



Ohio Valley Environmental Coalition

Supporting Organized Voices and Empowered Communities Since 1987

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Roy F. Kees, P.E.
WV DEP Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
FAX: 304/926-0478

RE: Public Notice for Draft Permit R13-3277 for Mountain Valley Pipeline, LLC's Stallworth Natural Gas Compressor Station located in Fayette County.

Dr. Mr. Kees:

Please accept these written comments from the Ohio Valley Environmental Coalition regarding Draft Permit R13-3277. Due to the impacts this compressor station could have, if built in Fayette County, we strongly urge that DEP DAQ hold a public meeting about this permit to answer questions from the public.

We detail below some of our concerns about this draft permit. We feel the public deserves a chance to ask questions and hear answers from DEP at a public meeting.

The PA DEP has published information stating that emissions from two compressor stations (Stewart and Energy Corps) include: MTBE, CO, iso-Butane, methyl mercaptan, n-Butane, n-hexane, n-octane, nitrogen dioxide, nitrousacidstyrene, 2-methyl butane, 2 methyl pentane, 3 methyl pentane, ethyl benzene, benzene, ethane, propane, methanol and naphthlele. Other state's comparable agencies have reported similar emissions, and more, including toluene. You can understand why the public deserves to learn as much as possible about the impacts of this proposed facility before and permit is granted, given the toxic and carcinogenic nature of these emissions.¹

We are worried about potential emissions impacts of ultrafine particulate matter; what monitoring equipment and mechanisms would be in place for ultrafine particulate matter? According to recent studies, ultrafine particulate matter increases human health risks for cardiovascular and respiratory disease as well as damage to the nervous system.²

What is the track record of the contractors who would be engaged to build this facility? How can the public be assured that DEP will have adequate inspectors on the ground to ensure that this facility is complying with its permit?

Should the air emission permit limits (which DEP says, according to a preliminary evaluation of the proposed facility, will meet all State and Federal air quality requirements) be reexamined in light of

¹ <http://www.environmentalhealthproject.org/wp-content/uploads/2012/03/Compressor-station-emissions-and-health-impacts-02.24.2015.pdf>

² <http://wvpublic.org/post/wvu-researcher-warns-about-toxic-ultrafine-dust-wva>

research showing emissions from compressor stations can double the risk of newborn autism and increase the chance of asthma and respiratory problems for people living nearby?³

What will happen should the facility exceed permit limits, both in terms of punishment for violations for the company, and, more importantly, in terms of impacts on human health?

What has DEP done to consider cumulative impacts of other nearby sources of air pollution?

What methods will be used to capture gas released that would occur from this facility, should it become operational, during blow downs or maintenance processes?

What are the results of any detailed air quality baseline testing has DEP has conducted in the immediate area surrounding the proposed compressor station site? If DEP has not conducted any detailed air quality testing at the proposed site, we urged DEP to carry out this baseline testing prior to the issuance of any permit and prior to any construction.

Will nearby residents be totally assured—in writing, by the DEP DAQ, as well as the compressor station operators—that there will be no measurable or discernable deterioration to their current air quality or noise pollution levels?

Will the compressor station be manned 24/7 with a trained operator capable of responding to any upset, accurately assessing the potential danger or problem and able to implement prompt corrective actions? If the station will not have experienced personnel on duty on site 24/7, then will there be an integrated, comprehensive system of monitoring instruments on all relevant variables, designed to activate appropriate fail-safe control systems circuits?

What measures will be taken to guarantee that the overall noise level will not interfere with nearby residents or business owners' daily lives and functions? We have heard of people living near compressors stations reporting an intolerable change in their way of life and health due to noise and air pollution. People living in Fayette County deserve to have their concerns heard during a public meeting on Draft Permit R13-3277.

OVEC would remind DAQ of its own proclamation, “ We strive to ensure that economic growth will occur in harmony with the preservation of existing clean air resources; to prevent the development of any new nonattainment problems; to protect the public health and welfare from any adverse effects which might occur even at air quality levels better than the West Virginia and National Ambient Air Quality Standards; and, to preserve, protect and enhance the air quality in areas of special natural, recreational, scenic and/or historic value.”

Thank you for your attention,

Vivian Stockman, OVEC project coordinator

³<http://www.environmentalhealthproject.org/wp-content/uploads/2015/06/Summary-of-Minisink-Results.Public.pdf>