



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

**Natural Gas Distribution Infrastructure Safety and Modernization Grant
Program
Leitchfield Utilities Commission
Leitchfield, Kentucky**

**Categorical Exclusion Documentation
NGDISM-FY23-CE-2024-13**

**PHMSA Office of Planning and Analytics
Environmental Analysis and Compliance Division
Amanda Murphy
Amanda.L.Murphy@dot.gov**

**Leitchfield Utilities
Dwight Embry
dwight.embry@Leitchfield.org**

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

Project Title	Leitchfield Utilities Natural Gas Pipeline Replacement
Project Location	City of Leitchfield, Grayson County, Kentucky
Project Description	
<p>The project proposes to replace approximately 1 mile of 2-inch steel gas mains with 4-inch polyethylene pipe on Wallace Avenue, replacing 0.2 miles of steel gas main along Floyd Street and North Main Street, as well as 0.4 miles of steel gas main on Shaw Station Road (See Appendix A). Service lines will be replaced to Grayson Manor, the Owensboro Health Twin Lakes Medical Center, the H.W. Wilkey Elementary School, the Grayson County Middle school, and seventeen houses along Wallace Avenue. The distribution lines being replaced were originally installed in 1966. The project will use both directional boring as well as open cut trenching with a mini excavator, up to a depth of 30 inches. The size of the bore pit will be 20 feet by 6 feet, located on the east side of Brandenburg Road, immediately north of its junction with Main Street.</p> <p>All work will take place within previously disturbed soil in the existing right of way (ROW) and existing utility easements. The staging areas for the Undertaking will be on the grassy expanse on the north side of Shaw Station Road, just west of the entrance to the Grayson County Detention Center; the parking lot of the old D.G. Hayes Grocery Co. building on the southeast side of Floyd Street; and in the grassy expanse north of the Springview</p>	

Rehabilitation Center and adjacent to its driveway, parallel to Wallace Street.

Question	Information
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.)	The primary construction methods used will be installation by directional bore or replacement through open cut trenching adjacent to existing pipe. The project will use both directional boring as well as open cut trenching with a mini excavator, up to a depth of 30 inches. The size of the bore pit will be 20 feet by 6 feet.
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.	Work would occur within the 10-foot ROW. The maximum depth of new pipe installation is 48 inches, and the maximum width of trenching is 24 inches for all project segments. Any acquisition of new right of way or easement would adhere to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
Will service lines be replaced?	Yes.
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.	No.
What portions of the pipeline will be abandoned? What portions of the pipeline will be removed?	All current pipeline will be abandoned in place.

Question	Information
What construction methods will be used?	Directional boring and open cut trenching.

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).	No new right-of-way or easement needed.
How many linear feet of pipe will be replaced or repaired?	8,448.00 Linear Feet

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.
8,448.00 feet	2.00	Coated steel	50.00		1966

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) ¹ ?	No, the area is in Grayson County, which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on review of the EPA Greenbook.
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year)?	No.
Will mitigation measures be used to capture blowdown ² ?	No.
Will project proponent commit to reducing pressure on the segments/lines to be replaced, prior to venting?	No.
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.	The existing leak rate is estimated to be 3,396 kilograms (kg)/year(yr). Replacement of pipelines would result in a leak rate of approximately 46 kg/yr or a reduction of approximately 66,967 kg over a 20-yr timeframe.
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality?	No.

¹ [Criteria Air Pollutants | US EPA](#)

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

Conclusion:

The project area is located in Grayson County, KY which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on EPA's Greenbook. The proposed project would result in minor air quality impacts associated with construction activities, including the intentional venting of natural gas contained in the existing pipelines prior to replacement. Pipeline blowdowns are typically necessary to ensure that construction and maintenance work can be conducted safely on depressurized natural gas facilities and pipelines. Venting natural gas is required when service is switched from the existing line to the newly constructed line, but the volume of vented gas can depend on the ability to reduce pressure on the pipe segment or other mitigation actions. During project construction there will be some increase in ambient dust particulate from machinery and soil disturbances. These will be only temporary in nature and all efforts will be made through proper construction methods to ensure dust control and properly functioning equipment. Replacing leak prone pipe with newer, more durable materials will reduce natural gas leaks. Therefore, it is PHMSA's assessment that the proposed project would provide a net benefit to air quality from the overall reduction of leaking natural gas and that no adverse indirect or cumulative impacts would result from the project.

Mitigation Measures:

- Use on-road and non-road vehicles efficiently by minimizing speeds and the number of vehicles;
- Minimize excavation to the greatest extent practical;
- Use cleaner, newer, non-road equipment as much as practicable;
- Minimize all vehicle idling and at minimum, conforming with local idling regulations;
- 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 (<i>e.g.</i> directional boring under the resource, etc.)	No, according to United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), there are no wetlands, streams, or special flood hazard areas in the project area.

