILITY

DATE:	06/24/20
PROJECT NO.:	212C-CF-00264
DESIGNED BY:	LD
DRAWN BY:	JZ
CHECKED BY:	LD
SHEET:	– OF –

FIGURE 3

X:\CADD\Long Ridge Transloading\212c-cf-00264\FIGURES\FOR SUBMITTAL\FIGURE 2.3.1.dwg PIT JIM.KUSIOWSKI 6/24/2020 5:45:52 PM



PROPOSED PIPELINE

TETRA TECH

www.tetratech.com

6715 TIPPECANOE ROAD, SUITE C201
CANFIELD, OH 44406
T: (330) 286-3683 | F: (330) 286-3573

MARK	DATE	DESCRIPTION	BY

APPALACHIAN NGL HUB RAIL TRANSLOADING FACILITY
MONROE COUNTY, OHIO
PROPOSED ACTION–PIPELINE
USGS MAP

DATE:	06/24/20
PROJECT NO.:	212C-CF-00264
DESIGNED BY:	LD
DRAWN BY:	JZ
CHECKED BY:	LD
SHEET:	– OF –

FIGURE 4

X:\CADD\Long Ridge Transloading\212c-cf-00264\FIGURES\FOR SUBMITTAL\FIGURE 2.3.3.dwg PIT JIM.KUSIOWSKI 3/30/2020 11:19:16 AM

fill the tank cars by providing on-site storage to help buffer and speed up the rail car loading, from which rail cars can be loaded concurrently as NGL is pumped via pipeline from the Blue Racer facility. The tank farm includes six 60,000 gallon propane tanks (total storage capacity of 360,000-gallons), six 60,000 gallon butane tanks (total of 360,000-gallons of storage capacity), and a 630,000 gallon condensate/natural gasoline tank. The respective NGL products will be loaded into the rail cars through pipe racks that will be situated between the rail spurs. As NGL fuel types are switched in the NGL pipeline a commixture of residual product remains and mixes with the initial slug new fuel type. This commixture will be sent to a transmix tank and the commixture of products will be sent back to the Blue Racer facility for reprocessing. Off-gas materials will be burnt through enclosed ground flares.

NGL Pipeline

The Build Alternative includes the construction of a new pipeline from the Blue Racer facility to the proposed Transloading Facility. This approximately 5.9-mile 10-inch pipeline will originate at the Blue Racer facility and cross the Ohio River using an Horizontal Directional Drill (HDD) bore. New pumps will be installed at the Blue Racer facility to pump the NGLs through the NGL Pipeline to the Transloading Facility. One interconnect valve will be above ground, located on the western side of the Ohio River near the HDD bore exit point. This interconnect valve will be within the NGL Pipeline right-of-way (ROW).

The bore will extend the highlands to the west of the Ohio River in Ohio and the pipeline route will continue underground to the south-southeast into the proposed Transloading Facility. The proposed location of the pipeline route was selected to reduce impacts to natural resources. The southern portion of the route is situated so that it takes advantage of an existing pipeline ROW.

5. SELECTED ALTERNATIVE

The Selected Alternative consists of the Build Alternative evaluated in the EA. It best meets the purpose and need of the project. The Selected Alternative was the only build alternative carried forward for further analysis in Section 2.3 of the EA. The No Action Alternative was evaluated as further described in Section 2.3.1 as a basis against which to compare the Build Alternative in evaluation of environmental impacts but was not identified as the Selected Alternative because it did not meet the Project purpose and need.

The Selected Alternative provides a number of benefits, including:

- Creating a time savings from efficiently filling tank cars from on-site storage, which speeds up rail car loading as rail cars can be loaded concurrently with NGL pumping from Blue Racer.
- Providing additional capacity for moving NGL from the region.
- Beneficial impact on socioeconomic resources due to access to both short-term construction jobs and permanent jobs at the Transloading Facility.
-

Based upon the EA, incorporated by reference with its appendices in this FONSI in its entirety, FRA has concluded that the Selected Alternative will have no foreseeable significant impact on the quality of the natural and human environments. The Selected Alternative is best able to achieve the proposed action purpose and need without significant environmental impacts. Minimization and mitigation measures were included in the EA to further reduce environmental impacts, and even without these measures, the environmental impacts would not rise to a level of significance.

6. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENSES

The EA describes the existing conditions in the study area and the potential impacts that would result if the Selected Alternative is implemented. Information was gathered from various sources, including site observations, maps, aerial photography, and local state and federal agency data.

Table 1 summarizes the physical, biological, and human resources detailed in the EA and the applicable Mitigation Measures.

Table 1

Summary of Environmental Consequences and Minimization Measures

Environmental Resource	Environmental Consequences	Mitigation Measures
Geological/Physical Setting (3.1)	No impacts to geological resources are anticipated with the Transloading Facility.	GEO-01: LRET will conduct geotechnical studies to determine the underlying soil bearing capacities and foundation design.
	The NGL Pipeline route was selected to minimize encountering side-slopes and deep narrow stream valleys. When steeper slopes are encountered, the NGL Pipeline route would be orientated so that it runs perpendicular to the contour to the extent possible. Small slides could occur in steeper areas and in areas of water saturated soils.	GEO-02: As required under the Ohio Linear Pipeline Construction Stormwater permit and Ohio Revised Code (ORC) 6111, LRET will return the grade along the pipeline route to pre-construction conditions. Returning the grade to its preconstruction contours will minimize the potential for landslides and slope failures.
	During advancement of the HDD bore through the bedrock, fractures may be encountered, and some minor drilling mud loss would be expected within those fractures. The NGL Pipeline could result in negative impacts through inadvertent return of drilling mud to the surface water.	GEO-03: In accordance with permit for WV 401 WQC, LRET will develop an Inadvertent Return Contingency Plan (IRCP), with contingencies for loss of drilling mud in bedrock fractures. The plan will include monitoring procedures to be implemented during drilling and action plans in the event of inadvertent returns.
Groundwater Hydrology/Water Resources (3.2)	Potential for adverse impact to groundwater resources in the event of an unmanaged spill or release during construction or operation.	GHYD-01: LRET will develop and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the Ohio Construction Stormwater permit and the ORC 6111. This SWPPP will include best management practices (BMPs) that will specifically include dust suppression techniques.
	Potential impacts from spills at the Transloading Facility stem from the use of petroleum products for equipment operation and hazardous materials used during construction, which could contaminate the groundwater.	GHYD-02: LRET will prepare a spill prevention control and countermeasure (SPCC) plan in accordance with 40 CFR 112, Subpart A. This plan will cover all petroleum products that will be stored on the facility and include plans for emergency response in the event of a release.

