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west virginia department of environmental protection

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# Response to Public Comment

R13-3277

Mountain Valley Pipeline, LLC

Stallworth Compressor Station

Date: April 11, 2016

# Table of Contents

<b>BACKGROUND INFORMATION .....</b>	<b>3</b>
<b>OVERVIEW OF COMMENTS RECEIVED .....</b>	<b>3</b>
<b>ORGANIZATION OF RESPONSE.....</b>	<b>3</b>
<b>GENERAL RESPONSE TO COMMENTS.....</b>	<b>4</b>
<i>Statutory Authority of the DAQ.....</i>	<i>4</i>
<i>DAQ Permitting Process in Context.....</i>	<i>5</i>
<i>General Response Conclusion.....</i>	<i>5</i>
<b>SPECIFIC RESPONSES TO COMMENTS.....</b>	<b>5</b>

## **BACKGROUND INFORMATION**

Mountain Valley Pipeline (MVP) submitted an air quality permit application to construct and operate a natural gas compressor station to be located in Fayette County near Meadow Bridge, WV along the proposed Mountain Valley Pipeline route on October 23, 2015. During the week of January 25, 2016, pursuant to §45-13-8.4, the West Virginia Division of Air Quality (DAQ) provided notice to the public of a preliminary determination to issue Permit R13-3277. The Class I legal advertisements published in *The Fayette Tribune* on January 25, 2016. At that time, the draft permit and Engineering Evaluation/Fact Sheet were made available to the public for review.

The public notice was followed by a public comment period (required to be a minimum of 30 days under §45-13-8.4) scheduled to end at 5:00 P.M. on February 24, 2016. During the public comment period, the DAQ accepted comments on our preliminary determination to issue Permit R13-3277 and on all related documents. Upon request by multiple persons, to provide information on the permitting action and to facilitate the submission of comments, the DAQ held, on March 15, 2016, pursuant to §45-13-9, a public meeting concerning Permit R13-3277 at the Meadow Bridge Volunteer Fire Department in Meadow Bridge, WV. The public comment period was extended from February 24, 2016 to the end of the public meeting on March 15, 2016.

## **OVERVIEW OF COMMENTS RECEIVED**

The DAQ received written comments during the public comment period. Comments were received by and/or on behalf of the following individuals, groups, and organizations:

- Ronald & Elizabeth Tobey
- Wayne Persinger
- Loretta Munique
- Jill Fischer
- Sharon Burdette
- Peter Burdette
- George Callison
- Angelica Carothers
- The Fayette County Commission
- Greenbrier River Watershed Association
- Ohio Valley Environmental Coalition
- Headwaters Defense

Pursuant to §45-13-8.8, all submitted comments received during the public comment period have been reviewed and are appropriately addressed in this document.

## **ORGANIZATION OF COMMENT RESPONSE**

The DAQ's response to the submitted comments includes both a general and specific response section. The general response defines issues over which the DAQ has authority and by contrast, identifies those issues that are beyond the purview of the DAQ. The general response also describes the statutory basis for the issuance/denial of a permit, discusses the role of the pre-construction permitting process in the larger divisional goal of maintaining air quality in WV.

The specific response summarizes each relevant non-general comment that falls within the purview of the DAQ and provides a response to it. This document does not reproduce all the comments here (they are available for review in the R13-3277 file). Instead, each comment is summarized and key points are listed. The DAQ makes no claim that the summaries are complete; they are provided only to place the responses in a proper context. For a complete understanding of submitted comments, please see the original documents in the file. The DAQ responses, however, are directed to the entire comments and not just to what is summarized. Comments that are not directly identified and responded to in the specific response section of this document are assumed to be answered under the general response section.

