

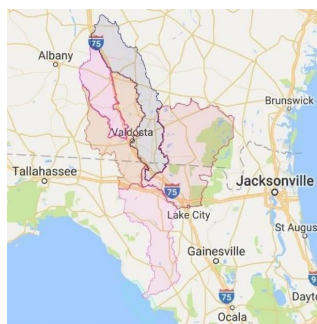
August 11, 2017



WWALS Watershed Coalition, Inc



the WATERKEEPER® Alliance  
Member for the Suwannee,  
Withlacoochee and Alapaha Rivers



- Upper Suwannee River HUC 03110201
- Withlacoochee River HUC 03110203
- Alapaha River HUC 03110202
- Little River HUC 03110204
- Lower Suwannee River HUC 03110205
- Suwannee River Estuary

Occupational Safety and Health Administration (OSHA)  
ATTN: Duty Officer, **Jacksonville Area Office**  
Ribault Building, Suite 227, 1851 Executive Center Drive, Jacksonville, Florida 32207  
[jacksonville.osha@dol.gov](mailto:jacksonville.osha@dol.gov), (904) 232-2895, (904) 232-1294 FAX

Re: **Chronic Leaks at Sabal Trail Dunnellon Compressor Station Site, Marion County, Florida**  
FERC Docket No. CP15-17-000, FDEP Permit Number: 0328333-001  
USACE Application Number : SAJ-2013-03030 (FL)

Dear OSHA Duty Officer,

Despite copious and detailed objections from WWALS<sup>1</sup> and other intervenors and an outstanding lawsuit from Sierra Club, Flint Riverkeeper, and Chattahoochee Riverkeeper, the Federal Energy Regulatory Commission (FERC) on June 9, 2017 approved Sabal Trail going in service<sup>2</sup> and on July 11, 2017 Sabal Trail notified FERC it had commenced service through its 36-inch natural gas pipeline.<sup>3</sup> A week later, Sabal Trail sprung a hazardous odorant leak, took at least two days to fix it, and has already leaked again.

Marion County Fire Rescue documents unsafe methods by Sabal Trail contractors such as **“wrapped the area with towels and sprayed a deodorant but more than likely will continue to leak until line is fixed.”**<sup>4</sup> However, there is no record that anyone was wearing or using any protective gear, much less any protection for the public on or across a nearby highway.

Numerous people reported smelling natural gas while driving on Florida 200 past the site of the planned Dunnellon Compressor Station in Marion County, Florida, just north of the Withlacoochee (south) River, starting Sunday July 16, 2017. The specific 911 call to Marion County came from across that highway.<sup>5</sup> FERC and all the other agencies that permitted Sabal Trail assured everyone that that pipeline would be safe. Now the public is rightly alarmed that it is not safe, and there is no word from any of the permitting agencies as to what is going on.

Please see the nineteen questions<sup>6</sup> WWALS sent to the federal agencies (FERC, USACE, PHMSA) and state agency (FDEP), the very incomplete response from Sabal Trail,<sup>7</sup> the open records responses from Marion County Fire Rescue cited above, and responses from PHMSA and FDEP saying they were not notified<sup>8</sup> and no indication that they took any action.

I am aware that the Pipeline Safety Act delegates some aspects of pipeline safety to the Pipeline & Hazardous Materials Safety Administration (PHMSA), but apparently not for contractors:<sup>9</sup>

*“OSHA authority over working conditions associated with oil and gas pipelines generally is limited to employers (e.g., contractors hired by pipeline owners or operators) and their workers, who are not covered by OPS regulations.”*

OSHA even has with the American Pipeline Contractors Association an *“Alliance to protect safety, health*

<sup>1</sup> FERC Accession Number 20170605-5011, June 5, 2017, "Supplemental Information in support of motion by WWALS Watershed Coalition, Inc. to stay Sabal Trail In-Service request, to revoke the February 2, 2017 Order, plus to call for a Supplemental Environmental Impact Statement, under CP15-17, et. al.", [https://elibrary-backup.ferc.gov/idmws/file\\_list.asp?document\\_id=14577187](https://elibrary-backup.ferc.gov/idmws/file_list.asp?document_id=14577187)

<sup>2</sup> FERC Accession Number 20170609-3016, June 9, 2017, "Letter order granting Sabal Trail Transmission, LLC's 5/17/17, as supplemented on 5/26/17, request to commence service of certain Phase I Facilities for the Sabal Trail Project under CP15-17.", [https://elibrary-backup.ferc.gov/idmws/file\\_list.asp?document\\_id=14578791](https://elibrary-backup.ferc.gov/idmws/file_list.asp?document_id=14578791)

<sup>3</sup> FERC Accession Number 20170711-5235, July 11, 2017, "Sabal Trail Transmission, LLC submits its Notice of Commencement of Service and Acquisition of Lease Capacity under CP15-17.", [https://elibrary-backup.ferc.gov/idmws/file\\_list.asp?document\\_id=14586833](https://elibrary-backup.ferc.gov/idmws/file_list.asp?document_id=14586833)

<sup>4</sup> "Sabal Trail Pipeline Narrative 071617", Marion County Fire Rescue, July 16, 2017, <http://www.wwals.net/?p=35711#narrative>