Environmental Resource	Environmental Consequences	Mitigation Measures
	During advancement of the HDD bore, drilling mud could be lost in the geologic formations that exhibit significant fractures. The inadvertent return of drilling mud into the geologic formations would raise the turbidity of the groundwater in the vicinity of the bore.	GEO-03: In accordance with permit for WV 401 WQC, LRET will develop an Inadvertent Return Contingency Plan (IRCP), with contingencies for loss of drilling mud in bedrock fractures. The plan will include monitoring procedures to be implemented during drilling and action plans in the event of inadvertent returns.
		HAZ-01: LRET will prepare a Soil Management Plan to address encountering contaminated soils. This plan will include soil screening requirements, the oversight or monitoring of soil moving activities by an environmental professional, and contingency plans for the handling, removing, temporarily storing, characterizing, and disposing of contaminated materials. This plan will also include measures for containing, treating, and disposing of stormwater that may contact exposed soils.
		PH-03: Emergency response procedures will be developed by LRET for operation of the pipeline to evacuate any residual materials from that segment of the pipeline to keep them from entering the environment, as mentioned in Section 3.11.3 of the EA. In the event of a release of NGL to the environment, LRET will implement a specific notification program, including notifications to the appropriate emergency response agencies, potentially impacted residents, and regulatory agencies.
Surface Hydrology/Floodplains (3.3)	During construction, surface water runoff in contact with exposed soil would have elevated turbidity and would require treatment prior to discharge.	SHYD-01: LRET will prepare a post-construction stormwater management (PCSM) plan based on the final design and layout. The PCSM plan will include stormwater detention basins and feed the existing stormwater control system at the LRET Property.
	Several streams would be crossed and temporarily impacted for installation of the NGL Pipeline.	SHYD-02: LRET will restore impacted streams to preconstruction conditions upon completion of the pipeline installation in accordance with necessary conditions of applicable US Army Corps of Engineers Nationwide-12/Individual Permit 404 Permit and the Ohio EPA 401 Water Quality Certification.

Environmental Resource	Environmental Consequences	Mitigation Measures
		GEO-02: As required under the Ohio Linear Pipeline Construction Stormwater permit and Ohio Revised Code (ORC) 6111, LRET will return the grade along the pipeline route to pre-construction conditions. Returning the grade to its preconstruction contours will minimize the potential for landslides and slope failures.
		GHYD-01: LRET will develop and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the Ohio Construction Stormwater permit and the ORC 6111. This SWPPP will include best management practices (BMPs) that will specifically include dust suppression techniques.
Aquatic Resources (3.4)	The four wetlands in the Study Area for the Transloading Facility are outside of the construction area.	AQUA-01: In accordance with the Ohio Linear Pipeline Construction Stormwater permit, NWP 12, Section 10, and Ohio EPA 401 WQC, a detailed Erosion and Sediment Control Plan (ESCP) will be developed by LRET prior to initiating construction. LRET will install silt fence at the edge of work areas, as necessary, to prevent movement of silt into wetlands. The fencing will be maintained throughout construction until final site stabilization is achieved. LRET will clearly mark wetland boundaries prior to construction activities. LRET will develop procedures for appropriate dewatering and discharge, including measures to limit erosive forces.
	During advancement of the HDD bore required for the crossing of the Ohio River, drilling mud could be lost in the geologic formations that exhibit significant fractures. The inadvertent return of drilling mud into the geologic formations would raise the turbidity of the groundwater in the vicinity of the bore.	GEO-03: In accordance with permit for WV 401 WQC, LRET will develop an Inadvertent Return Contingency Plan (IRCP), with contingencies for loss of drilling mud in bedrock fractures. The plan will include monitoring procedures to be implemented during drilling and action plans in the event of inadvertent returns.

Environmental Resource	Environmental Consequences	Mitigation Measures
	There will be temporary impacts to wetlands and streams for construction of the NGL Pipeline. These impacts will occur as a result of in-stream construction activities, minor earth disturbances within the stream floodways, or construction on slopes adjacent to stream channels. These activities could result in a temporary localized increase in turbidity levels and downstream sediment deposition. Permanent impacts to water quantity and flow rates are not anticipated, and hydrologic conditions are not anticipated to be impacted.	AQUA-02: In accordance with the Ohio Linear Pipeline Construction Stormwater permit, NWP 12, Section 10, and Ohio EPA 401 WQC, LRET commits to Restoration and Revegetation occurring. LRET will restore areas temporarily impacted by Project construction to preconstruction contours. LRET will revegetate cleared areas as soon as practicable following completion of construction to stabilize exposed areas of soil. Species proposed for the seeding will be selected to ensure compatibility and suitability with surrounding agricultural areas and measures will be instituted to prevent the spread of invasive species through revegetation with native plant species. AQUA-03: Stream Crossing Impact Minimization: LRET will install the NGL Pipeline using techniques to minimize construction-related impacts to surface waters. LRET will comply with permit conditions, and implement BMPs that will avoid or minimize adverse impacts on fish and other aquatic organisms.

