



**U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration**

**Natural Gas Distribution Infrastructure Safety and Modernization  
Grant Program**

**Entity**

**Location**

**Categorical Exclusion Documentation**

**CE Number**

**PHMSA Office of Planning and Analytics  
Environmental Analysis and Compliance Division**

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**Entity Contact Info**

## 1. Overview

This document serves as the Pipeline and Hazardous Materials Safety Administration’s (PHMSA) determination of applicability of the Department of Energy’s (DOE) B5.4 categorical exclusion (CE) for repair or replacement of pipelines for the project identified below. Effective July 3, 2024, PHMSA adopted DOE’s CE in accordance with the Section 109 of the National Environmental Policy Act, enacted as part of the Fiscal Responsibility Act of 2023, which allows a federal agency to “adopt” another federal agency’s CEs for proposed actions.

For projects that PHMSA determines DOE CE B5.4 is applicable, it must: (1) consider the presence of any integral elements at 10 CFR part 1021, subpart D, appendix B (1)-(5); and, (2) evaluate the proposed action for extraordinary circumstances in which a normally excluded action may have a significant effect. If an extraordinary circumstance is present, the agency nevertheless may categorically exclude the proposed action if the agency determines that there are circumstances that lessen the impacts or other conditions sufficient to avoid significant effects.

The project identified below was provisionally awarded federal funding through PHMSA’s Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant program. This document describes the proposed action, the anticipated impacts of that action, any circumstances or conditions that must be implemented to ensure significant effects are avoided, and documents the approval of the project as a categorical exclusion.

## 2. Project Description/Proposed Action

<b>Project Title</b>	
<b>Project Location</b>	
<b>Project Description/Proposed Action:</b>	

<b>Question</b>	<b>Information</b>
Describe the location and dimensions of all ground disturbing activities and provide a map depicting the location(s) where ground disturbance would occur. ( <i>e.g.</i> , width and depth of trenching or excavation for borings, location of regulator stations, etc.)	
If the exact location where new pipe would be installed or where other work would occur, provide the width of the ROW or the general area encompassing the footprint where all work would occur. Include the anticipated footprint and depth of new pipe installation.	
Will service lines be replaced?	

Will meters or other equipment be replaced? If so, provide a description detailing what meter components, etc. will be replaced and indicate if this will require ground disturbance, if the equipment will be attached to existing structures, etc.	
What portions of the pipeline will be abandoned? What portions of the pipeline will be removed?	

Question	Information
What construction methods will be used?	
Does the project require a new right-of-way not currently in the ownership of the utility? If new ROW will occur, please provide a description of the property to be acquired (existing condition and land use).	
How many linear feet of pipe will be replaced or repaired?	

## 2.1. Proposed Pipeline Replacement Details

Existing Pipeline Length in feet	Pipeline Diameter in inches	Pipeline Material (cast iron, bare steel, coated steel, PVC)	Operating Pressure (PSI)	Reduced Pressure if Possible (PSI)	Year installed if known.

### 3. Resource Review

The following information represents questions posed to the project proponent identified on the cover page of this document regarding the project that was provisionally awarded grant funds under PHMSA's NGDISM program. The information and justification section includes the applicant's response. PHMSA's conclusions are based on applicant provided information, independently reviewed by PHMSA. The mitigation measures were reviewed and confirmed by the project proponent.

Air Quality	
Question	Information and Justification
Is the project located in an area designated by the EPA as non-attainment or maintenance status for one or more of the National Ambient Air Quality Standards (NAAQS) <sup>1</sup> ?	
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year)?	
Will mitigation measures be used to capture blowdown <sup>2</sup> ?	
Will project proponent commit to reducing pressure on the segments/lines to be replaced, prior to venting?	
Estimate the current leak rate per mile based on the type of pipeline material. Based on mileage of replacement and new pipeline material, estimate the total reduction of natural gas leakage.	
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality?	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"><li>• Use on-road and non-road vehicles efficiently by minimizing speeds and the number of vehicles;</li><li>• Minimize excavation to the greatest extent practical;</li><li>• Use cleaner, newer, non-road equipment as much as practicable;</li><li>• Minimize all vehicle idling and at minimum, conforming with local idling regulations;</li></ul>	

<sup>1</sup> [Criteria Air Pollutants | US EPA](#)

<sup>2</sup> Blowdown refers to the venting of natural gas in current facilities, in order to begin rehabilitation, repair, or replacement activities.