<sup>5</sup> "Incident Detail Report," Incident Number 2017-047633, Marion County Fire Rescue, July 16, 2017, <http://www.wwals.net/?p=35711#timeline>

<sup>6</sup> "Questions from WWALS Watershed Coalition, Inc. about Leak at Sabal Trail Dunnellon Compressor Station Site under CP15-17," FERC Accession Number 20170727-5104, July 27, 2017, [https://elibrary.ferc.gov/idmws/file\\_list.asp?document\\_id=14590897](https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14590897)

<sup>7</sup> "Sabal Trail Transmission, LLC submits its Response to July 27 Letter of WWALS Watershed Coalition under CP15-17," FERC Accession Number 20170728-5135, July 28, 2017, [https://elibrary.ferc.gov/idmws/file\\_list.asp?accession\\_num=20170728-5135](https://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20170728-5135)

<sup>8</sup> "State and local responses to Dunnellon Sabal Trail stink," WWALS, July 31, 2017, <http://www.wwals.net/?p=35577>

<sup>9</sup> "Duty of utility companies or owners to respond under 29 CFR 1926.651(b)(2)", Russell B. Swanson, Director Directorate of Construction, OSHA, May 28, 2017, [https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=INTERPRETATIONS&p\\_id=24852](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=24852)

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.



*of workers in the pipeline industry.*"<sup>10</sup>

Further, this site is the junction of two pipelines and the planned site of a compressor station:<sup>11</sup>

*"OSHA has not concluded that all types of facilities commonly operated by pipeline companies are exempt from the process safety management (PSM) standard. In 2005, OSHA concluded that gas processing plants are appropriately covered by the standard. In addition, PHMSA at the time agreed that fire and explosion hazards at gas processing plants are generally not regulated by PHMSA and are therefore subject to OSHA PSM coverage."*

According to the Marion County Fire Rescue report, the substance leaked was "Methyl Herceptin" or Mercaptan, about which OSHA says:<sup>12</sup>

*"NIOSH Immediately Dangerous To Life or Health Concentration (IDLH): 150 ppm  
Potential Symptoms: Irritation of eyes, skin, respiratory tract; cough, sore throat; headache; nausea; shortness of breath; unconsciousness; pulmonary edema (delayed); CNS effects (narcosis, cyanosis, seizures); respiratory failure; frostbite (on contact with liquid)  
Health Effects: Odor (HE20); CNS effects (HE7); Irritation-Eye, Nose, Throat, Skin---Moderate (HE15); Respiratory effects---edema (HE11)  
Affected Organs: Respiratory system, CNS, eyes, skin, blood"*

Marion County Fire Rescue reported more than ten times the "Immediately Dangerous To Life or Health Concentration:" "Upon opening the panel, our GCI readings increased to 1800 ppm."

In addition to the first odorant gas leak which started on July 16, 2017 and continued for some days, Sabal Trail has leaked again on August 5 and 6, 2017.<sup>13</sup> A pipeline that has already leaked a hazardous chemical widely smelled on and across a nearby busy highway, within a week of declaring to its principal permitting agency that it was operational, and again only weeks later, is clearly at hazard of fire and explosion. This ongoing safety problem also calls into question the ability of Sabal Trail and its contractors to operate their facilities safely.

WWALS members in Marion and Citrus Counties have asked me to write you about this situation, especially since all the state and federal permitting agencies and PHMSA have done nothing about it. Sabal Trail did not notify them, and none of them notified any of the local emergency management departments that are left unassisted to deal with this chronic safety problem.

I look forward to your prompt response.

Sincerely,

John S. Quarterman, Suwannee Riverkeeper  
President, WWALS Watershed Coalition  
PO Box 88, Hahira, GA 31632  
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Cc: Kimberly D. Bose, Secretary, FERC

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Stacie Causey, Marion County Office of Public Information, [pio@marioncountyfl.org](mailto:pio@marioncountyfl.org), 352-438-2311  
James Bowlin, Emergency Management Director, Marion County Sheriff's Office, [jbowlin@marionso.com](mailto:jbowlin@marionso.com), 352-369-8185  
Tory Slattery, Fire Chief, City of Dunnellon, [tslattery@dunnellon.org](mailto:tslattery@dunnellon.org), (352)465-8595  
Dawn M. Bowne, City Clerk, City of Dunnellon, [dbowne@dunnellon.org](mailto:dbowne@dunnellon.org), (352) 465-8500 ext. 1002

<sup>10</sup> "OSHA and the American Pipeline Contractors Association renew Alliance to protect safety, health of workers in the pipeline industry", OSHA, January 30, 2012, <https://www.osha.gov/news/newsreleases/trade/01302012>

<sup>11</sup> "OSHA vs. PHMSA: The Tangled Web of Jurisdiction Over Midstream Operations", North American Oil & Gas Pipelines, July 20, 2015, <http://napipelines.com/osha-vs-phmsa-jurisdiction/>

<sup>12</sup> "Methyl Mercaptan," OSHA, unknown date, accessed August 10, 2017, [https://www.osha.gov/dts/chemicalsampling/data/CH\\_254300.html](https://www.osha.gov/dts/chemicalsampling/data/CH_254300.html)

<sup>13</sup> "Stooges Stink Again: Sabal Trail at Dunnellon Compressor Station," WWALS, August 11, 2017, <http://www.wwals.net/?p=35916>