Moritz, Brigette

From: Paula Clair <pclair3@aol.com>
Sent: Thursday, September 03, 2015 2:01 AM
To: Mccarthy, Gina
Cc: Enck, Judith
Subject: Petition on Title V Air Permits for the Southeast and Stony Point Compressor Stations - Algonquin Incremental Market Project
Attachments: Spectra Energy Resource Report 12 PCB Regulation Due to More Than 50 Parts Per Milliom.docx; PCBs in Natural Gas Pipelines - Polychlorinated Biphenyl Inspection Manual EPA.docx; TJ Williamson (Manufactuer of PIGS and Pipelines) Slides on Piggability Operation Excerpts Contaminants Highlighted.docx; Pipeline Integrity Mgt Period 9 & 10 Difficult to Pig Pipelines.pdf; Investigating Links between Shale Gas Development and Health Impacts Through a Community Survey Project in Pennsylvania.docx; Carpenter_Study_Air_Emissions_VOCs_2014 highlighted.pdf; Developmental and reproductive effects chemicals unconvental oil and gas.docx; Health Effects National Institutes of health.docx; Algonquin_Incremental_Market_Project__2 AIM_Project)_Wilma_Subra Fewer Pages Excerpts.ppt; Los Angeles Times Spectra $15 million fine $400 million clean-up.docx; Spectra Energy (Texas Eastern) Final Order_12212012.pdf; Southwest Pennsylvania Environmental Health Project.pdf

U.S. EPA Administrator Gina McCarthy
U.S. Environmental Protection Agency
Office of Administrator
Mail Code 1101A
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Re: Application ID: 3-3730-00060/00013 – Air Title V – Southeast Compressor Station
Application ID: 3-3928-00001/00027 – Air Title V – Stony Point Compressor Station

Dear Administrator McCarthy:

Below is my petition to the United States Environmental Protection Agency regarding the proposed Air Permits for the Southeast and Stony Point Compressor Stations in the Algonquin Incremental Market project. Also attached are studies and other documents, as well as two links directly below, referenced in my comments. Thank you.
Paula Clair
162 Gallows Hill Road
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Minisink Poisoning for Profit
https://www.youtube.com/watch?v=utyE0rtZRs8
http://primis.phmsa.dot.gov/comm/reports/enforce/NOPV_opid_0.html#_TP_1_tab_5

As per Regulation 6 NYCRR, 211.1, "No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic, or duration which are injurious to human, plant, or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards, or emission limits, this prohibition applies, but is not limited to any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others."
The Algonquin Incremental Market (AIM) project violates Regulation 6 NYCRR 211.1, as follows:

Compressor Stations emit toxic chemicals in sufficient quantity to be directly linked to adverse health effects in humans. Attached are two studies - one by Gregg P Macey, Ruth Breech, Mark Chernaik, Caroline Cox, Denny Larson, Deb Thomas and David O Carpenter entitled Air concentrations of volatile compounds near oil and gas production: a community-based , exploratory study, which studies the effects of compressor station air, as well as that of other gas production facilities. I have highlighted sections on compressor stations. The study found higher levels of benzene, formaldehyde and hexane near compressor stations. These are all dangerous toxins. Benzene is a known carcinogen. Formaldehyde is a suspected carcinogen that can affect every tissue in the human body, and acute exposure to hexane

affects the central nervous system, causing dizziness nausea and headache. Chronic effects of hexane include neurotoxicity.

The second study is by * Ellen Webb, Sheila Bushkin-Bedient*, Amanda Cheng, Christopher D. Kassotis, Victoria Balise and Susan C. Nagel entitled Developmental and reproductive effects of chemicals associated with unconventional oil and natural gas operations. I have also highlighted sections of this document. This study documents semen quality, menstrual cycle and fecundity problems, as well as miscarriage, still birth, pre-term births, low birth weight, and birth defects as a result of the chemicals emitted from compressor stations and used in other fracking operations.

Also attached is the February 24, 2015 Southeast Pennsylvania Environmental Health Center's Summary on Compressor Stations and Health Impacts. See the following excerpt on Blowdowns

Blowdowns

The largest single emission at a compressor station is the compressor blowdown.[13] They can be scheduled or accidental. As the natural gas rushes through the blowdown valve, a gas plume extends upward of 30 to 60 meters. The most forceful rush of air occurs at the very beginning, then the flow gradually slows down. The first 30 to 60 minutes of the blowdown are the most intense, but the entire blowdown may last up to three hours.[14] One blowdown vents 15 MCf gas to atmosphere on average. Isolation valves leak about 1.4 Mcf/hr on average through open blowdown vents.[15]

Please read the entire report, which focuses on health effects on residents. The report concludes "there is little doubt that there will be times of high levels of contaminants released and these high levels can increase health risks to residents."