## **GENERAL RESPONSE TO COMMENTS**

### ***Statutory Authority of the DAQ***

The statutory authority of the DAQ is given under the Air Pollution Control Act (APCA) - West Virginia Code §22-5-1, *et. seq.* - which states, under §22-5-1 ("Declaration of policy and purpose"), that:

It is hereby declared the public policy of this state and the purpose of this article to achieve and maintain such levels of air quality as will protect human health and safety, and to the greatest degree practicable, prevent injury to plant and animal life and property, foster the comfort and convenience of the people, promote the economic and social development of this state and facilitate the enjoyment of the natural attractions of this state.

In regards to the questions that surround a water discharge (NPDES) permit associated with this permitting action, MVP has made an application with WVDEP. Any water discharge approval would be done by the Division of Water and Waste Management (DWWM). Water Resources – DWWM contact information is 304-926-0495.

### ***DAQ Permitting Process in Context***

It is important to note that the DAQ permitting process is but one part of a system that works to meet the intent of the Air pollution Control Act and the Federal Clean Air Act in WV. The DAQ maintains a Compliance/Enforcement (C/E) Section, an Air Monitoring Section, a Planning Section, *etc.* to effect this. Most pertinent to the permitting process, the C/E Section regularly inspects permitted sources to determine the compliance status of the facility including compliance with all testing, monitoring, record-keeping, and reporting requirements.

### ***General Response Conclusion***

In conclusion, to all commenters who referenced substantive non-air quality issues, the APCA and 45CSR13 does not grant the DAQ the authority to take into consideration such issues in determining to issue or deny the permit. Further, the requirements of 45CSR13 require the DAQ to, when denying a permit, explicitly state the reason pursuant to §45-13-5.7. Additionally, the permit is but the beginning of the involvement of the DAQ with a source. After issuance, the facility will receive regular inspections to determine compliance with the requirements as outlined in the applicable permit.

## **SPECIFIC RESPONSES TO COMMENTS**

### **COMMENT #1**

1. DEP Should not review the Mountain Valley Pipeline air pollution permit application until after the FERC has issued their permit.
2. Hearings need to be advertised and held in Greenbrier County which is impacted by the station due to its proximity and weather patterns.
3. The area of the proposed station is not isolated. There are many homes with families and businesses within a few miles radius of the proposed station.
4. MVP needs to disclose ALL volatile organic compounds (VOC), to be produced by the proposed station, so we can comment about them in context of farming and livestock danger, as well as their danger to human life and health.

**Received From:** Ronald & Elizabeth Tobey

### **DAQ Response**

As a requirement for the application process, companies must apply for any and all applicable state air permits before issuance of the FERC permit. The DAQ permit only covers the emission units located at the site. In the event that the pipeline route is changed such that the chosen compressor station site must be changed, MVP will then apply to the DAQ for a relocation permit for the station.

§45-13-9.2 states “*The Secretary, or a duly authorized representative shall preside over such meeting and assure that all interested parties have ample opportunity to present comments. Such meeting shall be held at a convenient place as near as practicable to the location or proposed location of the stationary source.*” The meeting location, recommended by the Fayette County Commission, was held approximately 6.5 miles from the site. Since comments were received from Greenbrier County, the DAQ feels that appropriate notice was given to the area, and given the close proximity, was accessible to Greenbrier County residents.

The quality of the air of a defined local area - in this case Fayette County, WV - is determined by its status with respect to the National Ambient Air Quality Standards (NAAQS). The Clean Air Act, which was last amended in 1990, requires the Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set National Ambient Air Quality Standards for six principal pollutants, which are called "criteria" pollutants. They are listed at <http://www.epa.gov/air/criteria.html>.

Counties that are known to be violating these standards are, for specific pollutants, designated by the EPA as in "non-attainment" with the NAAQS. Counties that are not known to be violating these standards are, for specific pollutants, designated by the EPA as in "attainment" with the NAAQS. Fayette County is designated by EPA as in attainment with all 6 NAAQS.

The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year.

VOC is a regulated pollutant with a specific definition under the Clean Air Act. They are regulated together not as individual chemicals.