- Ensure that all vehicles and equipment are in proper operating condition;
- On-road and non-road engines must meet EPA exhaust emission standards (40 CFR Parts 85, 86, and 89);
- Cover open-bodied trucks while transporting materials;
- Use water or other approved dust suppressants at construction sites and on unpaved roadways, as necessary;
- Minimize the area of soil disturbance to that necessary for construction;
- Minimize construction site traffic by using offsite parking and shuttle buses, as necessary; and
- Minimize the idling of equipment.

Water Resources	
Question	Information and Justification
Are there water resources within the project area, such as wetlands, streams, rivers, or floodplains? If so, would the project temporarily or permanently impact wetlands or waterways? If water resources are present but will not be impacted, please describe how these impacts will be avoided (e.g. directional boring under the resource, etc.)	
Under the Clean Water Act, is a Section 401 State certification potentially required? If yes, describe anticipated permit and how project proponent will ensure permit compliance.	
Under the Clean Water Act, is a USACE Section 404 Permit required for the discharge of dredge and fill material? If yes, describe anticipated permit and how project proponent will ensure permit compliance.	
Under the Clean Water Act, is an EPA or State Section 402 permit required for the discharge of pollutants into the waters of the United States? Is a Stormwater Pollution Prevention Plan (SWPPP) required? If yes, describe how project proponent will ensure permit compliance.	
Will work activities take place within a FEMA designated floodplain? If so, describe any permanent or temporary impacts and the required coordination efforts with state or local floodplain regulatory agencies.	

Is the project located in a Coastal Zone? Will the proposed project activities affect any coastal use or natural resource of the coastal zone, requiring a Consistency Determination and Certification? Please provide any relevant information regarding how the project proponent normally coordinates with the applicable state's coastal zone management agency.	
Is there any other information relevant to the project area or the proposed work as it pertains to Water Resources.	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"> <li>• Avoid staging and laydown areas in wetlands or floodplains;</li> <li>• Reseed disturbed areas with native plant species;</li> <li>• Restore disturbed areas to pre-construction contours;</li> <li>• Adhere to additional mitigation measures in accordance with applicable permits;</li> <li>• Use Best Management Practices during construction to control sediment and erosion and prevent pollutants from entering adjacent waterways; and</li> <li>• Coordinate with the appropriate FEMA representative or local floodplain coordinator when work will occur in FEMA designated special flood hazard areas, as needed.</li> </ul>	

Groundwater and Hazardous Materials/Waste	
Question	Information and Justification
Does the project have potential to encounter and impact groundwater? If yes, describe potential impacts from construction activities.	
Will the project require boring or directional drilling that may require pits containing mud and inadvertent return fluids? If yes, describe measures that will be taken during construction activities to prevent impacts to groundwater resources. If boring or directional drilling will not require pits, please describe why these will not be required and how fluids will be contained.	
Will the project potentially involve a site(s) contaminated by hazardous waste? Sites identified as containing hazardous waste/materials can be	

identified through EPA's NEPAAssist tool <a href="https://nepassisttool.epa.gov/nepassist/nepamap.aspx">https://nepassisttool.epa.gov/nepassist/nepamap.aspx</a> or local databases identifying Superfund, Brownfields, etc. If hazmat sites are identified in or near areas where work will occur, describe how the proposed work poses no risk or what mitigative measures will be used to avoid identified sites.	
Is there any indication that the pipeline was ever used to convey coal gas? If yes, PHMSA will work with the project proponent for required studies.	
Does the project have the potential to encounter or disturb lead pipes or asbestos?	
Is there any other information relevant to the project area or the proposed work as it pertains to Groundwater and hazardous materials/waste.	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"> <li>• Develop and adhere to a Stormwater Pollution Prevention Plan;</li> <li>• Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known waste;</li> <li>• Adhere to applicable groundwater and soil management plans; and</li> <li>• Develop and implement an HDD Inadvertent Return and Contingency Plan to establish operational procedures and responsibilities for the prevention, containment, and clean-up of inadvertent returns associated with the directional drilling on the project.</li> </ul>	