Environmental Resource	Environmental Consequences	Mitigation Measures
	Where practicable, routing was adjusted to avoid aquatic resources. LRET anticipates that all wetland crossings would meet the conditions of and be authorized under USACE NWP 12. BMPs (detailed in EA Section 3.4.3) implemented in the NGL Pipeline routing and design phase were used to minimize impacts to aquatic resources.	AQUA-02: In accordance with the Ohio Linear Pipeline Construction Stormwater permit, NWP 12, Section 10, and Ohio EPA 401 WQC, LRET commits to Restoration and Revegetation occurring. LRET will restore areas temporarily impacted by Project construction to preconstruction contours. LRET will revegetate cleared areas as soon as practicable following completion of construction to stabilize exposed areas of soil. Species proposed for the seeding will be selected to ensure compatibility and suitability with surrounding agricultural areas and measures will be instituted to prevent the spread of invasive species through revegetation with native plant species. AQUA-03: Stream Crossing Impact Minimization: LRET will install the NGL Pipeline using techniques to minimize construction-related impacts to surface waters. LRET will comply with permit conditions, and implement BMPs that will avoid or minimize adverse impacts on fish and other aquatic organisms.
	A portion of one forested wetland will be converted to an emergent wetland.	AQUA-04: Wetland and stream impacts will be subject to state and federal permitting requirements. LRET will comply with approved wetland off-set measures or compensation for the conversion of forested wetlands to emergent wetlands, such as restoration, creation, enhancement and/or preservation of wetlands.
Threatened and Endangered Species (3.5)	There are some isolated trees that may require removal at the proposed Transloading Facility and approximately 21 acres of tree clearing required for the NGL Pipeline. With the measures outlined in EA Section 3.5.3, FRA determined that construction of the Project is “not likely to adversely affect” the Indiana bat or northern long-eared bat. FRA also determined the Project would have “no effect” on other federally listed species. The USFWS Ohio Field Office concurred with this finding in a letter dated March 13, 2020.	T&E-01: Tree clearing will be conducted by LRET between October 1st and March 31st. There will be no tree clearing between April 1 and September 30.

Environmental Resource	Environmental Consequences	Mitigation Measures
	The FRA also determined there would be "no effect" on federally listed species at the origination of the NGL Pipeline at the Blue Racer facility and the associated HDD in West Virginia. The USFWS West Virginia field office concurred with this finding in writing on January 14, 2020.	T&E-02: If any tree clearing will be required outside of the time period in T&E-01, a presence/absence survey may be required. LRET will inform FRA, and further coordination will be conducted with USFWS Ohio Field Office and ODNR.
	The Ohio River and Opossum Creek crossings would be accomplished via HDD and conventional bore, respectively; therefore, LRET does not anticipate any impacts to state-listed aquatic species at these crossings. The proposed conventional bore crossing of Opossum Creek and avoidance of stream impacts would address the ODNR recommendation for a freshwater mussel survey at this crossing. The ODNR does not anticipate any impacts to the eastern hellbender from the proposed Project due to the proposed Project location and lack of suitable potential habitat.	T&E-03: To avoid impacts to state-listed aquatic species, LRET will conduct in-stream work within perennial streams outside of the ODNR recommended TOYR (April 15 – June 30). There will be no in-stream work within perennial streams between April 15 and June 30.
		T&E-04: To minimize potential stream and associated species impacts, LRET will construct the pipeline at the two largest water body crossings (Ohio River and Opossum Creek) via HDD and conventional bore, respectively.
Historic Properties (3.6)	The FRA determined the construction and installation associated with the Transloading Facility would have No Effect on historic properties. The Ohio Historic Preservation Office (OHPO) concurred with this finding.	None identified.
	The West Virginia Division of Culture and History (WVDCH) commented on the Project on January 9, 2020, concurring with FRA's determination that no archaeological investigations were necessary and that there would be No Effect to historic properties.	

Environmental Resource	Environmental Consequences	Mitigation Measures
	FRA completed survey work of the Area of Potential Effects (APE) for the NGL Pipeline component for both archaeology and built environment. Archaeological survey work identified one historic archaeological resource that FRA determined was ineligible for listing in the National Register of Historic Places (NRHP). The built environment survey work identified five potentially-eligible resources; two of these resources were determined eligible for the NRHP, the Lucas Farmstead and the Rufener Farmstead. FRA determined that the impacts to these properties from the Project would not diminish the historic integrity of the properties. Therefore, FRA determined the Project would have No Adverse Effect on historic properties. The OHPO concurred with this finding.	
	FRA sent consultation packages to the following federally-recognized tribes: Eastern Shawnee Tribe of Oklahoma, Miami Tribe of Oklahoma, Osage Nation, and Seneca Cayuga Nation. The Miami Tribe of Oklahoma responded stating that Monroe County was not in their area of concern. No other responses from tribes were received. Additional details of tribal consultation are discussed in Section 8.1 of this FONSI below.	

Environmental Resource	Environmental Consequences	Mitigation Measures
Contaminated Sites and Hazardous Waste (3.7)	With the current groundwater restrictions, cover systems, interceptor wells, in addition to operational Ranney wells, the contamination found to the east and southeast (downgradient) of the Transloading Facility is not expected to enter the proposed Transloading Facility. However, based on historical use of the LRET Property there is a slight potential that contaminated soils could be encountered during earthwork activities and site grading. Groundwater is not anticipated to be directly encountered during earthwork or grading. If contaminated soils were encountered and exposed to precipitation, contaminants could filter into the groundwater.	HAZ-01: LRET will prepare a Soil Management Plan to address encountering contaminated soils. This plan will include soil screening requirements, the oversight or monitoring of soil moving activities by an environmental professional, and contingency plans for the handling, removing, temporarily storing, characterizing, and disposing of contaminated materials. This plan will also include measures for containing, treating, and disposing of stormwater that may contact exposed soils.
	Contamination from down gradient sites would likely not be encountered during construction of the NGL Pipeline. However, based on the historical and current industrial use of the Blue Race facility and the LRET Property, and the overlap of the NGL Pipeline where it connects with existing facilities, there is a slight potential that contaminated soils could be found during earthwork activities, site grading, and installation of the HDD bore.	HAZ-02: LRET will prepare a Groundwater Management Plan to address the unlikely event of encountering contaminated groundwater from known down gradient sites. This plan will include the oversight of soil moving activities by an environmental professional, groundwater screening procedures, handling, temporary storage, characterization, and disposal of contaminated groundwater. This plan will also include contingencies for collecting, stabilizing, and disposal of drilling mud that may be exposed to contaminated groundwater.
Air Quality and Greenhouse Gas Emissions (3.8)	The Transloading Facility will have potential NO_x, CO, and VOC emissions that exceed the minor source air permitting thresholds and, therefore, would require a permit to construct and a permit to operate in accordance with the Ohio Administrative Code (OAC) chapter 3745-31.	AQ-01: LRET will use best available techniques (BAT) emission controls, including the flare and thermal combustor to control organic vapor emissions during railcar loading. LRET will also comply with requirements in applicable New Source Performance Standards (NSPS) and the conditions contained in the Ohio EPA Air Permit to construct and operate the Project.