The state rules, as they apply to air quality, are designed to ensure human health and safety, and environmental welfare. Upon review of the permit application, it has been determined that the facility, as proposed with the types and amounts of pollutants being emitted, should meet all applicable state rules and federal regulations.

**DAQ Action**

None.

### **COMMENT #2**

1. I believe the total emission calculation is flawed. No low load or below 0°F emissions were considered.
2. The permit on the DEP/DAQ website does not have Attachment E.

**Received From:** Wayne Persinger

### **DAQ Response**

The emissions for the two compressor turbines were calculated at 100% load at 0° F. This is a conservative, worst-case estimate given that lower load calculations would result in lower emissions and the time operated below 0°F would be very small.

Attached E (Plot Plan) of Permit Application R13-3277 is available on the website.

### **DAQ Action**

None.

### **COMMENT #3**

I am writing this letter to formally protest the issuance of the permit referenced above. West Virginia is not the nations dumping ground for the toxic waste products from the oil and gas wells being purposed in our area! I do not believe that the DEP has the authority to sell our state to the big energy companies, no matter what the dollar amount is.

I realize there is big money involved from the big oil and gas industries, but is that big money worth the lives of our children and grandchildren? I, for one, do not want to chance the possibility that my children and grandchildren could die from the exposure to these toxic wastes which will be released into our ground and air.

Therefore, I want it on record that I do protest the issuance of this permit. I believe the lives of our young and elderly is not worth the big money promised from these wells in West Virginia.

**Received From:** Loretta Munique

### **DAQ Response**

It is the public policy of this state, and the purpose of Article 5 (Air Pollution Control Act) of the West Virginia Code, to achieve and maintain such levels of air quality as will protect human health and safety, and to the greatest degree practicable, prevent injury to plant and animal life and property, foster the comfort and convenience of the people, promote the economic and social development of this state and facilitate the enjoyment of the natural attractions of this state.

As stated previously above, pursuant to §45-13-5.7, the DAQ shall issue a permit unless a determination is made that the proposed construction, modification, registration or relocation will violate applicable emission standards, will interfere with attainment or maintenance of an applicable ambient air quality standard, cause or contribute to a violation of an applicable air quality increment, or be inconsistent with the intent and purpose of this rule or W. Va. Code §22-5-1 et seq., in which case an order denying such construction, modification, relocation and operation shall be issued. Therefore, all air permit applications must be reviewed to determine if

all applicable standards are met. The proposed facility meets all applicable state and federal air quality regulations. An in-depth regulatory review is provided in the R13-3277 Engineering Evaluation.

**DAQ Action**

None.

**COMMENT #4**

I am opposed to the proposed compressor station to be located in Fayette County, WV, near Meadow Bridge. I do not believe the Mountain Valley Pipeline to be constructed by EQT Corporation is in compliance with Air Quality Standards. In addition, the citizens in the immediate area as well as in surrounding counties have not been adequately informed about this corporate, industrial construction project and the dangers it will bring. As a concerned citizen in the area affected by the MVP, I demand public hearings to be held in accessible locations all along the proposed MVP route.

Thank you for your attention to this matter.

**Received From:** Jill Fischer

**DAQ Response**

As stated previously above, pursuant to §45-13-5.7, the DAQ shall issue a permit unless a determination is made that the proposed construction, modification, registration or relocation will violate applicable emission standards, will interfere with attainment or maintenance of an applicable ambient air quality standard, cause or contribute to a violation of an applicable air quality increment, or be inconsistent with the intent and purpose of this rule or W. Va. Code §22-5-1 et seq., in which case an order denying such construction, modification, relocation and operation shall be issued. Therefore, all air permit applications must be reviewed to determine if all applicable standards are met. The proposed facility meets all applicable state and federal air quality regulations. An in-depth regulatory review is provided in the R13-3277 Engineering Evaluation.