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.	No.
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.	No.
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.	No. No.
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.	No work activities will occur in a FEMA designated floodplain.
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.	No, the project is not located within a designated coastal zone.
Is there any other information relevant to the project area or the proposed work as it pertains to Water Resources.	No.

Conclusion:

PHMSA reviewed NWI maps, as well as the FEMA national flood hazard maps. No water resources occur within or directly adjacent to the project area. The project will be conducted on residential streets and at individual residences. The project would only involve the replacement of main lines and the service lines and connections from the main pipeline to the residence. By avoiding direct impacts to aquatic resources and implementing best management practices during construction, PHMSA does not anticipate any adverse impacts to water resources.

Mitigation Measures:

No mitigation needed.

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.	Yes, due to ground disturbance activities, there is a potential to encounter groundwater during excavation. No impact is expected as no hazardous materials would be in contact with the groundwater.
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.	Yes. The project may involve horizontal directional drilling and may require pits. Construction crews would be required to contain all inadvertent returns of drilling fluids via pits, vacuum truck, or other methods and dispose of them properly.
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 https://nepassisttool.epa.gov/nepassist/nepamap.aspx 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.	No. Based on review of EPA's NEPAAssist tool, numerous hazardous waste sites were identified near the project area, but no brownfield or superfund sites were identified within the project area.
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.	No.

Does the project have the potential to encounter or disturb lead pipes or asbestos?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Groundwater and hazardous materials/waste.	No.
<p>Conclusion:</p> <p>PHMSA reviewed EPA's NEPAAssist to identify any brownfield properties, hazardous waste sites, and superfund sites. There were numerous hazardous waste sites identified near the project area; however, there were no brownfields sites or superfund sites identified in the project area. Hazardous waste information is identified in the Resource Conservation and Recovery Act Information (RCRAInfo), which is a national program that includes an inventory of all generators, transporters, treaters, storers, and disposers of hazardous waste that are required to provide information about their activities to state environmental agencies.</p>	
<p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Develop and adhere to a Stormwater Pollution Prevention Plan; • Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known waste; • Adhere to applicable groundwater and soil management plans; and • 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. 	

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?	Yes, based on review of the USFWS's Information for Planning and Consultation (IPaC). In addition, Office of Kentucky Nature Preserves state resources were inventoried to identify state listed species.

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.	No. Due to the nature of construction no impacts are expected. Shallow excavation will be conducted in previously disturbed and developed areas. Minimal sapling tree clearing is foreseen as part of this project. No endangered or threatened species will be impacted.
Will there be any tree clearing or removal of woody vegetation involved with the proposed work?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Biological Resources?	No.

Conclusion:

The project area is built out and is comprised of previously disturbed developed and residential areas. PHMSA requested an official species list through the USFWS's IPaC website. The following species were identified as potentially occurring in the project area:

- Gray bat (*Myotis grisescens*) endangered
- Indiana bat (*Myotis sodalist*) endangered
- Tricolored bat (*Perimyotis subflavus*) proposed endangered
- Whooping crane (*Grus americana*) experimental population, non-essential
- Clubshell (*Pleurobema clava*) endangered
- Fanshell (*Cyprogenia stegaria*) endangered
- Northern Riffleshell (*Epiolasma rangiana*) endangered
- Monarch butterfly (*Danaus plexippus*) proposed threatened
- Pink Mucket (*Lampsilis abrupta*) endangered
- Rabbitsfoot (*Quadrula cylindrica cylindrica*) threatened
- Salamander Mussel (*Simpsonia ambigua*) proposed endangered
- Spectaclecase (*Cumberlandia monodonta*) endangered

There was no critical habitat identified within the project area.

Several state-listed species also occur within the geographical range, however based on the disturbed nature of the project area, no habitat is present for these species.

The work would occur within existing ROW where the footprint of the proposed work has already been disturbed and is maintained. Because these areas are within ROW that has been previously impacted (pipeline laid in the ground in close proximity to the location where new pipes would be laid and subsequently paved), the immediate project area has very limited biological resources present. Therefore, in accordance with Section 7 of the Endangered Species Act (ESA), PHMSA's assessment is that the project would have no effect to the gray bat, Indiana bat, clubshell, fanshell, Northern riffleshell, pink mucket, rabbitsfoot, or spectaclecase. Under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their action would jeopardize the continued existence of a proposed species; therefore, PHMSA's assessment is that the project is unlikely to jeopardize the continued existence of the salamander mussel, tricolored bat, or monarch butterfly. PHMSA's assessment is that the project would have no adverse impacts to state-listed species and would not cause more than minor adverse impacts to other biological resources in the project area.

Mitigation Measures:

- No mitigation measures are necessary.

