

7.26.20

Dear Pennsylvania DEP Environmental Quality Board,

I would like to thank DEP for proposing to strengthen regulations that will limit emissions of Volatile Organic Compounds (VOC) and for the opportunity to make comments: PROPOSED RULEMAKING, ENVIRONMENTAL QUALITY BOARD, [25 PA. CODE CHS. 121 AND 129], Control of VOC Emissions from Oil and Natural Gas Sources

Protect Northern PA is a group of concerned individuals who came together this year when a facility to manufacture LNG in Wyalusing Township, Bradford County, was given an air quality permit by DEP.

I. Example of Gas-Processing Facility: New Fortress Energy, LLC

New Fortress Energy LLC, dba Bradford County Real Estate Partners LLC, expects to make 3.5-4 million gallons per day of LNG and ship it overland to a port along the Delaware River for export to foreign markets.

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleClient.aspx?ClientID=346822

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1255306

The facility expects to release VOCs and greenhouse gasses, among other emissions, as stated in its permit.

<https://www.dep.pa.gov/About/Regional/North-central-Regional-Office/Community-Information/Pages/New-Fortress-Energy.aspx>

The emissions from all of the sources at the facility included in this project will not exceed the following limits: 95.90 TPY nitrogen oxides (NO_x, expressed as NO₂), 90.04 TPY carbon monoxide (CO), 35.57 TPY volatile organic compounds (VOCs), 83.25 TPY sulfur oxides (SO_x, expressed as SO₂), 99.67 TPY total particulate matter (filterable plus condensable), 99.67 TPY particulate matter equal to or less than 10 microns (PM₁₀), 99.60 TPY particulate matter equal to or less than 2.5 microns (PM_{2.5}), 8.77 TPY hazardous air pollutants (HAPs), 4.55 TPY any single HAP, 49.02 TPY ammonia, 24.56 TPY sulfur acid (H₂SO₄), and 1,107,670 TPY greenhouse gases (expressed as carbon dioxide equivalent, CO₂e).

The facility is within the vicinity of

- Wyalusing Valley Retirement & Personal Care Home 43850 Route 6. Wyalusing, PA (across the street from the Moravian Rd. start of the LNG plant complex)
- Wyalusing Valley Childrens Center. Day care center. 42932 US-6, Wyalusing, PA (approximately 1 mile from the LNG complex's western fence line)
- Wyalusing Valley Elementary School and Wyalusing High School (approximately 1.5 miles)
- Grovedale Winery, 71 Grovedale Ln, Wyalusing, PA (approximately 1.5 miles)

Problem: This facility will add to air emissions in an area already receiving emissions from fracking-related activities.

Problem: Being a gas-processing facility, it will, of course, require a pipeline. One cannot see the pipeline aspect of the project in eFACTS. Example, when one displays the SITE permits, there is no disclosure of the pipeline. Example:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=833372

Site ID:	833372
Site Name:	BCRP NAT GAS PROC PLT
Address:	
Status:	Active

Client List	DEP Programs	Municipalities/Counties
BRADFORD CNTY REAL ESTATE PARTNERS L	Air Quality Water Planning and Conservation	Wyalusing Twp, Bradford County

Site Permits (0)

No records matched the criteria.

Facility Permits (2)

Authorization Id	Authorization Type	Date Received	Status/Date
1254945	Water Obstruction & Encroachment Pmt	12/11/2018	Issued 07/03/2019
1255306	Minor Facility Plan Approval New Source Performance Std	12/10/2018	Issued 07/24/2019

eFACTS fails to show the following pipeline leading to the above facility:

Site ID:	841380
Site Name:	New Fortress Energy Pipeline
Address:	SUGAR HILL ROAD (SR 2001) BROWNTOWN, PA 18853
Status:	Active

Client List	DEP Programs	Municipalities/Counties
APPALACHIA MIDSTREAM SVC LLC (273	Water Planning and Conservation	Wilmot Twp, Bradford County Wyalusing Boro, Bradford County

Site Permits (0)

No records matched the criteria.

Facility Permits (2)

Authorization Id	Authorization Type	Date Received	Status/Date
1303797	GP-08 Temporary Road Crossings	01/31/2020	Pending
1303798	GP-05 Utility Line Stream Crossings	01/31/2020	Pending

2. Example of “exempt” sources Edge Gathering

Edge Gathering Virtual Pipeline is a business model using mobile liquefaction units. The company anticipates expanding this business model via the deployment of additional “cryobox” liquefaction units.

<https://edgeing.com/news-and-insights/>

We learned from communication with DEP that “truck-based” systems are exempt from air quality permitting under Category 31: *Sources of uncontrolled VOC emissions not addressed elsewhere in this exemption listing modified or newly added, such that emission increases are less than 2.7 tpy. Facilities’ claiming this exemption must provide a 15-day prior written notification to the Department and limit VOC emission increases to less than 2.7 tpy.*

DEPARTMENT OF ENVIRONMENTAL PROTECTION, Bureau of Air Quality, DOCUMENT NUMBER: 275-2101-003, TITLE: Air Quality Permit Exemptions, EFFECTIVE DATE: August 8, 2018. <http://www.depgreenport.state.pa.us/elibrary/GetFolder?FolderID=4564>

Problem: DEP’s approach to exemption does not anticipate VOCs in the aggregate from widespread use of mobile liquefaction units. This is a loophole in your attempt to control VOC and other emissions. What is to prevent LNG mobile units from becoming the new industry norm, dotting the landscape with “mobile” liquefaction units? What is to keep these facilities in the aggregate from lowering air quality for a region, such as our region here, endangering public health?

3. Well-mounted LNG facility: REV-NICHE

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=789618

Problem: DEP’s approach to Air Quality permitting does not aggregate emissions from different companies operating at the same site, i.e., the well operator and the LNG operator.

Our recommendations are the following:

1. Ensure that the VOC rules are applied retroactively so that they will apply to Permit 08-00058A, Site: BCRP NAT GAS PROC PLT; Client: BRADFORD CNTY REAL ESTATE PARTNERS LLC; Authorization type: Minor Facility Plan Approval New Source Performance Std
2. The public should not have to be kept in the dark about pipelines (permits applied for and received) to feed gas to gas-processing facilities. **The level of project segmentation is unacceptable, from a public-disclosure standpoint.** Every gas processing plant has a pipeline leading to it. Pipelines and related compressor stations are a source of emissions. If the client applying for the gas-processing facility does not disclose its pipeline plans, DEP has a duty to ask. eFACTS Site search results need to be more disclosing of an entire project.
3. Apply VOC rules to the complete supply chain of the LNG business, to include overland shipping by rail and tanker truck.
4. Disallow any source of VOC from being “exempt.” Similarly, remove the minimum size and operating times criteria for regulatory inclusion. Small equipment, collectively, can result in significant emissions.
5. Ensure that mobile truck-based LNG systems and stationary-well-mounted LNG processors are included in VOC control rules.
6. Ensure that strict VOC limits apply to all petrochemical projects (fertilizer, methanol, ethane crackers, etc.), such as those facility-types just encouraged by the legislature with HB 732.
7. Publicly post all DEP Air Quality permits and exemptions in an easily viewable format, such as a table with the name of the facility, location, status (e.g., new, renewal, RFD-exempt), expiration date, and link to DEP correspondence. The public needs to be able to view all sources in an area.
8. We suggest more ambient air monitoring stations to collect real data measuring the levels of air pollutants in the Marcellus Shale region.

Thank you for receiving our comments.

Diana G Dakey

On behalf of

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