A Public Meeting for the proposed Stallworth Compressor Station was held at the Meadow Bridge Volunteer Fire Department on March 15, 2016 at 6:00 PM. FERC (Federal Energy Regulatory Commission) held Public Scoping Meetings for the MVP project at six different locations along the pipeline between May 4 and May 13, 2015, the closest being Nicholas County High School in Summersville on May 13, 2015.

The DAQ has no permitting authority over the pipeline itself, only over any compressor stations. Any comments, questions, or concerns about the pipeline should be sent to FERC.

**DAQ Action**

None.

## **COMMENT #5**

I am very much opposed to Draft Permit # R13-3277 for Mountain Valley Pipeline, LLC, Stallworth Station. I live in Greenbrier County nor far from the proposed area of the pumping station. This area has large amounts of swamp land. Fog often rises and remains over these areas until mid morning. I'm concerned that the heavy wet fog could keep the gasses from moving out of the area. My family moved to this area 12 years ago for the peace and quiet, clean air and water that this area has to offer. Please don't permit this beautiful area to be ruined. Please do not issue a permit for this compressor station.

**Received From:** Sharon Burdette

### **DAQ Response**

It is the public policy of this state, and the purpose of Article 5 (Air Pollution Control Act) of the West Virginia Code, to achieve and maintain such levels of air quality as will protect human health and safety, and to the greatest degree practicable, prevent injury to plant and animal life and property, foster the comfort and convenience of the people, promote the economic and social development of this state and facilitate the enjoyment of the natural attractions of this state.

As stated previously above, pursuant to §45-13-5.7, the DAQ shall issue a permit unless a determination is made that the proposed construction, modification, registration or relocation will violate applicable emission standards, will interfere with attainment or maintenance of an applicable ambient air quality standard, cause or contribute to a violation of an applicable air quality increment, or be inconsistent with the intent and purpose of this rule or W. Va. Code §22-5-1 et seq., in which case an order denying such construction, modification, relocation and operation shall be issued. Therefore, all air permit applications must be reviewed to determine if all applicable standards are met. The proposed facility meets all applicable state and federal air quality regulations. An in-depth regulatory review is provided in the R13-3277 Engineering Evaluation.

### **DAQ Action**

None.

## **COMMENT #6**

Please do not issue a permit for the Stallworth Compressor Station. I feel the air quality and value of this area will be greatly reduced. Out of area travelers remember this area for its beauty and serenity. Please reject Mountain Valley Pipeline's request for a permit. Thank you for your time.

**Received From:** Peter Burdette

### **DAQ Response**

The quality of the air of a defined local area - in this case Fayette County, WV - is determined by its status with respect to the National Ambient Air Quality Standards (NAAQS). The Clean Air Act, which was last amended in 1990, requires the Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children,

and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set National Ambient Air Quality Standards for six principal pollutants, which are called "criteria" pollutants. They are listed at <http://www.epa.gov/air/criteria.html>.

Counties that are known to be violating these standards are, for specific pollutants, designated by the EPA as in "non-attainment" with the NAAQS. Counties that are not known to be violating these standards are, for specific pollutants, designated by the EPA as in "attainment" with the NAAQS. Fayette County is designated by EPA as in attainment with all 6 NAAQS.

The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year.

The state rules, as they apply to air quality, are designed to ensure human health and safety, and environmental welfare. Upon review of the permit application, it has been determined that the facility, as proposed with the types and amounts of pollutants being emitted, should meet all applicable state rules and federal regulations.

#### **DAQ Action**

None.

#### **COMMENT #7**

The following comments are on behalf of myself, as a landowner of 280 acres located immediately south of the proposed location for the Stallworth compressor station. My comments also reflect the views of my brother, sister and niece, who, when combined, own an additional 215 acres immediately south of the proposed location. My brother, disabled with COPD, maintains his permanent residence on his property. His residence is located, at a distance of approximately 2200 feet, in the valley directly below the proposed compressor station.

Our concerns are for the anticipated excessive and continuous noise pollution and the atmospheric-sensitive air pollution from the massive gas-turbine compressor engines. We fear that, under unfavorable or adverse atmospheric conditions, the air pollutants from the turbines will settle into our valley, creating undesirable, and most assuredly unhealthy, smog conditions; not only for us, but for all our neighbors up and down the valley.

