

TC Energy  
Columbia Gulf Transmission  
700 Louisiana Street, Suite 700  
Houston, TX 77002-2700  
Tel: 832-244-5257  
Jackson\_Lamb@tcenergy.com



October 27, 2023

Chief, MS Department of Environmental Quality  
Office of Pollution Control  
P.O. Box 2261  
Jackson, Mississippi 39225

Re: TC Energy – Columbia Gulf Transmission  
Double Quick Pipe Replacements and Hydrotest Project  
Humphreys County, Mississippi  
Request for Coverage Under Hydrostatic Test General Permit MSG13

To Whom it May Concern,

Columbia Gulf Transmission (CGT), a subsidiary of TC Energy, owns and operates natural gas transmission pipeline systems and associated appurtenances partially located within the state of Mississippi. The *Double Quick Pipe Replacements and Hydrotest Project* (Project) is located in the Town of Isola, Humphreys County, Mississippi (see Attachment A). CGT proposes to replace approximately 249 feet of natural gas transmission pipeline on CGT's Mainline 100 pipeline, 220 feet on Mainline 200 pipeline, and 195 feet on Mainline 300 pipeline on CGT's existing pipeline system. CGT is requesting Mississippi Department of Environmental Quality General Permit MSG13 coverage to discharge hydrostatic test water as described below.

The Project is required to comply with Pipeline Hazardous Materials Safety Administration safety requirements and is regulated by the Federal Energy Regulatory Commission (FERC) under CGT's blanket automatic authorization [18 CFR 157.208(a)]. Construction activities are scheduled to begin in first quarter of 2024 and are expected to be completed within one day.

Ground disturbing activities will occur on three existing CGT pipelines within a cultivated agricultural field and will include excavation to a maximum depth of 10 feet to expose the existing pipeline; replace the segment of pipe; backfill the excavated soil; returning grade to pre-construction elevations; and seeding, as required. CGT will use about 6.40 acres of temporary workspace (outside the existing maintained easement) for materials and equipment storage and fabrication.

The three new segments of pipe will be hydrostatically tested using about 94,680 gallons of municipal water, which will be completed in about 4 to 8 hours. After the hydrostatic test is complete, the pipelines will be depressurized, and the water will be discharged within the temporary workspace into a well-vegetated, upland area. The test water will be discharged into a dewatering structure (see Attachment B) and will be monitored to verify that discharge rates and sediment loads do not exceed the capacity of the dewatering structure. The discharge rate and volume will be monitored with a flow meter or estimated by suitable means. At no time will the discharge rate or volume exceed the capacity of the dewatering device. The hydrostatic test water discharge will adhere to the FERC's *Wetland and Waterbody*



*Construction and Mitigation Procedures*<sup>1</sup> and *Upland Erosion, Revegetation, and Maintenance Plan*<sup>2</sup> and monitoring/reporting will adhere to General Permit MSG13 conditions.

If you have any questions or require additional information, please contact me at 832-244-5257 or by email at [jackson\\_lamb@tcenergy.com](mailto:jackson_lamb@tcenergy.com); or contact Nate Cirillo of Merjent at 262-370-8554 or by email at [Nate.cirillo@merjent.com](mailto:Nate.cirillo@merjent.com).

Sincerely,

A handwritten signature in black ink that reads "Jackson Lamb".

Jackson Lamb  
Environmental Specialist  
US Environment

Attachment A - Maps  
Attachment B - Typical Energy Dissipation Devices  
Attachment C - General Permit Request for Coverage