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?	The primary construction methods used will be installation by directional bore or replacement through open cut trenching adjacent to existing pipe. The project will use both directional boring as well as open cut trenching with a mini excavator, up to a depth of 30 inches. The size of the bore pit will be 20 feet by 6 feet.
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?	Yes, disturbance will take place in existing ROW, with some work occurring in grassy areas next to driveways/roadways.
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.	Yes. This project is to replace old pipelines in areas that have been 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.	No.
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.	The project area is a mixture of commercial and residential properties. Properties are a mixture of old and modern.
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.	No.

<p>Are there any nearby properties or resources that either appear to be or are documented to have been constructed more than 45 years ago?³ 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.</p>	<p>Yes, there are properties that have been constructed more than 45 years ago and appear to have a similar age, design, or method of construction.</p> <p>There are no designed landscapes in the project area.</p>
<p>Will project implementation require removal or disturbance of any stone or brick sidewalk, 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>No.</p>
<p>Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?</p>	<p>No.</p>

³ Local tax and property records or historic maps may indicate dates of construction.

Conclusion:

PHMSA identified properties based on available information on previously identified historic properties in the APE, including the National Register of Historic Places (NRHP) database and data received from the Kentucky Heritage Council. PHMSA also conducted research to determine if there are any previously unidentified properties within the APE that are 45 years of age or older and may be eligible for the NRHP. This research revealed no NRHP listed or eligible properties within the APE or within a half-mile.

A letter was sent on March 31, 2025, to the Kentucky State Historic Preservation Officer (SHPO) and all consulting parties outlining the Section 106 process, including a description of the undertaking, delineation and justification of the APE, identification of historic properties, and an evaluation and proposed finding of effects. Based on this consultation, PHMSA proposed a finding that the Proposed Action would not adversely affect historic properties. PHMSA has requested comments on the Section 106 process, identification of historic properties, and proposed finding within 30 days of receipt of the letter.

PHMSA also invited the following federally recognized tribes to participate in consultation by separate letter on March 31, 2025:

- Cherokee Nation
- Eastern Band of Cherokee Indians North Carolina
- Osage Nation

Mitigation Measures:

- 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 Leitchfield Utilities will immediately notify PHMSA. This may include discovery of cultural features (*e.g.*, foundations, water wells, trash pits, etc.) and/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. Leitchfield Utilities will strictly adhere to PHMSA's *Unanticipated Discoveries Protocols*.
- In the event that unmarked human remains are encountered during permitted activities, all work shall halt and Leitchfield Utilities 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.
- 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.

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.	No.
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.?	No.

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.	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Section 4(f)?	No.
<p>Conclusion:</p> <p>Section 4(f) of the US Department of Transportation (USDOT) Act of 1966 as amended (Section 4(f)) (49 U.S.C. § 303(c)); is a federal law that applies to transportation projects that require funding or other approvals by the USDOT. Section 4(f) prohibits the Secretary of Transportation from approving any program or project which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or any land from an historic site of national, state, or local significance unless:</p> <ul style="list-style-type: none"> • There is no feasible and prudent alternative to the use of the land; and • The program or project includes all possible planning to minimize harm to such park, recreational area; wildlife and waterfowl refuge, or historic site, resulting from such use. <p>PHMSA conducted a review of the Project Area and confirmed that there are no publicly owned public parks, recreation areas, national, state, or local significant wildlife and waterfowl refuges, or any historic sites of national, state, or local significance affected by the project. Therefore, there would be no use of Section 4(f) resources.</p>	
<p>Mitigation Measures:</p> <ul style="list-style-type: none"> • No mitigation measures are necessary. 	

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.	Yes, all work on mains would take place within the existing ROW.
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?	Yes, minor traffic interruptions are anticipated during construction, which is anticipated to last 2 months.

Will there be any permanent change to existing transportation facilities? If so, what are the changes, and how would the changes affect the public?	No, there will be no permanent changes to transportation facilities.
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?	No, the project would not interrupt or impede emergency response services.
Is there any other information relevant to the project area or the proposed work as it pertains to Land Use and Transportation?	No.
<p>Conclusion:</p> <p>There will be no permanent changes to land use. The project is replacing/upgrading the existing pipe and would not include new pipeline to serve any additional areas. During construction, there may be short-term impacts to adjacent residences, businesses and normal traffic patterns. Potential impacts include an increase in noise, dust, and transportation accessibility, as a result of construction and construction staging.</p> <p>Local and state regulations guide the transport of machinery, equipment, and automobiles around the construction areas. Temporary traffic impacts may occur on the local road network and adjacent pedestrian routes. Any impacts will be coordinated with local and state agencies.</p>	
<p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Restore all impacted areas to pre-construction conditions; • Maintain traffic flows to the extent possible; • Use traffic control measures to assist traffic negotiating through construction areas, as needed; • Coordinate with state and local agencies regarding detours and routing adjustments during construction; • Notify potentially impacted residents and business owners (access, parking, etc.); and • 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. 	