The long-term effect of the existence of the proposed compressor station will result in severe restriction of the potential uses of our privately-owned property, both during our lifetimes and by our descendants. It readily follows that our property values will suffer severe adverse consequences.

**Received From:** George Callison

#### **DAQ Response**

The quality of the air of a defined local area - in this case Fayette County, WV - is determined by its status with respect to the National Ambient Air Quality Standards (NAAQS). The Clean Air Act, which was last amended in 1990, requires the Environmental Protection Agency (EPA) to

set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set National Ambient Air Quality Standards for six principal pollutants, which are called "criteria" pollutants. They are listed at <http://www.epa.gov/air/criteria.html>.

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The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year. The state rules, as they apply to air quality, are designed to ensure human health and safety, and environmental welfare. Upon review of the permit application, it has been determined that the facility, as proposed with the types and amounts of pollutants being emitted, should meet all applicable state rules and federal regulations.

#### **DAQ Action**

None.

#### **COMMENT #8**

This letter is to express concerns over the proposal to build a natural gas compressor station called Stallworth near Meadow Bridge. As a resident of Meadow Bridge, I have concerns over the release of "total hazardous air pollutants" into the air. How will this effect residents and our environment? I do not want cancerous and deadly agents released into the towns' air causing birth defects, neurological issues in our children and harm to our residents. I feel a public meeting is necessary and should be required before construction of such project to educate our town on the known risks and benefits of such project.

**Received From:** Angelica Carothers

#### **DAQ Response**

The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year. The state rules, as they apply to air quality, are designed to ensure human health and safety, and environmental welfare. Upon review of the permit application, it has been determined that the facility, as proposed with the types and amounts of pollutants being emitted, should meet all applicable state rules and federal regulations.

A public meeting was held on March 15, 2016 at the Meadow Bridge Volunteer Fire Department.

**DAQ Action**

None.

**COMMENT #9**

On behalf of the citizens of Meadow Bridge and all Fayette County residents, the Fayette County Commission respectfully requests that WVDEP DAQ hold a public meeting in Meadow Bridge to allow for adequate local review and comment on this permit application.

Questions and areas of concern include:

1. What is the relationship between emissions that are monitored and the intensity, frequency and duration of the actual human exposure to toxic materials from natural gas compressor stations?
2. Do proposed permit limits include the impact of fugitive emissions, venting/blowdowns and emissions that will occur during the construction phase?
3. What are the cumulative health impacts when other sources of air pollution are also considered?
4. Does baseline air quality data exist for the affected area? Can DAQ require the applicant to collect this data?
5. How will emissions of ultrafine particulate matter be monitored?
6. What are the qualifications and performance history of the contractors who will build the facility?
7. How will permit limits be monitored and enforced?
8. What are the consequences to the company if permit limits are violated?
9. What recourse is available to local residents if adverse impacts to public health are documented?

**Received From:** Fayette County Commission

**DAQ Response**

Fugitive emissions from venting/blowdowns are calculated and taken into account during the evaluation of the permit application, but limits are not placed on these actions. As typical with compressor stations, venting and blowdowns are vented to the atmosphere, but according to permit application R13-3277, the equipment will be equipped with blowdown silencers and should only occur when the turbines are shutdown which MVP anticipates a maximum of 12 times per year.

Other sources of air pollution are not considered with this facility because there are no similar sources close to the site.

The quality of the air of a defined local area - in this case Fayette County, WV - is determined by its status with respect to the National Ambient Air Quality Standards (NAAQS). The Clean Air Act, which was last amended in 1990, requires the Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set National Ambient Air Quality Standards for six principal pollutants, which are called "criteria" pollutants. They are listed at <http://www.epa.gov/air/criteria.html>.