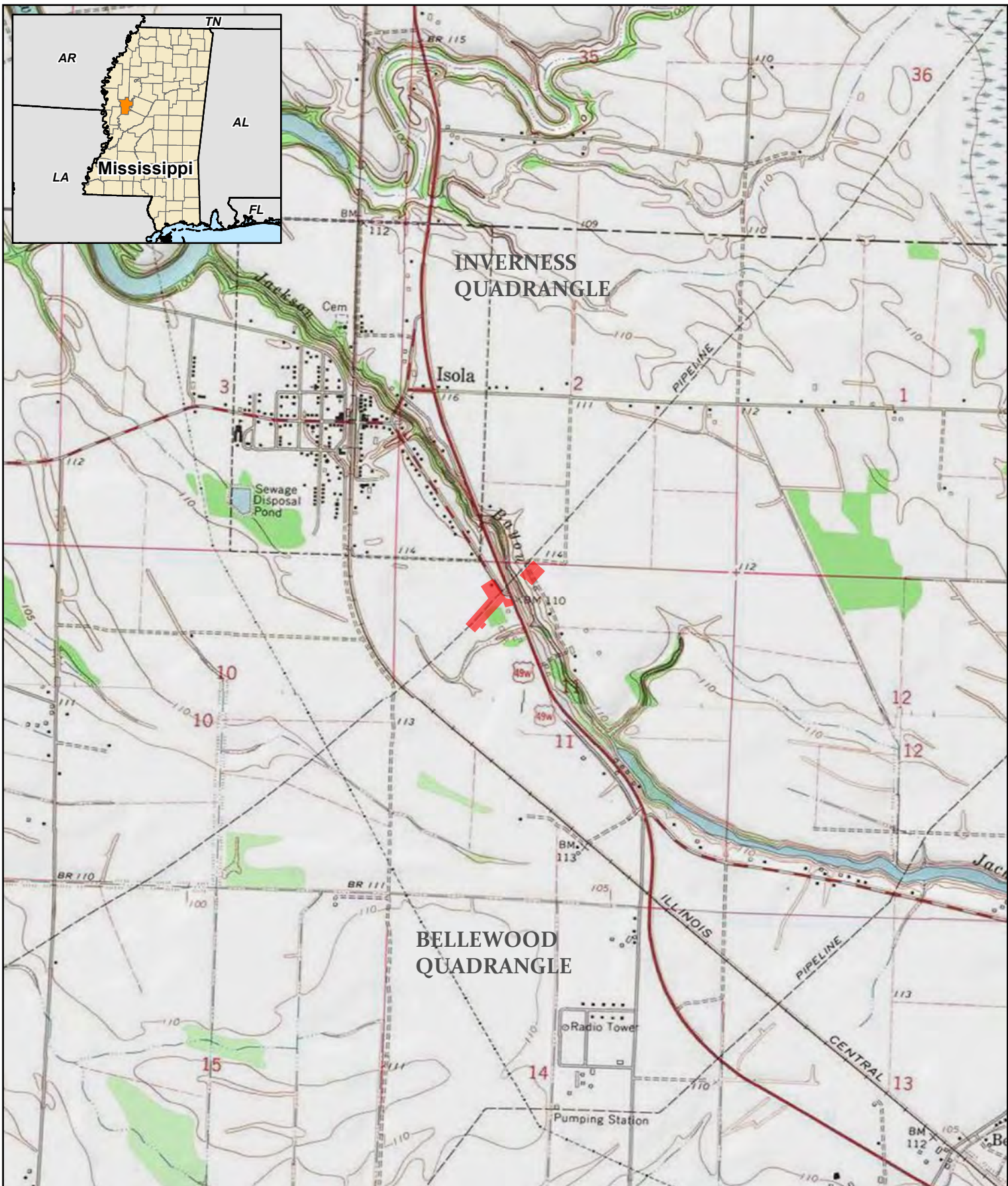
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<sup>1</sup> Federal Energy Regulatory Commission. *Upland Erosion Control, Revegetation, and Maintenance Plan*. May 2013. <https://ferc.gov/sites/default/files/2020-04/upland-erosion-control-revegetation-maintenance-plan.pdf>.

<sup>2</sup> Federal Energy Regulatory Commission. *Wetland and Waterbody Construction and Mitigation Procedures*. May 2013. <https://www.ferc.gov/sites/default/files/2020-04/wetland-waterbody-construction-mitigation-procedures.pdf>.