Environmental Resource	Environmental Consequences	Mitigation Measures
	The GHGs produced by the Project are CO_2, CH_4, and N_2O during operation; hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride will not be emitted by the Project.	AQ-02: LRET will limit full-capacity flare operation during railcar loading conditions (with pilot operation occurring otherwise) and minimize idling emissions from locomotives.
	The Project will result in air pollutant emissions during short-term construction activities of the Transloading Facility. Emissions associated with construction activities generally include fugitive dust from soil disruption and combustion emissions from construction equipment.	AQ-03: LRET will use dust suppression techniques in sensitive areas to mitigate fugitive particulate matter from construction activities.
	The Project will result in air pollutant emissions during short-term construction activities of the NGL Pipeline.	
	Because the NGL Pipeline includes no fuel combustion or chemical processes, it is not expected to result in operational emissions.	

Environmental Resource	Environmental Consequences	Mitigation Measures
Noise and Vibration (3.9)	Table 3.9.2 of the EA summarizes the predicted noise levels for each construction phase of the Transloading Facility. Construction sound levels do not exceed the Federal Transit Administration (FTA) construction impact guidelines at any of the monitoring locations. Based on FTA guidelines, the noise levels resulting from the operation of the proposed Transloading Facility would be considered as "no impact" and mitigation is not required.	N&V-01: LRET will implement construction management procedures, which are best management practices, for both the Transloading Facility and the NGL Pipeline and include the following noise mitigation measures to minimize noise impacts: • Maintain all construction tools and equipment in good operating order according to manufacturers' specifications; • Limit use of major excavating and earth moving machinery to daytime hours; • To the extent practicable, schedule construction activity during normal working hours on weekdays when higher sound levels are typically present; • Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks; • For construction devices that use internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible; • Limit possible evening shift work to low noise activities such as welding, wire pulling and other similar activities, together with appropriate material handling equipment; • Use a Complaint Resolution Procedure to address any noise complaints received from residents; and • Communicate with neighbors prior to conducting specific loud noise activities such as steam blows.

Environmental Resource	Environmental Consequences	Mitigation Measures
	Based on the calculated vibration levels for the Transloading Facility, damage to structures could occur within 25 feet from the source and human annoyance could occur within 50 feet from the source. There are no sensitive receptors located 50 feet or less from the earth moving equipment. Therefore, vibration impacts due to construction are unlikely to occur. Transloading Facility operational vibration levels will be below the 80 VdB nighttime standards at the nearest residences.	
	There are residences within the vicinity of the NGL Pipeline limits of disturbance (LOD), with the closest residence being 200 feet from the NGL Pipeline LOD. Given the proximity of these residences to the NGL Pipeline LOD, there will be noise impacts associated with construction of the NGL Pipeline. There will be no noise impacts associated with the operation of the NGL Pipeline.	N&V-02: Specific to the NGL Pipeline near residences, LRET will work with the property owners on noise reduction measures. The majority of NGL Pipeline construction will occur during regular daylight hours. If any night time work is required, LRET will notify residents.
	Based on FTA guidelines, there will be no vibration impacts beyond 25 ft during typical construction activities within the NGL Pipeline LOD, and no vibration impacts beyond 100 ft during HDD drilling unless there is rock blasting. There are no sensitive receptors located within these distances and there is currently no rock blasting anticipated during the project. There will be no vibration impacts associated with the operation of the NGL Pipeline.	
Land Use, Planning, and Property Acquisitions (3.10)	The property where the proposed Transloading Facility will be constructed is owned by the parent company of LRET and no property acquisition would be required for building the Transloading Facility.	

Environmental Resource	Environmental Consequences	Mitigation Measures
	No change in land use is expected to occur under development of the NGL Pipeline. Approximately 21 acres of wooded area will be cleared for construction of the NGL Pipeline between the Ohio River and Transloading Facility. No trees would be permitted to grow over the NGL Pipeline ROW. No property is expected to be purchased for development of the NGL Pipeline. Lease or easement agreements would be negotiated with each of the individual property owners.	LAND-01: After construction, LRET will restore the LOD for the NGL Pipeline to as near as previous condition as possible, with the exception of former wooded areas which will be permanently converted to meadow.
	While there will be temporary impacts to property owners, the NGL Pipeline will not result in a long term impacts to property uses along the LOD. Property owners will have restive use of the ROW as negotiated in the lease or easement agreement.	TRSP-01: A road use maintenance agreement (RUMA) will be put in place by LRET with Monroe County and the Township prior to use of the road or pipeline construction. This agreement will include an evaluation of the current condition and a requirement to return the road to the previous condition (condition prior to the construction activities) or better condition. The RUMA will also describe any travel restrictions that would occur during construction. LRET will implement travel restrictions for pipeline construction personnel and related equipment deliveries or oversized loads during school bus travel times, if applicable. In the event of an emergency, response vehicles will be given the priority. The RUMA will detail contingencies, notification procedures, and emergency procedures related to transportation and traffic. LRET will work with Monroe County and the school district to get the information on bus routes and schedules prior to each school year during the construction period. Once the school bus routes and schedules are determined, LRET will coordinate with the school system prior to construction to be able to work around those schedules, if needed. This information will be detailed in the RUMA.