Biological Resources	
Question	Information and Justification
Based on review of IPaC and NOAA Fisheries database, are there any federally threatened or endangered species or critical habitat potentially occurring within the geographic range of the project area?	
Are there any known State or Federally, listed threatened or endangered species or habitat areas for State or Federally listed species present in or immediately adjacent to areas where work will occur? If yes, describe how project proponent will	

avoid impacts to listed species or habitat. If there are potential impacts to federally listed species or critical habitat, PHMSA will work with the project proponent to conduct necessary consultation with resource agencies.	
Will there be any tree clearing or removal of woody vegetation involved with the proposed work?	
Is there any other information relevant to the project area or the proposed work as it pertains to Biological Resources?	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b>	

Cultural Resources	
Question	Information and Justification
Please describe all ground disturbing activities associated with the project (including pipeline installation, service line installation, gas meter replacements, metering station construction or demolition, etc.). What is the maximum depth, width and length of excavations for each activity involving ground disturbance?	
Will ground disturbance take place entirely in existing ROW or utility easements? Will it be restricted entirely to paved areas or will some disturbance take place in grassy, undisturbed, or natural areas?	
Has the entire project area (width, length and depth) been previously disturbed by the original installation or other activities? If so, provide documentation or a description of prior ground disturbances, such as road or utility cross sections, plans or as-builts. If documentation is not available provide justification for how the ground was previously disturbed.	



Does the project involve any physical impacts to buildings or structures? Please provide a description of the work that may affect buildings or structures and provide addresses and a map showing the locations.	
Please describe the project area and provide several photographs to show the character of the project area and surrounding properties. Is it a residential or commercial area? Are the nearby properties old or modern? Streetscapes and views looking down the ROW to show flanking properties are preferred. Please provide a photo key or captions to identify where the photos were taken and what they are showing.	
Does the project involve construction or installation of any new aboveground components? If so, describe the components, identify their location and provide representative images of the components.	
Are there any nearby properties or resources that either appear to be or are documented to have been constructed more than 45 years ago? <sup>3</sup> Does there appear to be a group of properties of similar age, design, or method of construction? Or are there any designed landscapes such as a park or cemetery? Please provide photographs of any properties that may be more than 45 years in age and would have the potential to be affected by the project (such as properties that include meter replacements, service line replacements or buildings within 10 feet of the areas proposed for pipeline main replacement under pavement). Multiple properties may be photographed together in a streetscape view and if there are many properties over 45 years in age, representative photos may be provided of a neighborhood rather than individual photos of each property.	
Will project implementation require removal or disturbance of any stone or brick sidewalk,	

<sup>3</sup> Local tax and property records or historic maps may indicate dates of construction.