Above, I have attached a link to a video documenting adverse health effects and interference with the enjoyment of one's home and property in the New York community of Minisink. Please accept this as anecdotal evidence of harm to New York State residents and their property by compressor stations. It should be noted that the Minisink compressor station is a fraction of the size of either of the the two AIM project compressor station - Southeast and Stony Point.

In addition, Wilma Subra and Nadia Steinzor published a peer-reviewed study on the health effects of compressor stations, which concurs that compressor station emissions caused harm to human health, and documents acute and chronic health effects. See slides 4 and 5 on the Algonquin Incremental Market Power Point by Wilma Subra for Acute and Chronic Effects of compressor station emissions. (Also see Investigating the Links between Shale Gas Development and Health Impacts Through a Community Survey Project in Pennsylvania- attached)

The cumulative effects of the combination and interaction of the emitted toxins from compressor stations, pipelines and pigging stations have not been analyzed. As such these effects are unknown and may lead to increased damage to people, animals and plant life than is known to be inflicted by the individual toxins. This is further compounded by the fact that in the AIM project, the two New York compressor stations are only 26 miles apart, supplemented by the Title V Wheelabrator in Peekskill. Winds carry toxins emitted by each, which could collectively triple the exposure of area human and animal populations as well as plant life. One area should not be subject to so many toxin emitters.

Pigging launcher/receivers are on-site in both compressor station complexes, but are not discussed in the Spectra documents. In addition, pigging stations are built in other areas of the pipeline. One is planned for Stony Street in Yorktown, across the street from a residence and is particularly egregious, because it is also directly adjacent to ball fields where children play.

Pigging Stations clean radioactive materials contained in pipeline scale, including radio-active lead and polonium, (a highly radioactive material), which both result when radon decays into solids. Pigging Station toxins also include PCBs, and other hazardous materials from inside the pipelines. The AIM pipeline carries Marcellus Shale gas, which is known to have very high levels of radon, so the amount of polonium and radioactive lead is greater than pipelines carrying gas from other sources. (You may recall that polonium was used to poison a spy in London several years ago. He died in a short time.) The contaminants in gas pipelines are documented in a TJ Williams Power Point on Pigging. TJ Williams is a manufacturer of PIGS. I have attached the entire Power Point presentation entitled Pipeline Integrity Management and for easy reference, I have also included an excerpt which hones in on contaminants in pipelines entitled TJ Williams (Manufacturer of PIGS).

Contaminants cleaned by PIGS are vented in blowdowns of pipelines and compressor stations, affecting immediate neighbors and a wider population due to wind dispersal of these toxins. As per Resource Report 12 submitted by Spectra Energy to the Federal Energy Regulatory Commission in 2014, Spectra Energy has between 50 and 500 parts per million

of PCBs in its pipelines and thus is monitored by the United States Environmental Protection Administration (EPA). Also see Polychlorinated Biphenyl Inspection Manual, published by the EPA, in the attached file - PCBs in Natural Gas Pipelines.

Regardless of the results of netting and Emission Reduction Credits, Spectra Energy reported to the Federal Energy Regulatory Commission (FERC)on September 29, 2014, that Stony Point and Southeast will collectively emit a potential of 149.7 tons per year (tpy) of Volatile Organic Compounds (VOCS). This is compared with actual emissions of less than 0.05 tpy each of VOCs Spectra reported in October 2013. Rockland, Westchester, and Putnam residents will be breathing this considerable amount of additional carcinogenic toxins in their air.

Potential NOx emissions are listed by Spectra in their reports to FERC for the two compressor stations as 221.7 tpy. This is compared with actual NOx emissions of 60.8 actual tpy Spectra reported in October 2013. Clearly, there is a huge increase in NOx toxins to be breathed by citizens and wildlife.

As per your own agency, the United States Environmental Protection Agency, ground level ozone is created by chemical reactions between oxides of NOx and volatile organic compounds in the presence of sunlight. Both of these toxins are hugely increased by the expansion of this Title V facility by the AIM project in our area. Stony Point and Southeast are non-attainment areas for ground level ozone and fine particulate matter. Spectra Energy's potential to emit (PTE) 221.7 tons of NOx and 149.7 VOCs in these two locations, is in excess of the EPA threshold for PSD and NNSR, even though they are technically under this limit, due to Emission Reduction Credits (ERCs).