Environmental Resource	Environmental Consequences	Mitigation Measures
Parks, Recreation Areas, and Section 4(f) (3.11)	The Transloading Facility will be constructed on a portion of the former industrial facility within LRET Property, which is privately owned and operated. There are no parks, designated recreation areas or Section 4(f) resources within 1-mile of the proposed facility; therefore, no impacts to parks, recreation areas, or Section 4(f) resources will occur.	PARK-01: In accordance with the WV 401 WQC permit and WV 47CSR2, LRET will equip the NGL Pipeline with an emergency shut-off that will be located on both sides of the Ohio River. If there is a detected drop in pressure during pipeline use, such as would result from a leak from the pipeline, a valve will be automatically engaged to shut down the pipeline and to minimize any potential impacts to the environment. Emergency response procedures will also be put in place by LRET to evacuate any residual materials from that segment of the pipeline to keep them from entering the environment.
	The NGL Pipeline will not impact any public parks or resources and will not adversely affect any historic properties that are protected under Section 4(f).	PARK-02: LRET will provide newspaper notices prior to construction of the NGL Pipeline to notify users of the CONSOL Energy Powhatan Wildlife Agreement Area about the planned project and restricted access during construction. LRET will provide personnel to monitor the LOD during construction to keep the public off the LOD for their protection.
	The installation and operation of the NGL Pipeline would likely not impede public access or use of the Ohio River; although, during the drilling of the HDD bore, drilling mud could be lost in fractures. Drilling mud lost to fractures could migrate upward into the Ohio River affecting the river water quality and potentially affecting recreational use of the river for a period of time. During operation of the NGL Pipeline, there would be the potential for a leak to occur from the pipeline, which could migrate upward and impact the quality of the water in the Ohio River. A significant release could have an adverse effect on the water quality restricting access to, and use of, the Ohio River for recreational purposes.	GEO-03: In accordance with permit for WV 401 WQC, LRET will develop an Inadvertent Return Contingency Plan (IRCP), with contingencies for loss of drilling mud in bedrock fractures. The plan will include monitoring procedures to be implemented during drilling and action plans in the event of inadvertent returns.

Environmental Resource	Environmental Consequences	Mitigation Measures
	During construction of the NGL Pipeline, the portion of the LOD that traverses the CONSOL Energy Powhatan Point Wildlife Agreement Area would be inaccessible to the public; construction of the NGL Pipeline would restrict access to approximately 2.4 acres of the approximately 2,000-acre area. Hunting activities may be temporarily impacted depending on the when the pipeline is constructed and what hunting seasons are within that time period.	PARK-03: An easement or other arrangement will be obtained by LRET from CONSOL Energy to grant access for construction and the permanent ROW for the NGL Pipeline.
Public Health, Elderly and Persons with Disabilities (3.12)	Access to the proposed Transloading Facility would be from the existing access road for the LRET Property, and there would be no significant changes to traffic patterns that would impact the public, elderly, or persons with disabilities.	PH-01: LRET will restrict access to the new access road created for the NGL Pipeline interconnect valve, as indicated with signage near the road entrance.
	The construction of the NGL Pipeline would mostly occur in lightly populated areas and would not affect the elderly or disabled persons.	PH-02: LRET, in cooperation with Monroe County and the Township, will develop a resident coordination and communication plan for project road use that instructs LRET's contractor on procedures and required notifications when hauling oversized loads that may result in restricting public access to roads on a temporary basis during construction. LRET will notify the local residents of the potential road access restriction and oversized loads' will be coordinated during construction.

Environmental Resource	Environmental Consequences	Mitigation Measures
		PH-03: Emergency response procedures will be developed by LRET for operation of the pipeline, as mentioned in Section 3.11.3 of the EA. In the event of a release of NGL to the environment, LRET will implement a specific notification program, including notifications to the appropriate emergency response agencies, potentially impacted residents, and regulatory agencies.
		GHYD-02: LRET will prepare a spill prevention control and countermeasure (SPCC) plan in accordance with 40 CFR 112, Subpart A. This plan will cover all petroleum products that will be stored on the facility and include plans for emergency response in the event of a release.
		PARK-01: In accordance with the WV 401 WQC permit and WV 47CSR2, LRET will equip the NGL Pipeline with an emergency shut-off that will be located on both sides of the Ohio River. If there is a detected drop in pressure during pipeline use, such as would result from a leak from the pipeline, a valve will be automatically engaged to shut down the pipeline and to minimize any potential impacts to the environment. Emergency response procedures will also be put in place by LRET to evacuate any residual materials from that segment of the pipeline to keep them from entering the environment.

Environmental Resource	Environmental Consequences	Mitigation Measures
		TRSP-01: A road use maintenance agreement (RUMA) will be put in place by LRET with Monroe County and the Township prior to use of the road or pipeline construction. This agreement will include an evaluation of the current condition and a requirement to return the road to the previous condition (condition prior to the construction activities) or better condition. The RUMA will also describe any travel restrictions that would occur during construction. LRET will implement travel restrictions for pipeline construction personnel and related equipment deliveries or oversized loads during school bus travel times, if applicable. In the event of an emergency, response vehicles will be given the priority. The RUMA will detail contingencies, notification procedures, and emergency procedures related to transportation and traffic. LRET will work with Monroe County and the school district to get the information on bus routes and schedules prior to each school year during the construction period. Once the school bus routes and schedules are determined, LRET will coordinate with the school system prior to construction to be able to work around those schedules, if needed. This information will be detailed in the RUMA.

Environmental Resource	Environmental Consequences	Mitigation Measures
Safety and Security (3.13)	During construction and operation of the proposed Transloading Facility, there are no anticipated impacts to safety and security as the Transloading Facility would be constructed on private property.	S&S-01: LRET will control and limit access to the Transloading Facility to a single entrance with signage that makes it clear public access is not permitted. Signage would be posted at the entrance, warning of hazardous conditions and that only authorized personnel will be allowed on the site. Signage indicating "No trespassing" will be posted where appropriate.
	During construction of the NGL Pipeline, coordination would occur with local security and emergency response personnel, as the LOD for the NGL Pipeline would be restricted from public access during the construction activities. Access to the NGL Pipeline would be restricted to individual property owners, as the ROW is located on private property. Portions of the property that are open for public hunting and use would be returned to normal access once the NGL Pipeline is completed.	S&S-02: LRET will provide security personnel to monitor the NGL Pipeline LOD during construction to keep the public off the LOD and safe from the construction activities. Marking of the pipeline will be in accordance with ORC 4901:1-16, 49 C.F.R. 40, 49 C.F.R. 191, 49 C.F.R. 192 and 49 C.F.R. 199. As stated in 49 C.F.R. 192, the marker warning must consist of the following written legibly on the background of a sharply contrasting color on each line marker: the word "Warning", "Caution", or "Danger", followed by the words "Gas (or name of gas transported) Pipeline", all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke. The name of the operator and telephone number where the operator can be reached at all times should also be present.