<p>roadway, or landscape materials or other potentially old or unique features? Please provide a handful of representative photos of the project area to show the character of the roadway and sidewalk materials in the project and staging areas. Include a photo key or captions of what the photos are showing and where they were taken.</p>	
<p>Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?</p>	
<p><b>Conclusion:</b></p>	
<p><b>Mitigation Measures:</b></p> <ul style="list-style-type: none"> <li>• If, during project implementation, a previously undiscovered archaeological or cultural resource that is or could reasonably be a historic property is encountered or a previously known historic property will be affected in an unanticipated manner, all project activities in the vicinity of the discovery will cease and ENTITY NAME will immediately notify PHMSA. This may include discovery of cultural features (e.g., foundations, water wells, trash pits, etc.) or artifacts (e.g., pottery, stone tools and flakes, animal bones, etc.) or damage to a historic property that was not anticipated. PHMSA will notify the State Historic Preservation Office and participating federally recognized tribes and conduct consultation as appropriate in accordance with 36 CFR § 800.13. Construction in the area of the discovery must not resume until PHMSA provides further direction. ENTITY NAME will strictly adhere to PHMSA’s Unanticipated Discoveries Protocols.</li> <li>• In the event that unmarked human remains are encountered during permitted activities, all work shall halt and ENTITY NAME shall immediately contact PHMSA as well as the proper authorities in accordance with applicable state statutes to determine if the discovery is subject to a criminal investigation, of Native American origin, or associated with a potential archaeological resource. At all times human remains must be treated with the utmost dignity and respect. Human remains and associated artifacts will be left in place and not disturbed. No skeletal remains or materials associated with the remains will be photographed, collected, or removed until PHMSA has conducted the appropriate consultation and developed a plan of action. Project activities shall not resume until PHMSA provides further direction.</li> <li>• All work, material, equipment, and staging to remain within the road’s existing right-of-way or utility easement or other staging areas as identified in the environmental documentation. If the scope of work changes in any way that may alter the effects to historic properties as described herein, the grant recipient must notify PHMSA, and consultation may be reopened under Section 106.</li> </ul>	

Section 4(f)	
Question	Information and Justification
Are there Section 4(f) properties within or immediately adjacent to the project area? 4(f) properties include publicly owned parks, recreational areas, wildlife or waterfowl refuges, and historic sites. If yes, provide a list of properties and a map of 4(f) properties as an attachment.	
Will any construction activities temporarily impact use of the park including but not limited to access to any portion of the park, parking lots, trails, recreational fields, etc.?	
Will any construction activities occur within the property boundaries of a Section 4(f) property? If so, please detail these activities and indicate if these are temporary or permanent uses of the Section 4(f) property.	
Is there any other information relevant to the project area or the proposed work as it pertains to Section 4(f)?	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b>	

Land Use and Transportation	
Question	Information and Justification
Will the full extent of the project boundaries remain within the existing right-of-way or easements? If no, please describe any right-of-way acquisitions or additional easements needed.	
Will the project result in detours, transportation restrictions, or other impacts to normal traffic flow or to existing transportation facilities during construction? How long are construction activities estimated to last?	

Will there be any permanent change to existing transportation facilities? If so, what are the changes, and how would the changes affect the public?	
Will the project interrupt or impede emergency response services from fire, police, ambulance or any other emergency or safety response providers? If so, describe any coordination that will occur with emergency response providers? How long will service interruptions last, if applicable?	
Is there any other information relevant to the project area or the proposed work as it pertains to Land Use and Transportation?	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"> <li>• Restore all impacted areas to pre-construction conditions;</li> <li>• Maintain traffic flows to the extent possible;</li> <li>• Use traffic control measures to assist traffic negotiating through construction areas, as needed;</li> <li>• Coordinate with state and local agencies regarding detours and routing adjustments during construction;</li> <li>• Notify potentially impacted residents and business owners (access, parking, etc.); and</li> <li>• Have a traffic control plan in place, prior to construction, and coordinate with the appropriate agency well in advance of any impacted emergency services or essential agency functions.</li> </ul>	

Noise and Vibration	
Question	Information and Justification
Will the project construction occur for longer than a month at a single project location?	
Will the project location be in proximity (less than 50 feet.) to noise sensitive receivers (residences, schools, houses of worship, etc.)? If so, what measures will be taken to reduce noise and vibration impacts to sensitive receptors?	
Will the project require high-noise and vibration inducing construction methods? If so, please specify.	