# Attachment A Maps



0 1,000 2,000  
Feet




1 inch = 2,000 feet

For Environmental Review Purposes Only

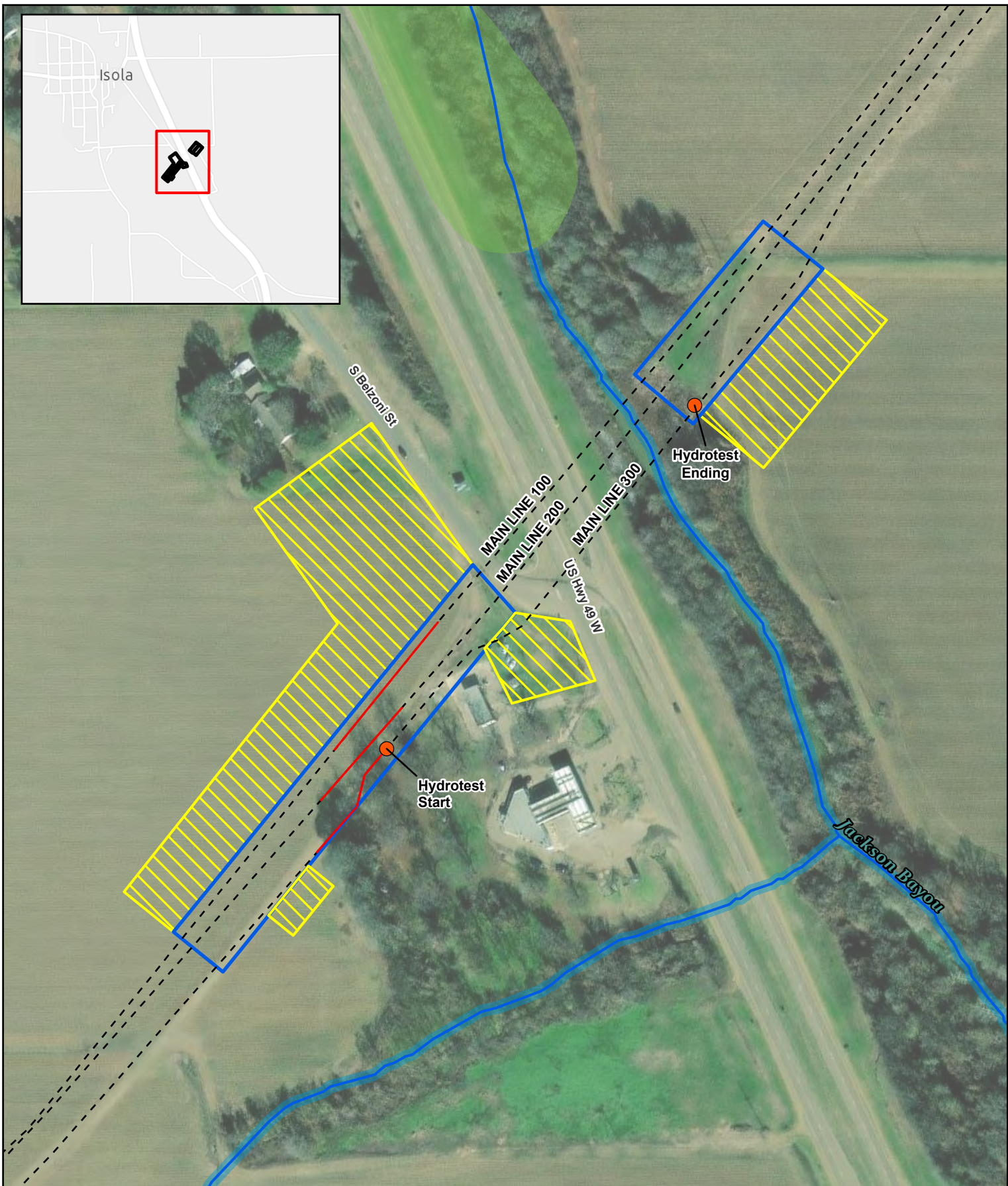
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**7.5 minute USGS Topographic Map**  
**TC Energy - Columbia Gulf Transmission**  
**Double Quick Pipe Replacements and Hydrotest Project**  
**Humphreys County, Mississippi**

 Construction Work Area

Quadrangle: Inverness, KY

Date: (10/26/2023) Source: Z:\Clients\01\TransCanada\Columbia\_Gas\_Transmission\02\Permitting\StateHydrotest\_Permit\Figures.aprx



0 100 200  
Feet

1 inch = 200 feet

For Environmental Review Purposes Only



## Aerial TC Energy - Columbia Gulf Transmission Double Quick Pipe Replacements and Hydrotest Project Humphreys County, Mississippi

- Hydrotest Discharge Location
- - - Existing Pipeline
- Pipe Replacement
- Permanent Easement Workspace
- Temporary Workspace
- - - Existing Pipeline
- NHD Waterway
- NWI Wetlands
- Marsh, Swamp, Bog, Prairie
- River