Environmental Resource	Environmental Consequences	Mitigation Measures
Environmental Justice (3.14)	Based on the demographic profile of Monroe County, Ohio and the Marshall County, West Virginia, neither the Transloading Facility nor the NGL Pipeline would present a disproportionate impact on minority or low-income populations because of the limited populations present within these areas and because the Project will not cause adverse impacts to resources related to environmental justice.	None identified.
Socioeconomic Resources (3.15)	The proposed Transloading Facility would be constructed on the LRET property. The Proposed Action would bring an economic benefit to the region. Jobs would be created by providing additional capacity for moving NGL from the region, and also during construction and operation of the facility. The NGL Pipeline would not impact the population of Monroe County, Ohio and Marshall County, West Virginia. During construction of the NGL Pipeline, construction jobs would be available including labor, equipment operators, pipefitters, welders, environmental inspectors, construction management, truck driving, and drilling operators. The project would be a beneficial impact on socioeconomic resources.	None identified.
Energy Use (3.16)	Under the Proposed Action Alternative, the temporary draw on the local power supply would be increased but would not result in an interruption of service or undue stress on the existing electrical infrastructure. No impacts are anticipated stemming from the construction and operation of the proposed Transloading Facility.	None identified.

Environmental Resource	Environmental Consequences	Mitigation Measures
	During construction of the proposed NGL Pipeline, electrical needs would be supplied through portable generators as needed for lighting, running pumps, welding, tools, etc. The electrical power needed to construct and install the remainder of the NGL Pipeline in Monroe County, Ohio, would be provided by portable power generation units that would not draw on the existing electrical grid.	
Aesthetics and Visual Quality (3.17)	The visual effects of the Transloading Facility would be minimal.	None identified.
	The NGL Pipeline would traverse rural areas, mostly farm fields and wooded areas. The NGL Pipeline would be buried, so once the NGL Pipeline is installed, there would be no significant changes to the viewshed except where trees would be removed for construction and continued maintenance of the pipeline.	None identified.

Environmental Resource	Environmental Consequences	Mitigation Measures
Transportation Resources (3.18)	During the operation of the proposed Transload Facility, vehicular traffic would see a minor increase from the addition of eight new full-time employees and occasional delivery trucks that would enter the Transloading Facility for collecting transmix NGL. Rail traffic to the proposed Transloading facility would increase and the facility is expected to fill 40-rail cars at a time. Based on the minimal increase of traffic during construction and the rail storage capacity at the LRET Property, the Transloading Facility would not have impacts on transportation resources.	TRSP-01: A road use maintenance agreement (RUMA) will be put in place by LRET with Monroe County and the Township prior to use of the road or pipeline construction. This agreement will include an evaluation of the current condition and a requirement to return the road to the previous condition (condition prior to the construction activities) or better condition. The RUMA will also describe any travel restrictions that would occur during construction. LRET will implement travel restrictions for pipeline construction personnel and related equipment deliveries or oversized loads during school bus travel times, if applicable. In the event of an emergency, response vehicles will be given the priority. The RUMA will detail contingencies, notification procedures, and emergency procedures related to transportation and traffic. LRET will work with Monroe County and the school district to get the information on bus routes and schedules prior to each school year during the construction period. Once the school bus routes and schedules are determined, LRET will coordinate with the school system prior to construction to be able to work around those schedules, if needed. This information will be detailed in the RUMA.
	As discussed in Section 3.12 and 3.13 of the EA, during the construction and installation of the pipeline, local roads would be used to access the pipeline route and work areas associated with the pipeline. Once the NGL Pipeline has been installed and the area has been restored, there would be no additional traffic for the NGL Pipeline.	PH-01: LRET will restrict access to the new access road created for the NGL Pipeline interconnect valve, as indicated with signage near the road entrance.

Environmental Resource	Environmental Consequences	Mitigation Measures
		PH-02: LRET, in cooperation with Monroe County and the Township, will develop a resident coordination and communication plan for project road use that instructs LRET's contractor on procedures and required notifications when hauling oversized loads that may result in restricting public access to roads on a temporary basis during construction. LRET will notify the local residents of the potential road access restriction and oversized loads' will be coordinated during construction.
Indirect and Cumulative Impacts (3.19)	The planned capacity for the Transloading Facility would be sufficient for the reasonably foreseeable future. The usage of existing capacity and expanded services of the Transloading Facility could result in additional jobs to individuals in Monroe County through temporary construction jobs and additional operational jobs relating to the production and shipping of other petroleum products in the region. While such development is possible, there are no known plans for it and as such any discussion of potential impacts would be speculative.	None identified.
	Except for adverse effects from an unexpected leak or release from the pipeline, which are considered and addressed in Section 3.12 and 3.12 of the EA, there would be no anticipated indirect impacts to human health or individuals as a result of the NGL Pipeline.	

7. MITIGATION MEASURES

Monroe County and LRET are required to comply with all applicable federal, state, and local permitting requirements during the implementation of the Selected Alternative, which include:

- Federally Funded Transloading Facility
  - Local Fire Jurisdiction/Ohio Department of Commerce
  - Ohio Building Code, Department of Commerce
  - Ohio Environmental Protection Agency (EPA) Air Permit
  - Ohio EPA Construction Stormwater Permit
  - Ohio EPA Hydrostatic Test Discharge National Pollutant Discharge Elimination System (NPDES)
  - Ohio EPA NPDES Permit
- Non-Federally Funded NGL Pipeline
  - USACE Nationwide Permit (NWP)-12
  - USACE Section 10 Authorization
  - Ohio EPA Hydrostatic Test Discharge NPDES
  - Ohio Linear Pipeline Construction Stormwater
  - Ohio EPA 401 WQC
  - West Virginia (WV) 401 WQC
  - West Virginia Construction Stormwater
  - West Virginia Hydrostatic Test Discharge NPDES

The mitigation measures shown in Table 1 have been identified to address and further reduce impacts of the Project. As the grantee, Monroe County is ultimately responsible for ensuring all environmental commitments identified in this FONSI are implemented, including those mitigation measures identified in Table 1 that will be directly implemented by LRET.