Will the project comply with state and local ordinances? If so, identify applicable ordinances and limitations on noise/vibration times or sound levels.	
Will construction activities require large bulldozers, hoe ram, or other vibratory equipment within 20 feet of a structure?	
Is there any other information relevant to the project area or the proposed work as it pertains to Noise and Vibration?	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b> <ul style="list-style-type: none"> <li>Adhere to all local, city and state noise regulations.</li> </ul>	

Community Effects	
Question	Information and Justification
Will the project displace existing residents or workers from their homes and communities? If so, what is the expected duration?	
Will the project require service disruptions to homes and communities? If so, what is the expected communication and outreach plan to the residents and the duration of the outages?	
Are there populations with Limited English Proficiency located in the project area? If so, what measures will be taken to provide communications in other languages?	
Is there any other information relevant to the project area or the proposed work as it pertains to Community Effects?	
<b>Conclusion:</b>	

**Mitigation Measures:**

- Provide advanced notification of service disruptions and construction schedule to all affected parties including residents and businesses adjacent to the project area;
- Coordinate service disruptions and construction schedule with local community leaders and groups, as applicable;
- Maintain service at temporary facilities, if appropriate;
- Promote public engagement to reduce project delivery delays and public controversy;
- Develop outreach plans to involve and engage all populations; and
- ENTITY will have translators available to communicate with residents with limited English proficiency.

Safety	
Question	Information and Justification
Has a risk profile been developed to describe the condition of the current infrastructure and potential safety concerns?	
Has a public awareness program been developed and implemented that follows the guidance provided by the American Petroleum Institute (API) Recommended Practice (RP) 1162?	
Does the project area include pipes prone to leakage?	
Will construction safety methods and procedures to protect human health and prevent/minimize hazardous materials releases during construction, including personal protection, workplace monitoring and site-specific health and safety plans, be utilized? If yes, document measures and reference appropriate safety plans.	
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	
Is there any other information relevant to the project area or the proposed work as it pertains to Safety?	
<b>Conclusion:</b>	
<b>Mitigation Measures:</b>	

- Incorporate public awareness programs, as necessary;
- Use standard construction safety methods and procedures;
- Ensure DIMP procedures are updated as necessary;
- Ensure work is constructed in accordance with industry best practices; and
- Comply with all local, state, and federal regulations.

#### **4. Categorical Exclusion Determination**

##### **Categorical Exclusions to be Applied:**

As the proposed action is repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way to an existing natural gas pipeline, the following Categorical Exclusion, as listed in the DOE NEPA implementing procedures, 10 CFR 1021, adopted by PHMSA effective July 3, 2024<sup>4</sup> applies:

##### **B5.4 Repair or Replacement of Pipelines**

Repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way, provided that the actions are in accordance with applicable requirements (such as Army Corps of Engineers permits under section 404 of the Clean Water Act). Pipelines may convey materials including, but not limited to, air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water.

##### **Eligibility Criteria:**

The proposed activity meets the eligibility criteria of 10 CFR 1021.41O(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(1)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation. The "Integral Elements" of 10 CFR 1021 are satisfied because the proposed action will not:

1. Threaten a violation of statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and Executive Orders;
2. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities;
3. Disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)-excluded petroleum and natural gas products that preexist in the environment such that would be uncontrolled or un-permitted releases;

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<sup>4</sup> [Federal Register :: Adoption of Department of Energy Categorical Exclusion Under the National Environmental Policy Act](#)

4. Have the potential to cause significant impacts on environmentally sensitive resources, which includes (i) property (sites, buildings, structures, and objects) of historical, archeological, or architectural significance; (ii) federally-listed and state-listed threatened or endangered species or their habitat, federally-protected marine mammals and essential fish habitat and otherwise federally-protected species; (iii) floodplains and wetlands; (iv) federally and state designated areas (wilderness areas, national parks, national monuments, national natural landmarks, wild and scenic rivers, wildlife refuges, scenic areas, and marine sanctuaries); (v) prime or unique farmland; (vi) special sources of water (sole-source aquifers, wellhead protection areas, and other vital water resources); and (vii) tundra, coral reefs, or rain forests); or
5. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

**Compliance Action:**

The proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, or includes conditions that must be implemented to ensure significant effects are avoided, and meets the requirements for the CE referenced above. Based on my review of the proposed action, I have determined that the proposed action fits within the specified categorical exclusion, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

**PHMSA Approval:**