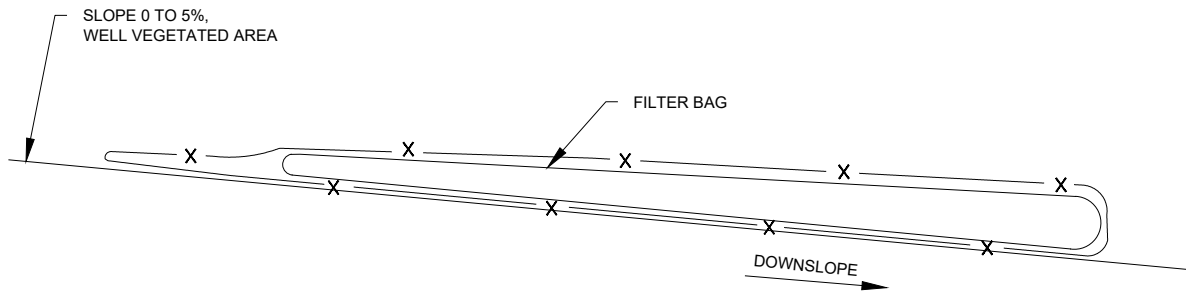
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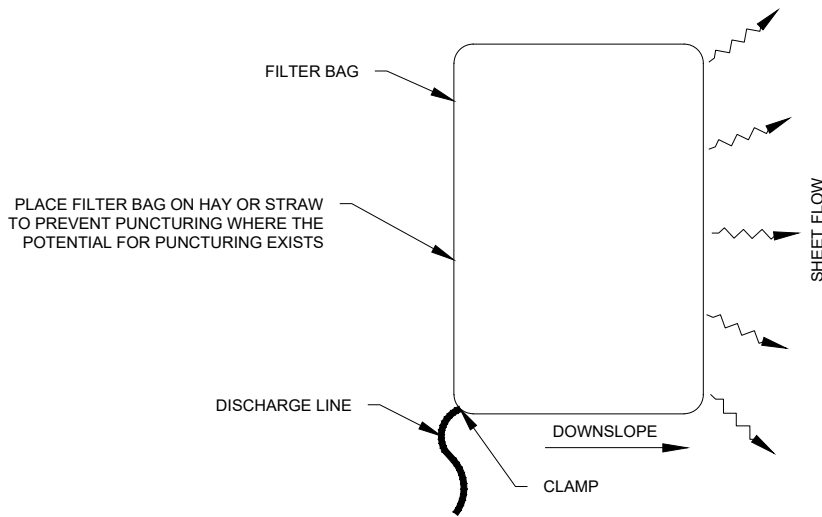


# Attachment B

## Typical Energy Dissipation Devices



**SECTION**



**PLAN**

**NOTES:**

1. MANUFACTURED NON-WOVEN (FELT) FILTER BAGS ARE A SUITABLE ALTERNATIVE TO STRAW BALE STRUCTURES FOR TRENCH DEWATERING. FILTER BAGS SHALL BE INSTALLED AS SPECIFIED BY THE MANUFACTURER.
2. INSTALLATION SPECIFICATIONS TO BE MODIFIED AS NECESSARY TO SUIT ACTUAL SITE CONDITIONS.
3. THE PUMP DISCHARGE HOSE SHALL BE INSERTED INTO THE BAGS IN THE MANNER SPECIFIED BY THE MANUFACTURER AND SECURELY CLAMPED. ONLY ONE PUMP DISCHARGE HOSE SHOULD BE USED PER BAG UNLESS BAG IS SPECIFICALLY MANUFACTURED TO ACCEPT MORE THAN ONE.
4. DO NOT ALTER OR CUT BAGS.
5. BAGS MAY BE PLACED OUTSIDE THE CONST. WORK AREA WITH EQUIPMENT PROVIDED THE EQUIPMENT REMAINS INSIDE THE CONST. WORK AREA.
6. BAGS WILL BE REPLACED WHEN THEY BECOME 1/2 FULL OF SEDIMENT.
7. ADDITIONAL SEDIMENT AND EROSION CONTROLS MAY NEED TO BE INSTALLED AROUND THE FILTER BAG, AS APPROPRIATE, AND APPROVED BY THE ENVIRONMENTAL INSPECTOR.

