



# Spire STL Pipeline Project

Resource Report 12  
PCB Contamination

FERC Docket No. CP17-\_\_\_-\_\_\_

FERC Application  
January 2017

Public



<b>RESOURCE REPORT 12 - PCB CONTAMINATION</b>	
<b>SUMMARY OF FILING INFORMATION</b>	
<b>Information</b>	<b>Found in</b>
1. For projects involving the replacement or abandonment of facilities determined to have polychlorinated biphenyls (PCBs), provide a statement that activities would comply with an approved U.S. Environmental Protection Agency disposal permit or with the requirements of the Toxic Substances Control Act - Title 18 Code of Federal Regulations (CFR) part (§) 380.12 (n)(1)	Not Applicable.
2. For compressor station modification on sites that have been determined to have soils contaminated with PCBs, describe the status of remediation efforts completed to date - 18 CFR § 380.12 (n)(2)	Not Applicable.



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## Acronyms and Abbreviations

CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
PCBs	polychlorinated biphenyls
ppm	parts per million
Project	Spire STL Pipeline Project
Spire	Spire STL Pipeline LLC
USEPA	United States Environmental Protection Agency



## PCB Contamination

As described in 18 Code of Federal Regulations (“CFR”) Part 380.12(n), this section is required for applications involving the replacement, abandonment by removal, or abandonment in place of pipeline facilities determined to have polychlorinated biphenyls (“PCBs”) in excess of 50 parts per million (“ppm”) in pipeline liquids.

The existing facilities along Spire STL Pipeline LLC’s (“Spire’s”) proposed Spire STL Pipeline Project (“Project”) consist of Laclede Gas Company’s Redman Station and Enable Mississippi River Transmission LLC’s Chain of Rocks, which are not listed on the United States Environmental Protection Agency’s (“USEPA’s”) Comprehensive Environmental Response, Compensation, and Liability Information System (“CERCLIS”) (USEPA 2015).

None of the proposed facilities within Spire’s proposed Project are expected to contain PCBs in excess of 50 ppm. A discussion of the existing facilities that are proposed to be removed/replaced is provided in Section 12.1 In addition, there are no existing or proposed compressor stations as part of the Project. Therefore, detailed information specific to Resource Report 12 is not provided herein.

### 12.1 Existing Line 880

As part of Spire’s proposed Project, Spire is proposing to replace certain facilities along the existing Line 880 pipeline in St. Louis County, Missouri. The original pipeline was installed and placed in service in 1961. The PCB containing products used in the natural gas industry prior to them being banned in 1979 by the United States Congress were Aroclors 1242 and 1248 (i.e., lubricants for gas compressors), and Aroclor 1254 (i.e., lubricants for air compressors), Aroclor 1260, and Aroclor 1268 (i.e., valve sealants and lubricants). The major sources of PCB contamination were introduced through the lubricating oil of centrifugal compressor units. Once in the pipeline, the PCBs would travel in the pipeline via the formation of liquids and not through the vapor stage (S. S. Papadopoulos & Associates, Inc. 2010).

Over its operating history, Line 880 has not been subject to large amounts of liquids, nor has a compressor station ever been directly connected to the pipeline. Source gas entering the existing Line 880 passes through a meter station that largely removes liquid prior to the gas entering the pipeline. In compliance with existing regulations, Spire has regularly tested for PCBs in the existing Line 880 during approximately the past 15 years. These tests did not identify PCBs at levels above 50 ppm. During construction, if liquid is found within the existing pipeline it will be tested for PCBs among other chemicals to ensure proper disposal of removed sections, including the existing pipe bridge to be removed.

Prior to putting Line 880 in service, Spire intends to clean the existing and new pipeline with a small amount of clean water and a cleaning pig device. Should PCBs be detected during construction, or if testing during construction is not completed due to a lack of liquid in the existing pipeline, Spire will test the wash water for PCBs following the pipe cleaning. If PCBs are present then the pipeline will continue to go through cleaning procedures until PCBs are no longer detected in the liquids. Spire and/or its contractor will be responsible for disposing of



liquids and other waste materials with PCBs at an appropriate hazardous waste facility in accordance with the USEPA's Toxic Substances Control Act regulations.

In the event that PCB-contaminated liquid, soil or facilities are encountered during construction, any removal of these materials will be done in accordance with the USEPA's Toxic Substance Control Act regulations found at 40 CFR 761, as well as any applicable state regulations. Additionally, Spire would implement its Plan for Unanticipated Discovery of Contaminants Plan (Resource Report 8, Appendix 8-E) and adhere to applicable federal, state, and local regulations. The plan will identify the steps to be followed in the event that contaminated sediments or soils are encountered during construction.

## 12.2 References

S. S. Papadopulos & Associates, Inc. 2010. *PCBs in the Interstate Natural Gas Transmission System - Status and Trends*. Accessed December 2016 from <http://www.ingaa.org/File.aspx?id=10753>.

United States Environmental Protection Agency. 2015. *CERCLIS Search*. Accessed December 2016 from <https://www.epa.gov/enviro/cerclis-search>.