8. COORDINATION AND CONSULTATION

This section describes coordination and consultation efforts that occurred during the evaluation of the Project. Coordination and consultation efforts focused on potential impacts to the environment and to meet requirements for associated permits required for the Project.

8.1. Stakeholder Involvement

The proposed Transloading Facility and a portion of the proposed NGL Pipeline is on property owned by LRET. The remainder of the NGL Pipeline will cross an additional 29 land parcels and an additional 14 property owners. Individual meetings with property owners along the proposed pipeline route were notified about the Project and the need for the NGL Pipeline across their respective properties. Access agreements were signed with the impacted property owners in order to conduct field studies along the route. The property owners allowed access for the studies which were presented in the EA. No property owner along the pipeline route has expressed concerns with the Project or the proposed NGL Pipeline. LRET will continue to coordinate with property owners for the NGL Pipeline.

In addition to the individual property owners, FRA conducted Section 106 consultation with four federally-recognized Tribes. These Tribes included:

- Eastern Shawnee Tribe of Oklahoma
- Miami Tribe of Oklahoma
- Osage Nation
- Seneca-Cayuga Nation

FRA invited these Tribes to participate in the Project as a consulting party in the Section 106 process. Section 106 consultation packages, including the cultural resource report, were sent in hardcopy to each Tribe on March 16, 2020. No responses were received to this initial consultation. FRA emailed all four Tribes regarding the Project on April 16, 2020. The Miami Tribe of Oklahoma responded via email on April 16, 2020 and indicated that Monroe County was outside of their area of concern.

FRA then sent a follow up letter to the three Tribes that had not yet responded on July 10, 2020. This follow up letter detailed the Section 106 process and the open 30-day public comment period for the EA. This letter contained the original March 16, 2020 consultation package. The follow up letter was sent to all three Tribes in hardcopy and via email. No responses were received by FRA from this follow up letter.

8.2. Public Involvement and Participation

No public meetings or hearings were held for the Project. Public meeting and newspaper notices will be conducted for the Ohio EPA Air Permit, as described in Section 1.5 of the EA, that will be submitted for the Transloading Facility. These meetings and notifications will be conducted in accordance with the requirements of the Ohio EPA.

The FRA publicly released an EA for a 30-day public comment period, which began on July 10, 2020 and ended on August 10, 2020. A notice was placed in the Intelligencer (Wheeling News-

Register) on July 10, 2020 and the Monroe County Herald on July 16, 2020. The notices presented a summary of the project and provided access information to Project web site (https://www.longridgeenergy.com/businesses/natural-gas-liquids-infrastructure) and the government docket web site (https://www.regulations.gov/docket?D=FRA-2020-0049) where a copy of the EA was available for review and comment.

During the comment period, two comments were received. The comments are included in Appendix A in their entirety. FRA's responses to comments received are detailed below:

- One comment by an individual in support of the Selected Alternative was received on August 6, 2020.
    - Comment noted.
- One comment by the organization FreshWater Accountability Project was received on August 10, 2020. This commenter had concerns on aspects of the EA, including the purpose and need, market conditions, and EA assumptions, and requested additional time for public review.
    - The commenter points to a current depression in the NGL market due to the fluctuations in pricing and demand from market shifts of the COVID-19 and subsequent fiscal emergencies. The commenter's concerns about the purpose and need for this project focus on the current market conditions; however, once the public health emergency related to COVID-19 is controlled and the economy recovers, development of the resources in this area is expected to continue.[1] FRA's analysis assumes a non-emergency situation in its impacts and assumes that the current situation is a deviation rather than a continued state. In addition, the commenter refers to a proposed ethane cracker and thane storage facility (Mountaineer), but the Appalachian NGL Hub Rail Transloading facility and pipeline is not planned for the ethane market and would not be tied to the cracker (plastic) industry. The local cracking plant may be on hold, but the Shell Cracker in Beaver County, Pennsylvania is still under construction. The products planned for the NGL Transloading Facility include propane, butane, and natural gasoline. Moreover, propane prices have shown a steady increase since April 2020 and the drop in propane prices appears to be more related to annual cycles and not the pandemic.[2] The propane production from the Midwest has not changed appreciably since September 2018. The US Energy Information Administration predicts a decline in hydrocarbon gas liquids (HGLs) in 2020, but a recovery and increase in 2021.[3] FRA's NEPA process analyzes the environmental impacts of the project and does not issue permits or other authorizations. The FRA provided 30 days for public review, in accordance with 23 Code of Federal Regulations 771 and FRA does not believe additional public review is needed.

[1] US Department of Energy (DOE) Primer published June 27, 2018, projects that Appalachian NGL products will increase over 700 percent from 2013 to 2023 (US DOE 2018).
[2] https://www.eia.gov/petroleum/weekly/propane.php
[3] https://www.eia.gov/outlooks/steo/report/us_oil.php

8.3. Agency Coordination

In their role in implementing the Selected Alternative, LRET will obtain Federal and State permits, as required, prior to development of the Transloading Facility and NGL Pipeline. As the grantee, Monroe County will ensure receipt of the applicable permits and compliance with all permit conditions. During the EA process, LRET coordinated on the preparation of the required permits, particularly for the NGL Pipeline, as described in Section 1.5 and 4.0 of the EA. A summary of the agencies that have been contacted during the permitting and EA process are listed below and will continue to be engaged through the permitting process.

- United States Army Corps of Engineers: Individual/Nationwide Permitting, Section 10 Permit
- United States Fish and Wildlife Service, Ohio and West Virginia Offices: Endangered Species Act compliance.
- Ohio Department of Natural Resources: Required for Ohio EPA 401 Water Quality Certification permit.
- Ohio Environmental Protection Agency: 401 Water Quality Certification (WQC) for the NGL Pipeline and Transloading Facility air permit.
- West Virginia Department of Environmental Protection: 401 Water Quality Certification (WQC) for the crossing of the Ohio River.
- Ohio Historic Preservation Office: Section 106 consultation.
- West Virginia Division of Culture and History: Section 106 consultation.

