

in this area in order to avoid impacts to the riparian band along the river.

iii. *Possible Conflicts Between the Dos Laredos Pipeline and the Objectives of Federal, Regional, State and Local Use Plans, Policies and Controls for the Area Concerned:* The risks posed by the Dos Laredos Pipeline do not conflict with any local land use plans, policies, or controls.

iv. *Probable Adverse Environmental Effects Which Cannot Be Avoided:*

There will be a long-term increase in health and safety risk in the immediate vicinity of the pipeline due to the nature of the product being transported, which represents a shifting of risk from other portions of the county that would handle substantial truck transport of product under the "No Action" alternative or the alternative alignment scenarios. Any potential impacts would be mitigated by the measures described below, which are proposed to prevent or mitigate potentially adverse environmental impacts and which Valero intends to take.

v. *Cumulative Effects:* There are two important considerations with respect to the cumulative impacts analysis for the Dos Laredos Pipeline. The first is the cumulative effect of risks to the pipeline, and correspondingly to those living or working near to the pipeline, due to potential accidents on other pipelines in the vicinity. The only major transmission line in the vicinity of the Dos Laredos Pipeline is the Duke Energy Pipeline, which shares a common right-of-way for a ¼ mile stretch of the proposed alignment just north of FM 1472. The second is the cumulative effect of the increased overall risk to surrounding populations from an industrial accident occurring along the right-of-way that results in the release of LPG from the Dos Laredos pipeline, industrial sources or both.

A study of U.S. DOT databases has not revealed any cases where a below ground pipeline has ruptured due to the effects of another accidental release, fire, or explosion of a nearby buried pipeline. No portions of the Dos Laredos pipeline will be above ground in the vicinity of any exposed portions of the Duke Energy pipeline. Therefore the proximity to the Duke Energy pipeline is not considered a significant cumulative impact.

Over much of the alignment there are no heavy industrial activities, particularly those involving hazardous liquids or gases, that would create a cumulative impact in combination with the Dos Laredos Pipeline. The Valero Laredo terminal at the north end of the alignment is situated in an industrialized area, along the railroad

and I-35, and has storage tanks for gasoline. No storage of LPG will take place at this facility at this time. The industrial park along FM 1472 which will border a portion of the alignment appears to be dedicated to warehousing and transportation, and there are no current plans to incorporate any heavy industrial uses in the area. These factors all lead to a no significant cumulative impacts assessment.

C. Environmental Justice/Socio-Economic Concerns

The environmental justice assessment for this project analyzed the impact of the potential human, health, socioeconomic, and environmental effects of the Dos Laredos pipeline on minority and low-income populations. The population of Webb County is heavily minority, with dense population areas of the county around Laredo containing a higher percentages of minorities. To the extent that minority and low-income populations reside in the vicinity of the pipeline, they risk exposure to the insignificant, temporary and/or minor potential human health and environmental effects that are discussed in detail in the Final Environmental Assessment and summarized above. These include temporary, minor construction related noise and threats to human safety due to fire or accidental product release.

These risks, however, must be weighed against the benefits that would result from the removal of tanker trucks as the primary mode of LPG transportation. The removal of tanker trucks from roads, particularly border crossings, will increase safety at these highly sensitive locations and route LPG away from more populous areas of town while in transit. Emissions of hazardous air pollutants during LPG transfer operations within the Laredo-Nuevo Laredo airshed will be reduced. It is also worth noting that due to the overall makeup of the Laredo metropolitan area, all of the alternatives for consideration, including the "no-action" alternative of tanker truck transport of LPG, will impact primarily low-income and minority populations. There is no evidence to suggest that minority or low-income populations will experience disproportionate adverse impacts as a result of the construction and operation of the Dos Laredos Pipeline. To the contrary, since most of the Dos Laredos Pipeline is situated away from areas where human health and safety could be adversely impacted, while truck transport necessarily takes place in areas where human health and safety are at risk, the pipeline will result in lower risks to the health and safety of

minority and low-income populations than the "no-action" alternative.

IV. Prevention and Mitigation Measures

In order to control risks associated with outside force, damage, corrosion and leaks, Valero has undertaken or intends to undertake the prevention and mitigation measures listed below. Valero has or will:

- Bury the pipeline a minimum of 3 feet below grade.
- Place and maintain prominent warning markers at all crossings and property lines along the pipeline.
- Participate in all applicable one-call notification systems and coordinate with the local emergency planning committee.
- Conduct regular ROW drive-overs or over flights in order to identify potential pipeline encroachments and unauthorized activities.
- Ensure that a Valero representative is physically present anytime there is construction activity within the pipeline right of way.
- Participate in on-going public education initiatives stressing pipeline safety and damage prevention.
- Use factory-applied fusion-bonded epoxy coating on all pipes.
- Use field applied coating on all welded joints.
- Conduct biennial surveys to determine effectiveness of corrosion control.
- Use a certified impressed current cathodic protection system.
- Use a heavy wall pipe in lieu of cased crossings.
- Use high resolution internal inspection tools (*i.e.*, pigs) at least every five years
- X-ray all girth welds completely.
- Use pipe manufactured at an ISO 9000-certified mill;
- Hydro test pipe in place to 125% of its maximum allowable operating pressure for 8 hours.
- Require that material specification, design, and construction meet or exceed all applicable standards and codes established by API, ASME, DOT/OPS, and TRC.
- Perform comprehensive construction and installation inspection.
- Provide continuous 24-hour monitoring of the Dos Laredos Pipeline from a dispatch and control center.
- Use computers to identify significant operational deviations, and to set-off appropriate alarms.
- Monitor remotely the pressure at the Rio Grande River.
- Provide on-going training and performance certification of employees responsible for pipeline operations and maintenance, as required by the