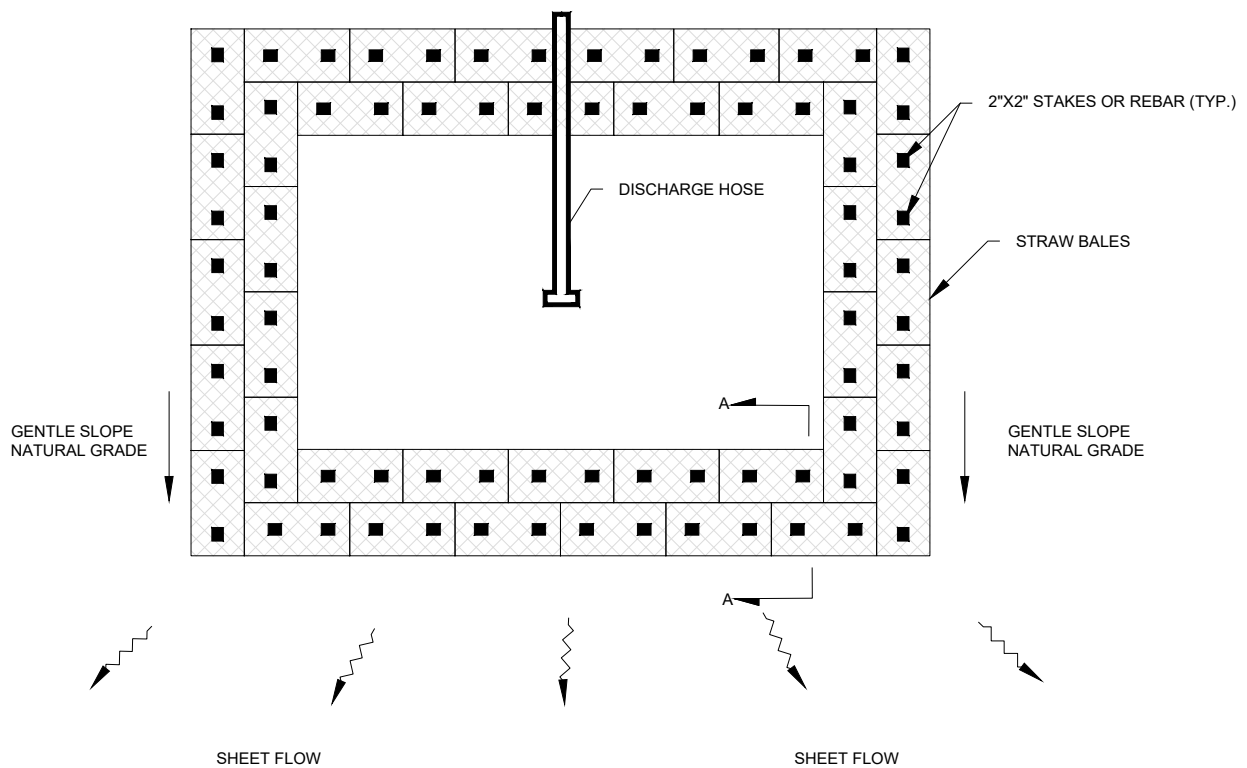
NOT TO SCALE



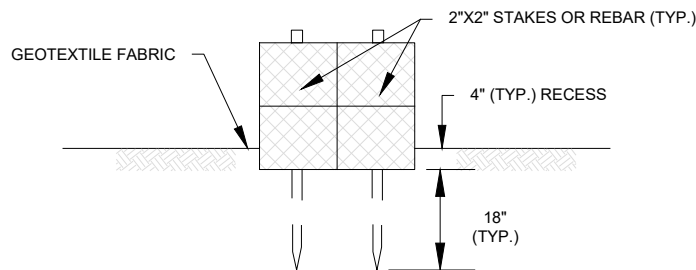
ENVIRONMENTAL CONSTRUCTION STANDARDS

TYPICAL DEWATERING FILTER BAG

FIGURE NO. 16



**PLAN**



**SECTION "A-A"**

**NOTES:**

1. INSTALL A STRAW BALE DEWATERING STRUCTURE WHENEVER IT IS NECESSARY AND AS DIRECTED BY THE ENVIRONMENTAL INSPECTOR TO PREVENT THE FLOW OF SILT LADEN WATER INTO WATER BODIES OR WETLANDS.
2. DISCHARGE SITE SHOULD BE WELL VEGETATED AND LOCATED AWAY FROM ANY WATER BODY. THE TOPOGRAPHY OF THE SITE SHOULD BE SUCH THAT WATER WILL FLOW INTO THE DEWATERING STRUCTURE AND AWAY FROM ANY WORK AREAS. THE AREA DOWNSLOPE FROM THE DEWATERING SITE MUST BE REASONABLY FLAT OR STABILIZED BY VEGETATION OR OTHER MEANS TO ALLOW THE FILTERED WATER TO CONTINUE AS SHEET FLOW.
3. DISCHARGE RATES SHOULD BE SUCH THAT THE CAPACITY OF THE STRUCTURE WILL NOT BE EXCEEDED.
4. DISCHARGED WATER SHALL BE FORCED INTO SHEET FLOW IMMEDIATELY BEYOND THE SPILL PAD USING A COMBINATION OF STRAW BALES AND THE NATURAL TOPOGRAPHY. RECESS STRAW BALES. DRIVE TWO (2) STAKES OR REBAR INTO EACH BALE TO ANCHOR THEM IN PLACE.
5. A FILTER BAG MAY ALSO BE UTILIZED INSIDE THE DEWATERING STRUCTURE TO HELP FILTER THE DISCHARGE.
6. INSTALLATION SPECIFICATIONS TO BE MODIFIED AS NECESSARY TO SUIT ACTUAL SITE CONDITIONS.
7. ADDITIONAL SEDIMENT AND EROSION CONTROLS MAY NEED TO BE INSTALLED AROUND THE FILTER BAG AS APPROPRIATE, AND APPROVED BY THE ENVIRONMENTAL INSPECTOR.