This summer had a number of days where the air was unacceptable, and residents were told to limit outdoor activities. More NOx and more volatile organic compounds means more ground level ozone and more health hazards and more environmental damage. This Title V facility should not be relicensed, because it is damaging health, agriculture, and natural resources in our region.

Although Spectra's reports discuss fugitive emissions, there is no reporting of the toxic emissions vented in blowdowns, some of the most dangerous and most highly carcinogenic emissions from this project, which omits them from the total emissions and may therefore erroneously under-report total emissions, which might otherwise take them over limits. To make matters worse, children are most susceptible to these toxins, since their immune systems are still developing and they also have a faster rate of respiration. The elderly and immune-compromised populations are also at greater risk.

It should be noted that Spectra Energy refused to provide the neighboring town of North Salem with advance notice of planned blowdowns. North Salem is just three miles from the compressor station, and its residents would definitely be at risk during blowdowns.

Spectra's safety record is questionable. In 1989, Spectra was fined 15 million dollars for spills in 89 sites. Additional Spectra's clean-up costs for these spills were anticipated to be $400 million dollars. See the attached newspaper article from the Los Angeles Times. Spectra also paid a fine of $134,500 to the Pipeline and Hazardous Materials Safety Administration (PHMSA) in 2012 for seven serious pipeline safety violations, including failure to monitor its pipeline for corrosion and failure to control for corrosion. See Spectra Energy (Texas Eastern) Final Order attached. Spectra has been charged with a total of 8 additional probable violations by PHMSA in the last five years, with the additional preliminary penalties totaling $360,500. (See attached link to PHMSA to view violations.)

It is undisputable that people and animals living nearby the compressor stations will experience adverse health effects from these toxins - even if the air shed is unaffected overall. This assertion is supported by both the Minisink video, the Wilma Subra and Nadia Steinzor study, and the Southwest Pennsylvania study referenced above. This is in violation of NYCRR 211.1, which doesn't state a minimum number of people to be affected.

It is also unethical and unfair to subject ordinary Americans to concentrated toxic pollution in and around their homes, since many cannot leave inasmuch as the major portion of their wealth is invested in their home. However, this is what is happening to people who have the misfortune to live in close proximity to compressor stations. EPA should not allow this and should stand up for the rights of its citizens rather than cater to the right of corporations to make a greater profit for themselves and ruin health and lives in the process. Attached is information on Health Effects regarding some of the toxins emitted by the two compressor stations excerpted from the National Institutes of Health.

In addition a new study recently published by the Environmental Defense Fund found that the amount of methane released by compressor stations, pipelines and other fracking production is greater than previously believed. As you know, methane is 86 times more potent than carbon dioxide as a greenhouse gas over 20 years. This is a serious problem affecting the environment and climate change. The United States should be a leader in addressing climate change. Fossil fuel usage and production should be curtailed, not augmented. A link to a New York Times article

describing the results of this study on this is below.
http://www.nytimes.com/2015/08/05/science/methane-leaks-may-greatly-exceed-estimates-report-says.html?_r=0

In summation, 6 NYCRR 211.1 is violated by the adverse conditions affecting the health of New York State residents and wildlife as a result of the expanded compressor stations in Stony Point and Southeast, and the AIM pipeline project at large. Please take action to deny these Air Permits, which would allow harm to people and animals. Thank you.

Paula Clair
Garrison, New York 10524

cc:Ms. Judith Enck, Region Administrator
United States Environmental Protection Agency, Region 2
290 Broadway
New York, New York 10007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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290 BROADWAY
NEW YORK, NY 10007-1866

SEP 17 2015

Paula Clair
162 Gallows Hill Road
Garrison, NY 10524-1178

Re: Petition for Objection to the Title V permits related to the Algonquin Incremental Market (AIM) Project

Dear Ms. Clair:

On September 3, 2015 the U.S. Environmental Protection Agency received your petition requesting the Administrator to object to the title V permits issued by the New York State Department of Environmental Conservation to the Algonquin Incremental Market (AIM) Project. The petition has been forwarded to my staff for review.

Your petition expressed a variety of concerns including, but not limited to, that the title V permits for both the Southeast Compressor station and the Stoney Point Compressor Station in their current form do not provide for proper protection of the public's health or of the environment.

The EPA is conducting a comprehensive review to ensure that all views are taken into consideration before a final decision is made on the petition. The EPA will address your concerns raised in its final decision package. We are working diligently to complete the review as quickly as possible. Please be assured that you will be informed of the Administrator's decision on the petition as soon as the EPA concludes its review.

If you have any questions on this matter, please call Steven Riva, Chief of the Permitting Section, at (212) 637-4074.

Sincerely,

John Filippelli
Director
Clean Air & Sustainability Division