Counties that are known to be violating these standards are, for specific pollutants, designated by the EPA as in "non-attainment" with the NAAQS. Counties that are not known to be violating these standards are, for specific pollutants, designated by the EPA as in "attainment" with the NAAQS. Fayette County is designated by EPA as in attainment with all 6 NAAQS.

The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year.

The DAQ does not have the authority to require the applicant to perform baseline testing.

All emissions from this source will be the result of the combustion of Pipeline Quality Natural Gas, with the bulk of the emissions coming from the large compressor turbines. Particulate Matter emissions are calculated using manufacturer data for this equipment at worst-case operational conditions.

The DAQ does not have the authority to evaluate qualifications and performance history of building contractors.

This facility, being a minor source of air pollution will be placed on a two-year inspection schedule, however if any possible problems are sent to the DAQ, inspectors will be dispatched.

Upon inspection of the facility, any permit violations will be met with enforcement action.

The National Ambient Air Quality Standards (NAAQS) are in place to protect the general public. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

**DAQ Action**  
None.

### **COMMENT #10**

We would like to request a public meeting on this permit.

**Received From:** Greenbrier River Watershed Association

### **DAQ Response**

A public meeting was held on March 15, 2016 at the Meadow Bridge Volunteer Fire Department.

### **DAQ Action**

None.

### **COMMENT #11**

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.

1. 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, nitrous acid styrene, 2-methyl butane, 2 methyl pentane, 3 methyl pentane, ethyl benzene, benzene, ethane, propane, methanol and naphthlene. 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 the proposed facility before a permit is granted, given the toxic and carcinogenic nature of these emissions.
2. 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.
3. 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 this permit?
4. 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 the people living nearby?

5. 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.
6. What has DEP done to consider cumulative impacts of other nearby sources of air pollution?
7. 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?
8. 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.
9. Will nearby residents be totally assured – in writing, by the DEP DAQ, as well as the compressor station operators – that there will be no discernable deterioration to their current air quality or noise pollution levels?
10. 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?
11. 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 compressor 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.

**Received From:** Ohio Valley Environmental Coalition

### **DAQ Response**

The emissions listed by the PA DEP from the compressor stations are the result of the combustion of natural gas. The pipeline quality natural gas used at the Stallworth Station will produce these emissions, primarily Nitrogen Oxides and Carbon Monoxide. The individual HAPs listed will be in trace amounts.

All emissions from this source will be the result of the combustion of Pipeline Quality Natural Gas, with the bulk of the emissions coming from the large compressor turbines. Particulate Matter emissions are calculated using manufacturer data for this equipment at worst-case operational conditions.

The DAQ does not have the authority to evaluate qualifications and performance history of building contractors. This facility, being a minor source of air pollution will be placed on a two-year inspection schedule, however if any possible problems are sent to the DAQ, inspectors will be dispatched.

The quality of the air of a defined local area - in this case Fayette County, WV - is determined by its status with respect to the National Ambient Air Quality Standards (NAAQS). The Clean Air Act, which was last amended in 1990, requires the Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

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Upon inspection of the facility, any permit violations will be met with enforcement action.

Other sources of air pollution are not considered with this facility because there are no similar sources close to the site.

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The DAQ does not have the authority to require the applicant to perform baseline testing.

The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year.

According to MVP, the station is designed to operate completely un-manned with systems in place to automatically shut down the facility in the event of problem. Also personnel will be on call from a reasonable distance to respond to any issues.

Noise from this facility will be subject to standards set forth by Fayette County and more stringently FERC. According to MVP, initial modelling of the facility indicates that noise standards will be met.

**DAQ Action**

None.

## COMMENT #12

We, the members of Headwaters Defense, are residents of West Virginia who together respectfully submit this request for a Public Hearing to the West Virginia Department of Environmental Protection on the subject of the proposed Stallworth Compressor Station and the potential issuance of air emissions permits.