NOT TO SCALE

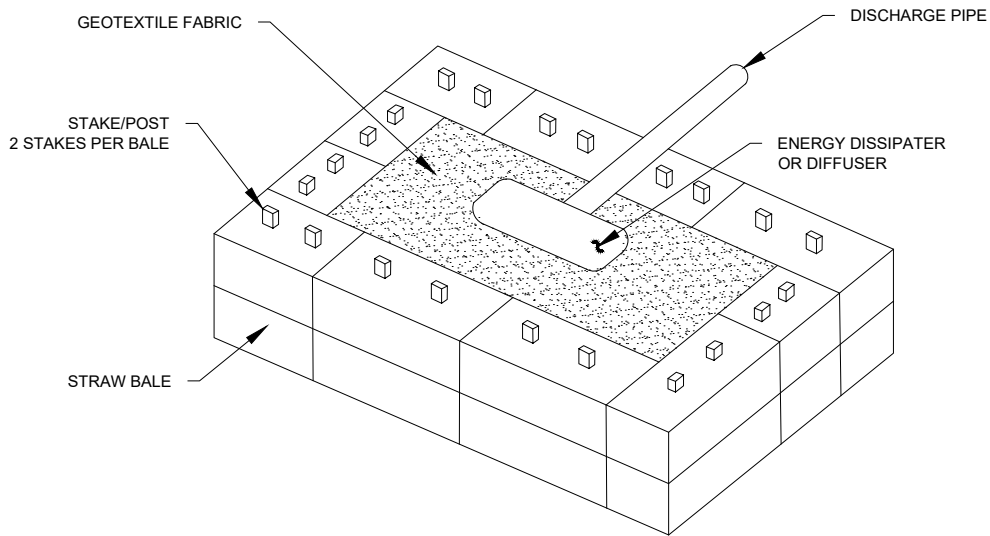


ENVIRONMENTAL CONSTRUCTION STANDARDS

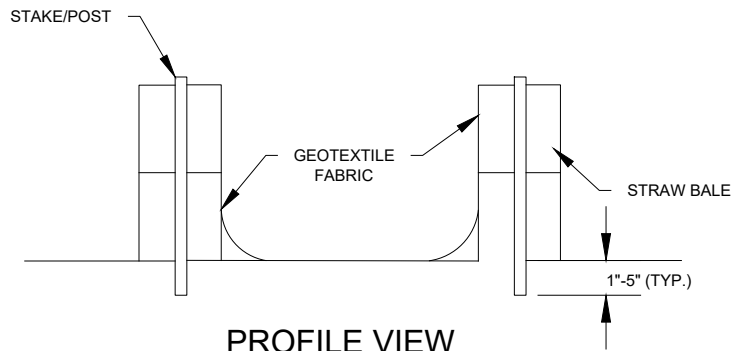
TYPICAL STRAW BALE DEWATERING STRUCTURE

FIGURE NO. 17





**ISOMETRIC VIEW**  
NOT TO SCALE



**PROFILE VIEW**  
NOT TO SCALE

**NOTES:**

1. ALL DEWATERING ACTIVITIES WILL BE CONDUCTED IN ACCORDANCE WITH PERMIT CONDITIONS.
2. DISCHARGE SITE SHOULD BE WELL VEGETATED, WHERE POSSIBLE, AND LOCATED AT LEAST 50FT FROM ANY WATER BODY. THE TOPOGRAPHY OF THE SITE SHOULD BE SUCH THAT WATER WILL FLOW INTO THE DEWATERING STRUCTURE AND AWAY FROM ANY WORK AREAS.
3. DIRECT THE PUMPED WATER ONTO A STABLE SPILL PAD CONSTRUCTED OF STRAW BALES OR GEOTEXTILE FABRIC STAKED TO THE GROUND SURFACE.
4. DISCHARGE RATES SHOULD BE SUCH THAT THE STRUCTURE WILL NOT OVERFLOW.
5. DRIVE 2 (TWO) STAKES OR POSTS INTO EACH BALE TO ANCHOR THEM IN PLACE.
6. FILTER BAGS ARE A SUITABLE ALTERNATIVE TO STRAW BALE STRUCTURES FOR TRENCH DEWATERING. STRAW BALES OR FILTER SOCK CAN BE ADDED AROUND THE FILTER BAG TO PROVIDE ADDITIONAL SEDIMENT CONTROL WHERE NEEDED.
7. STAKES OR POSTS SHOULD BE 2"X2" WOOD OR SUITABLE ALTERNATIVE.
8. SIZE OF DEWATERING STRUCTURE WILL BE DETERMINED BASED ON VOLUME OF DISCHARGE.

NOT TO SCALE



ENVIRONMENTAL CONSTRUCTION STANDARDS

HYDROSTATIC TEST  
DEWATERING PIT

FIGURE  
NO. 18



# Attachment C

## General Permit Request for Coverage

AI: 85270

Coverage #:  
MSG130636



Rec'd via email:  
10/27/2023

# HYDROSTATIC TEST NOTICE OF INTENT (HTNOI)

## FOR COVERAGE UNDER MISSISSIPPI'S HYDROSTATIC TEST GENERAL PERMIT

GENERAL PERMIT MSG130636

(Number to be assigned by MDEQ)

### INSTRUCTIONS

The Hydrostatic Test Notice of Intent (HTNOI) is for coverage under the Hydrostatic Test General Permit to discharge hydrostatic test water. Applicant must be the owner or operator. The coverage recipient is responsible for compliance with the conditions of the general permit.

