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PIPE LINE AWARENESS NETWORK
FOR THE **NORTH EAST, INC.**
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November 14, 2019

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20216

**Re: Atlantic Bridge Project, Docket No. CP16-9,
Algonquin Gas Transmission, LLC and Maritimes & Northeast Pipeline, L.L.C.
Failure to Meet Certificate Condition re MCP**

Dear Secretary Bose:

We write to further correct the record, in opposition to the project proponents' request for a Notice to Proceed. Enbridge asserts that the "Release and Abatement Measure ('RAM') plan is not required for issuance of a notice to proceed, because it is not an authorization required under federal law." However, the company previously asserted on the record:

Algonquin's Licensed Site Professional will oversee soil and groundwater management activities at the Weymouth site during construction for **compliance with the applicable provisions of the Massachusetts Contingency Plan** (MCP; 310 CMR 40.0000) and related MassDEP policies and guidance.

See Algonquin's June 16, 2016 Response to Comments on the EA (at p. 14), Accession No. 20160616-5147 (emphasis added).

Moverover, the December 12, 2017 Order on Rehearing states in paragraph 67:

[W]e remind all parties that the certificate of public convenience and necessity is contingent upon Applicants' compliance with all applicable laws, **including those required pursuant to the applicable provisions of the Massachusetts Contingency Plan.**"

(Emphasis added.)

The RAM plan is an integral part of the Massachusetts Contingency Plan.¹ Thus, addressing soil remediation at the Weymouth compressor site, through compliance with the RAM plan, is a condition of the FERC Certificate.

For the forgoing reasons, please deny the project proponents' request for a Notice To Proceed.

Respectfully submitted,



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¹ See *Draft Release Abatement Measure Plan, Atlantic Bridge Project Weymouth Compressor Station*, September 11, 2019, at 4 (“TRC Environmental Corporation (TRC), on behalf of Algonquin Gas Transmission, LLC (Algonquin), has prepared this draft Release Abatement Measure (RAM) Plan to establish the measures Algonquin and its contractors will take to assure that activities associated with construction of the Weymouth Compressor Station (Compressor Station) will comply with the Massachusetts Contingency Plan (MCP; 310 Code of Massachusetts Regulations [CMR] 40.0000) and will not cause any significant risk to public health or the environment.”).