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## Ohio Valley Environmental Coalition

Supporting Organized Voices and Empowered Communities Since 1987

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Jerry Williams, P.E.

WV Department of Environmental Protection

Division of Air Quality

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RE: Public Notices for:

Draft Permit R13-3313 for Columbia Gas Transmission, LLC's Sherwood Compressor Station and Draft Permit R13-3314 for Columbia Gas Transmission, LLC's Mount Olive Compressor Station and Draft Permit R13-3315 for Columbia Gas Transmission, LLC's White Oak Compressor Station

Dr. Mr. Williams:

Please accept these written comments from the Ohio Valley Environmental Coalition regarding Draft Permits R13-3313, Draft Permit R13-3314, and Draft Permit R13-3315.

**Due to the impacts these compressor stations could have on nearby communities, we strongly urge that DEP DAQ hold public meeting about each of these permits to answer questions from the public. We urge that the meetings be held in a convenient location for each affected community, and that public notice of the meetings be issued with at least two weeks.**

Given the number of permits associated with deep shale "development" that are up for comment at this time, an extension of the comment periods for these particular permits would be very helpful.

Below, we detail below some of our concerns about these draft permits. We feel the public deserves a chance to ask questions and hear answers from DEP at public meetings.

We are intentional in submitting comments and public hearing requests for all three proposed compressors stations in one letter: these compressors stations are part of one proposed project (the Mountain Xpress Pipeline, MXP). These proposed compressors stations should be considered together, as per the "aggregation" requirements of the Clean Air Act. The MXP would be welded together into a single project. A single compressor station serves has no utility unless the whole pipeline project works as a unit.

In addition, the air emissions from these three compressor stations, if built, will have a cumulative impact on our region's air quality and must *not* be considered as *individual* new sources of air pollution.

The construction of this project (which includes the three compressor stations in question) would lock our region into fossil fuel extraction and use and thus would lock us in to more greenhouse gas emissions and thus

subject us to an even greater likelihood of extremely dangerous climate disruptions. Given that the Federal Energy Regulatory Commission (FERC) must ultimately sign off on this project, is this then a project that would fall under the new White House recommendations that federal agencies consider climate change when conducting project reviews? Should not the DEP be considering climate change as it reviews projects?

While the permits in question here are air permits, the construction of this project (which includes the three compressor stations in question) would nevertheless lock our region into fossil fuel extraction, which would lock us into the high water usage associated with deep shale extraction as well as the liquid waste disposal problems (including earthquakes and radioactive leachate). Waste “water” can produce air emissions. Will the DEP consider these in evaluating the permits?

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 states’ 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 any permit is granted, given the toxic and carcinogenic nature of these emissions.<sup>1</sup>

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.<sup>2</sup>

What is the track record of the contractors who would be engaged to build these facilities? 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 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?<sup>3</sup>

Will the proposed compressor stations, if built, be required to install the latest technology available in terms of fugitive emission detection systems, or will they be monitored with FLIR camera technology on a regular basis? Given the EPA’s proposed new methane emission rules, one or both means of monitoring fugitive emissions should be required.

What will happen should these facilities 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?

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

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

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

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

What are the results of any detailed air quality baseline testing DEP has conducted in the immediate area surrounding these proposed compressor station sites? If DEP has not conducted any detailed air quality testing at the proposed sites, we urge 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 stations' operators—that there will be no measurable or discernable deterioration to their current air quality or noise pollution levels?

Will the compressor stations 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 stations 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 near these proposed compressor stations deserve to have their concerns heard during public meetings on the draft permits.

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