Noise and Vibration	
Question	Information and Justification
Will the project construction occur for longer than a month at a single project location?	No.

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?	No.
Will the project require high-noise and vibration inducing construction methods? If so, please specify.	No.
Will the project comply with state and local ordinances? If so, identify applicable ordinances and limitations on noise/vibration times or sound levels.	The project will comply with City of Leitchfield Noise Ordinance 92.03.
Will construction activities require large bulldozers, hoe ram, or other vibratory equipment within 20 feet of a structure?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Noise and Vibration?	No.
<p>Conclusion:</p> <p>The project is located in the City of Leitchfield. Ambient noise consists of a combination of environmental noise primarily from road traffic, construction, industry, population density and other sources.</p> <p>The pipeline replacement project would result in temporary construction noise impacts; however, no vibration impact should occur. Excavators, dump trucks, skid steers, rollers, pavers, and other similar construction equipment would be used to excavate a trench, lay pipe, compact soils and re-pave the affected areas. Construction for the project is anticipated to last 2 months. There are numerous sensitive noise receptors (<i>e.g.</i>, residences, schools, houses of worship, etc.) located adjacent to the streets where work would occur. Noise impacts experienced by these receptors would be minor and temporary, and no adverse vibration impacts would result from the proposed work. Construction would be required to abide by local noise control ordinances in the City of Leitchfield. Noise control measures would be chosen by the contractor and could include the following, as necessary:</p> <ul style="list-style-type: none"> • Use low noise emitting equipment; • Implement noise-deadening measures for truck loading and operations; • Conduct monitoring and maintenance of equipment to meet noise limits; • Use acoustic enclosures, shields, or shrouds for equipment; and • Minimize the use of generators or use quiet generators to power equipment. 	
<p>Mitigation Measures:</p> <ul style="list-style-type: none"> • Adhere to all local, city and/or state noise regulations. 	

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?	No.
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?	No.
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?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Community Effects?	No.
Conclusion: <p>The proposed project would result in an overall reduction in leaking natural gas pipelines. Construction activities would result in minor temporary air quality impacts, including the intentional venting of existing distribution lines prior to replacement. Noise impacts associated with construction are anticipated to be minor. The removal of leak prone pipe would reduce leaks and the potential for incidents, will result in an increase in pipeline safety across the system while also improving operation and reliability. PHMSA determined the project would not impact the local community.</p>	
Mitigation Measures: <ul style="list-style-type: none"> • 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; and • Develop outreach plans to involve and engage all populations. 	

Safety	
Question	Information and Justification

Has a risk profile been developed to describe the condition of the current infrastructure and potential safety concerns?	Yes, as described in the Distribution Integrity Management Program (DIMP).
Has a public awareness program been developed and implemented that follows the guidance provided by the American Petroleum Institute (API) Recommended Practice (RP) 1162?	Yes.
Does the project area include pipes prone to leakage?	Yes.
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.	<p>Yes. The construction contractor will be required to provide site-specific safety and health plans for project activities. The plans will be reviewed by the project engineer prior to the start of the project to ensure protection of human health and prevent/minimize hazardous material release during construction.</p> <p>Safety measures included in the Distribution Integrity Management Program (DIMP) will be followed.</p>
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Safety?	No.

Conclusion:

The project would reduce the risk profile of existing pipeline systems prone to leakage from the natural gas pipeline system and would also benefit the local community with the safe provision of natural gas. The project responds to the need to address the aging and leaky natural gas distribution system of pipelines. The repair, rehabilitation, or replacement of pipelines would be constructed in accordance with industry best practices and would comply with all local, state, and federal regulations, including those for safety.

The abandonment of the existing pipeline would be conducted in accordance with PHMSA requirements found in 49 CFR 192.727 and 195.402(c)(10). These requirements include disconnecting pipelines from all sources and supplies of gas, purging all combustibles and sealing the facilities left in place. These requirements for purging and sealing abandoned pipelines would ensure that the abandoned pipelines are properly purged and cleaned and pose no risk to safety in their abandoned state. Therefore, PHMSA's assessment is that this replacement project would improve the overall safety of the existing pipeline infrastructure.

Mitigation Measures:

- 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, 2024⁴ 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;
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

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

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:

Project Area Map



Leitchfield Utilities Commission Pipeline Replacement

Scale: 1:20,000 | Total Acreage: 12.8 | Leitchfield, Grayson County, Kentucky

0 0.2 0.4 Miles

Service Layer Credits: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HTU; NOAA National Centers for Environmental Information. Data refreshed February, 2025.