

## TALKING POINTS TO HELP WRITE YOUR COMMENTS ON NC ACP 401 PERMIT

### Impacts on Groundwater

The ACP 401 application and construction detail fail to acknowledge the likely impacts of construction and pipeline operation on local groundwater or to ensure measures will be taken to prevent them. The project could decrease groundwater recharge, thus decreasing the groundwater discharge to streams and wetlands, as well, thus decreasing stream base flow and ability to maintain the water level in wetlands during dry periods.

Trench construction and backfill changes the ability of water to flow (conductivity) through impacted soils, which can cause preferential flow of groundwater or blocked flow. Higher conductivity can cause an aquifer to drain more quickly and ease the pathway for contaminants to reach wetlands and streams. Lower conductivity backfill would restrict groundwater flow that intersects the trench, possibly diverting it from its natural discharge point.

For most of its length in NC, the ACP would be located above the Northern Coastal Plain Aquifer system, especially vulnerable to contamination, with uppermost sand aquifers at shallow depths being susceptible to human activities. Given the large number of households within ½ mile of the ACP corridor dependent on well water, construction could impact many household water supplies. Also, areas of shallow bedrock must be surveyed for heavy metals, radioactive materials and acid-producing rocks with potential to contaminate nearby water sources.

There are a large number of private wells within 150 ft. of the pipeline workspace in Nash, Johnston and Cumberland Counties. At the time of the DEIS release, ACP and its contractors had not completed a survey of wells within 150 ft. due to lack of survey access. A 150 ft. buffer between water wells and the construction workspace is not adequate. Approximate locations for wells within 500 feet of construction workplace could be facilitated by GIS location of all residences outside city limits or locations of public water utilities' groundwater sources.

Surface disturbances, clearing and trenching can impact both surface water drainage and groundwater recharge patterns, with the largest impacts to shallow surficial aquifers. No protocols are in place to prevent impacts such as compaction from affecting recharge of shallow aquifers or infiltration of toxic or hazardous materials, including fuels, oils, lubricants, hydraulic fluids, and explosives.

ACP says it will test wells and springs within 150 feet of the construction workspace (within 500 feet of the construction workspace only in karst terrain). In addition to well yields, water quality parameters to be tested include pH, total suspended solids, total dissolved solids, oil and grease and a range of inorganic contaminants. The well testing, both before and after construction, must include all water supply wells within 500 feet of the construction workspace (rather than 150) and include ALL substances which could impact groundwater, including explosives, lubricants, and components of natural gas liquids. All well tests must be performed by certified

labs to detection levels below NC groundwater (2L) standards. Results must be reported to well owners and DEQ within 20 days, with instructions for initiating a contamination claim.

Possible contaminated sites that could be disturbed during construction include one Superfund site and 3 brownfield sites located in NC close to the main pipeline, as well as 9 leaking underground storage tank sites. These sites must be well marked and well testing within 1,00 feet must include all known contaminants of concern.

All pollution prevention plans prepared by ACP to avoid or minimize impacts during construction and operation must be readily available to the public in plain language, and reviewed as part of the permit. The enforcement of construction violations at all stages must be transparent. Refueling or handling of fuels and other toxic or hazardous materials must be prevented within 500 feet of wetlands, private water supplies or municipal water supply wells.

*End your comments by asking the NC Division of Water Resources to deny the 401 permit for the Atlantic Coast Pipeline.*

**The deadline for comments is August 19<sup>th</sup> at 5:00 pm.**

Email your comments to [publiccomments@ncdenr.gov](mailto:publiccomments@ncdenr.gov) (include "ACP" in subject line).

Or, mail your comments to 401 Permitting, 1617 Mail Service Center, Raleigh, NC 27699