1. There is no emergency evacuation plan in this permit. This is unacceptable given the risk of a catastrophic explosion or incident.
2. Compressors are largely exempt from regulatory oversight under certain portions of The Clean Air Act, and the State of WV has done nothing to close those loopholes. Without additions to the permit to do so, the issuance of the currently proposed permit places the health, safety, and welfare of Fayette County at risk.
3. The DEP intends on allowing the following emissions into the air: Particulate Matter less than 10 microns, 20.30 tons per year (TPY); Particulate Matter, 20.30 TPY; Oxides of Nitrogen, 79.84 TPY; Carbon Monoxide, 91.28 TPY; Volatile Organic Compounds, 13.46 TPY; Total Hazardous Air Pollutants, 4.53 TPY. This list is deeply troubling on its own and should be cause for alarm to nearby residents. However, there is a more exhaustive list of chemicals that should also be considered when discussing the air emissions of Compressor Stations. Comparing the small number of chemicals that are listed on the permit to be monitored to large number of pollutants associated with compressors indicates dangerously lax regulatory oversight. We demand that a complete list and quantity of chemicals that will be released into the air by this compressor station. This list should be available to residents before the scheduled public hearing.
4. There is overwhelming evidence proving the hazardous health effects of living, working, and spending time near compressor stations for large diameter shale gas transmission pipelines.
5. The proposed quantity of emissions from the Stallworth Station will inevitably cross property boundaries into surrounding private property due to wind currents. At Headwaters Defense, we recognize this as permitted trespassing and taking of private property rights without just compensation.
6. The ridges and valleys typical of the topography in the location of the proposed Stallworth Compressor Station are known to form atmospheric inversion currents and microclimates. Harmful pollutants could easily be trapped in the hollows, to build up in dangerous quantities.
7. We demand that primary air current directions be included in the permit application so that the public can see which property owners will bear the brunt of airborne contamination.
8. The proposed location is a fragile wetland ecosystem in the Greenbrier River Watershed. It will be uphill from Buffalo Creek, a tributary of the Greenbrier River and will cross a seasonal wetlands that feeds into the Meadow River as well as Buffalo Creek. We need to know that the proposed operation at the Stallworth Compressor Station will not interfere with the organisms or ecosystems services provided by the Buffalo Creek wetlands because they are the property of the State of West Virginia taxpayers.

9. There are high concentrations of Radon 222 gas that would be moving constantly throughout this infrastructure. We are aware that Radon 222 gas emissions are not mentioned in the permit application for the Stallworth Compressor Station. The constant movement of the Radon 222 through this infrastructure forms solid Polonium scale in the equipment.

We need a public hearing regarding the subject of the proposed Stallworth Compressor Station and the potential issuance of air emissions permits.

**Received From:** Headwaters Defense

**DAQ Response**

The proposed air quality permit issued by the DAQ does not include emergency evacuation plans because this is beyond the authority of the DAQ.

Compressors located at these stations are not exempt from regulatory oversight. Reciprocating engines and Turbines are subject to State Rules as well as Federal New Source Performance Standards.

The additional pollutants listed in the comment letter from Headwaters Defense are accounted for as either a VOC or in the Total HAP emissions. There are hundreds of individual VOCs and HAPs and many of these are only found in trace amounts from the combustion of Pipeline Quality Natural Gas.

The proposed compressor station will be a minor source as defined by the NAAQS given that the criteria pollutants are all below 100 tons per year, no single hazardous air pollutant is greater than 10 tons per year and all hazardous air pollutants combined are less than 25 tons per year.

Ambient air is defined in the CAA as the atmosphere, external to buildings, to which the general public has access. Property boundaries are not taken into account.

The quality of the air of a defined local area - in this case Fayette County, WV - is determined by its status with respect to the National Ambient Air Quality Standards (NAAQS). The Clean Air Act, which was last amended in 1990, requires the Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The Pipeline Quality Gas contained in this pipeline and passing through the Stallworth Compressor Station has been processed upstream and any Radon 222, if present, has been removed.

**DAQ Action**

None.