



REGION 4

ATLANTA, GA 30303

February 4, 2025

Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: EPA Comments on the Final Environmental Impact Statement (FEIS) for the Ridgeline Expansion Project, East Tennessee Natural Gas, LLC (East Tennessee). FERC CP23-516-000, CP23-516-001, CEQ No. 20240243.

Dear Secretary Reese:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Energy Regulatory Commission's (FERC) FEIS for the above-referenced project, proposed by East Tennessee, in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and the EPA's authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. Among other things, it requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement, and to make the agency's comments public.

This FEIS examines the impacts to the natural and human environments resulting from the proposed construction and operation of approximately 122 miles of a new 30-inch-diameter natural gas transmission pipeline that would provide approximately 300,000 dekatherms per day of new firm natural gas transportation service to Tennessee Valley Authority's Kingston Fossil Plant. The proposed project is located in the Trousdale, Smith, Jackson, Putnam, Overton, Fentress, Morgan, and Roane Counties, Tennessee, and about 112.6 miles of the new pipeline would be co-located with existing pipeline right-of-way. The project also includes a new 14,600-horsepower electric compressor station and associated solar array (Hartsville Compressor Station), a new meter and regulating station, modifications to two existing meter and regulation stations in Trousdale County, and a new delivery meter station to the Kingston Plant in Roane County. Additionally, East Tennessee proposes to remove 24 miles of abandoned-in-place pipe segments along East Tennessee's existing 22-inch-diameter Line 3100-1 associated with various prior pipeline replacement projects and would relay the new pipe into the same trenches.

The FEIS examined the following alternatives: No Action Alternative, System Alternatives, Major Pipeline Route Alternatives, and minor route variations. According to the FEIS, approximately 92 percent of the pipeline route will be adjacent or overlapping with the existing 3100 Line and powerline.


Approximately 2,551 acres would be impacted by the proposed project, about 1,726 acres would be restored and the remaining 825 acres would be maintained for the Project operation.

The EPA served as a cooperating agency on the proposed project and provided extensive recommendations throughout the NEPA process. The EPA appreciates FERC's response to the EPA's comments and recommendations. Based on the EPA's review of the FEIS, the EPA has identified some remaining comments that should be addressed.

The EPA appreciates the opportunity to review and comment on this FEIS. If you have questions or wish to discuss our comments and recommendations, please contact Maria R. Clark at (404) 562-9513 or clark.maria@epa.gov.

Sincerely,

**DANIEL
HOLLIMAN**

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Daniel Holliman
Acting Branch Manager
National Environmental Policy Act and Special
Programs Coordination

Enclosure: Technical Comments

¹ https://www.calexico.ca.gov/vertical/sites/%7B342ED706-1EBB-4FDE-BD1E-9543BAD44C09%7D/uploads/7.0_Noise_Element.pdf
<https://pubmed.ncbi.nlm.nih.gov/28369113/>

ENCLOSURE

EPA Technical Comments on the FEIS for the Ridgeline Expansion Project FERC CP23-516-000, CP23-516-001, CEQ No. 20240243.

Clean Air Act (Section 4.10.2): Section 4.10.2 of the FEIS inaccurately states that “TDEC has primary jurisdiction over air emissions produced by stationary sources associated with the Project and is delegated by the EPA to implement federal air quality programs.” State and local agencies are required, pursuant to the Clean Air Act (CAA) and applicable federal regulations at 40 CFR 51.160-164, to adopt regulations for major and non-major sources. The requirements must be consistent with and at least as protective as the CAA and applicable federal regulations. The State provisions are then submitted to the EPA for approval and incorporation into the applicable State Implementation Plan. Only in certain limited cases are CAA requirements “delegated” to a state or local agency.

Recommendation: Correct the statement about air quality program jurisdiction described above by deleting the clause beginning with “and is delegated”.

Public Involvement (Section 4.7.4): In Section 4.7.4., languages spoken within the block groups with limited English proficient households, were identified in the FEIS. For example, Spanish was identified as the language spoken for three of the block groups.

Recommendation: For all communities to benefit from the mitigation measures committed to by the applicant and conditions required by FERC, translate public communications that involve mitigation measures or conditions, including signage and written notices, in the primary languages spoken by the households that will be directly impacted by the project construction and operation.

¹ https://www.calexico.ca.gov/vertical/sites/%7B342ED706-1EBB-4FDE-BD1E-9543BAD44C09%7D/uploads/7.0_Noise_Element.pdf
<https://pubmed.ncbi.nlm.nih.gov/28369113/>