9. CONCLUSION

FRA finds that the Appalachian NGL Hub Rail Transloading Facility as presented and assessed in the EA satisfies the requirements of NEPA (42 U.S.C. §§ 4321 *et seq.*), and Council on Environmental Quality (CEQ) regulations (40 CFR parts 1500-1508), 23 CFR parts 771 and 774, and the Selected Alternative will have no foreseeable significant impact on the quality of the human or natural environment). The EA provides sufficient evidence and analysis for FRA to determine that an environmental impact statement is not required for the Appalachian NGL Hub Rail Transloading Facility as presented.

JAMIE P. RENNERT

Digitally signed by JAMIE P. RENNERT
Date: 2020.08.28 13:45:08 -04'00'

Jamie P. Rennert Date
Director, Office of Infrastructure Investment
Federal Railroad Administration

FRA's Office of Railroad Policy and Development prepared this document in August 2020 . For further information regarding this FONSI contact:

Amanda Ciampolillo
Environmental Protection Specialist
U.S. Department of Transportation
Federal Railroad Administration
Office of Railroad Policy and Development
Environment and Project Engineering Division
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone (617) 494 - 2173

Appendix A: Comments on the EA

Public comments for the EA were collected using Regulations.gov. The EA was Docket ID: FRA-2020-0049. During the public comment period for the EA, two comments were received. FRA's responses to these comments are shown in Section 8.2 of the FONSI.

Comment 1
Tracking Number: kdi-wo78-1n5p
Comments Received: August 6, 2020
Submitter Name: Taylor Abbott

Comment Submitted:
Monroe County and the Ohio Valley region stand to gain significant economic and workforce benefits as a result of this project. Historically, Monroe County has consecutively had the highest unemployment rate of any county in the state of Ohio. The approval and completion of the Appalachian NGL Hub Rail Transloading Facility has the potential to be a catalyst for future industrial and commercial development that is frankly needed in southeast Ohio, particularly here in the Ohio Valley. It is my express hope that this project comes to fruition.

Comment 2
Tracking Number: 1k4-9iap-jo4k
Comments Received: August 10, 2020
Submitter Name: John Heer

Comment Submitted:
On behalf of FreshWater Accountability Project, I am respectfully submitting comments regarding the Appalachian NGL Hub Rail Transloading Facility Draft Environmental Assessment ("NGL Transloading EA"). Freshwater Accountability Project is a nonprofit organization with a mission to preserve freshwater supplies, is dedicated to promoting health by protecting the environment in Ohio, and has members located throughout the state of Ohio, including members along the Ohio River who will be directly affected by the proposed Appalachian NGL Hub Rail Transloading Facility ("NGL Transloading Facility").

Fundamental Assumptions Underlying The Environmental Assessment Are Flawed And Should Be Reevaluated.

The NGL Transloading EA is flawed because it is based upon assumptions which can be proven to be inaccurate. For example, the NGL Transloading EA begins in the very first sentence with the statement that the NGL Transloading Facility will be constructed "to support the continued need for transportation of Natural Gas Liquids (NGL) to end-use markets." NGL Transloading EA, Section 1.1 Introduction at page 1-1. However, there is ample evidence that the assumption of a "continued need for transportation of [NGL] to end-use markets" is misplaced or just plain wrong.

The petrochemical industry is undergoing a massive shift in both public perception and public need. The pandemic has taught us that some of our common practices and thinking must change, and that our

common assumptions must be reevaluated. This includes the incorrect assumption that NGL transportation will continue to be needed in this area. The Institute for Energy Economics and Financial Analysis (IEEFA) has stated that the petrochemical industry faces significant challenges. IEEFA's report, "Proposed PTTGC Petrochemical Complex in Ohio Faces Significant Risks" (March 2020), questions whether projects like the NGL Transloading Facility will provide the anticipated jobs, tax revenues and other spinoff benefits to the State and the people of southeastern Ohio, as proponents claim. "The risks are becoming insurmountable. The price of plastics is sinking and the market is already oversupplied due to industry overbuilding and increased competition," said Tom Sanzillo, IEEFA's director of finance and author of the report.

The report identifies principal risks as:

Plastics prices today are 40% below the 2010-2013 period when the project was originally proposed. Weak prices will drive profit margins below investment targets.
Oversupply from a global industry-wide plastics buildout is likely to drive prices and revenues down. Supply/demand imbalances are likely to last through 2026.
Stiff competition from major companies - ExxonMobil, Dow Chemical, Chevron that have existing relationships in the U.S. market.
Slower U.S. (and global) economic growth projections by the International Monetary Fund suggest a slowdown that will impact both volume and prices.
Uncertainty over federal government policies add to the risk factors.

Moreover, the Mountaineer NGL storage project lost its environmental permit in March 2020. Powhatan Salt Company and the sponsors of the Mountaineer Storage Project allowed a state environmental permit to expire in March 2020. Why? Because construction of the project's most promising potential customer, the PTT Global Chemical (PTTGC) Petrochemical Complex, has been delayed due to the weakened state of cracker plant and plastic markets.

2020 will not be a year when the company's margins improve, as plastics prices have started the year low and the Chinese market, a major buyer of PTTGC's products, is showing signs of a slow year. Starting a new expansion now would be a risk to the company's credit rating. The market outlook is much weaker than when the projects were originally planned. The profit margins for cracker and plastics plants have declined over the past five years. It remains to be seen if PTTGC's prior expressions of interest in using the storage facility still hold.

Obtaining the permit was essential for Mountaineer's sponsors and important for reassuring an investor like Goldman Sachs that they could maintain confidence in the project. Poor market conditions and more time needed to get the project moving forward means it has become more risky, and that means more expensive. The situation at Mountaineer demonstrates that the granting of an environmental permit does not change the fundamental market dynamics of a project. From the very first sentence of the NGL Transloading EA to the cumulative impact analysis, the assumptions underlying the NGL Transloading EA are simply flawed and should be reevaluated.

We request that more time and information be provided regarding the NGL Transloading Facility, and the Federal Railroad Administration should provide a public hearing, extend the public comment period, and prepare a full Environmental Impact Statement under NEPA.