Completed HTNOIs should be filed at least thirty (30) days prior to the commencement of regulated activity. Discharge of hydrostatic test water without written notification of coverage is a violation of state law.

If the company seeking coverage is a corporation, a limited liability company, a partnership, or a business trust, attach proof of its registration with the Mississippi Secretary of State and /or its Certificate of Good Standing. This registration or Certificate of Good Standing must be dated within twelve (12) months of the date of the submittal of this coverage form. Coverage will be issued in the company name as it is registered with the Mississippi Secretary of State.

IF REGULATED LAND DISTURBING ACTIVITIES ARE TO OCCUR, LIST ACRES DISTURBED: \_\_\_\_\_

NOTE: If disturbing five (5) acres or more, a stormwater construction coverage is required.

A USGS quadrangle map or copy is a required submittal. The map shall extend at least one-half of a mile beyond the facility/ project property boundary. In the case of linear pipeline projects the map shall extend at least one-half of a mile beyond the pipeline right-of-way. The site location and outfalls must be outlined and labeled. Quad maps can be obtained from the Office of Geology (601-961-5523). If a copy is submitted, provide the name of the quadrangle map that is found in upper right hand corner.

Additional submittals may include the following:

- Labeled site drawing noting the outfall(s) associated with hydrostatic test water discharge(s)
- List of chemical Additives,
- Appropriate Section 404 documentation from U.S. Army Corps of Engineers, or
- Written authorization from the MDEQ, Office of Land and Water, if water withdrawal from surface waters or ground waters is to be used for the testing. For information call the Office of Land and Water at 601/961-5202

**ALL REQUESTED INFORMATION MUST BE PROVIDED** (Answer "NA" if not applicable)

APPLICANT IS THE:  OWNER  OPERATOR (Must check one or both)

### OWNER INFORMATION

OWNER CONTACT NAME & POSITION: \_\_\_\_\_

OWNER EMAIL ADDRESS: \_\_\_\_\_

OWNER COMPANY NAME: \_\_\_\_\_

OWNER STREET (P.O. BOX): \_\_\_\_\_

OWNER CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_

OWNER PHONE # (INCLUDE AREA CODE): \_\_\_\_\_

**OPERATOR INFORMATION**

OPERATOR CONTACT NAME & POSITION: \_\_\_\_\_

OPERATOR EMAIL: \_\_\_\_\_

OPERATOR COMPANY: \_\_\_\_\_

OPERATOR STREET (P.O. BOX): \_\_\_\_\_

OPERATOR CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_

OPERATOR PHONE # (INCLUDE AREA CODE): \_\_\_\_\_

**FACILITY/PROJECT INFORMATION**

FACILITY/PROJECT NAME: \_\_\_\_\_

PIPELINE, STORAGE TANK OR FLOWLINE BEING TESTED IS:  NEW  USED

IF USED, LIST PRIOR MATERIAL SERVICE OF EQUIPMENT: \_\_\_\_\_

PHYSICAL SITE ADDRESS (If not available, indicate nearest named road. Linear projects indicate beginning of project):

STREET: \_\_\_\_\_ CITY: \_\_\_\_\_

COUNTY: \_\_\_\_\_ ZIP: \_\_\_\_\_

Facility site tribal land ID (NA if not applicable) \_\_\_\_\_

TYPE OF TREATMENT (IF PROVIDED): \_\_\_\_\_

SIC Code \_ \_ \_ \_ \_ NAICS Code \_ \_ \_ \_ \_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and/or imprisonment for knowing violations.



\_\_\_\_\_  
Signature<sup>1</sup> (Must be signed by operator when different than owner)

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

<sup>1</sup>This application shall be signed according to ACT6, T-17 of the General Permit, as follows:

- For a corporation, by a responsible corporate officer.
- For a partnership, by a general partner.
- For a sole proprietorship, by the proprietor.
- For a municipal, state or other public facility, by principal executive officer, the mayor, or ranking elected official.

HTNOI forms must be submitted to: **Chief, Environmental Permits Division**  
**MS Dept of Environmental Quality, Office of Pollution Control**  
**P.O. Box 2261**  
**Jackson, Mississippi 39225**

## OUTFALL INFORMATION

(To be submitted with HTNOI and Major Modification Forms)

### INSTRUCTIONS:

1. For each outfall, complete the information in the table below (NOTE: Complete the last column of this form, only if it is being submitted with a Major Modification Form).
2. All outfalls must be spotted and labeled on a USGS quadrangle map.

OUTFALL NO.	LATITUDE <sup>1</sup> (deg/min/sec)	LONGITUDE <sup>1</sup> (deg/min/sec)	SOURCE OF FILL WATER	NEAREST RECEIVING STREAM <sup>2</sup>				EST. TOTAL DISCHARGE (MIL GAL)	STATUS OF TANK, PIPELINE, FLOWLINE ETC.		EXPECTED TEST DATE(S) (mm/dd/yr)	INDICATE WHETHER OUTFALL IS NEW OF EXISTING	
				NAME	ON MDEQ 303(D) LIST? <sup>3</sup>		HAS TMDL? <sup>3</sup>		New	Used			
					Yes	No	Yes						No
001													
002													
003													
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012													

Revised: 03/15/17

**NOTE:** To Comply with EPA's NPDES e-Reporting rule, MDEQ has implemented the use of U.S.EPA's NetDMR for the submittal of DMRs. Permittees required to submit DMRs must submit DMRs electronically using NetDMR. A training video and additional info can be found at <http://bit.ly/2gao6sW>. For additional information about NetDMR, please send an email to [netdmrhelp@mdeq.ms.gov](mailto:netdmrhelp@mdeq.ms.gov) or contact Annette Brocks at 601-961-5252

<sup>1</sup> List the latitude and longitude of its location to the nearest 15 seconds.

<sup>2</sup> Name of the nearest named receiving stream as listed on a USGS Quad Map.

<sup>3</sup> MDEQ's 303(d) List of Impaired Water Bodies and approved TMDLs can be found at: [http://www.deq.state.ms.us/MDEQ.nsf/page/TWB\\_Total\\_Maximum\\_Daily\\_Load\\_Section](http://www.deq.state.ms.us/MDEQ.nsf/page/TWB_Total_Maximum_Daily_Load_Section)