

A Submission for Enactment to The Government of Fayette County
Regarding Municipal/County Permit Notifications
Concerning Marcellus Shale Impact

As citizens of Fayette County who are deeply concerned about the impact of Marcellus Shale industrialization upon our communities and families, we call upon the government of Fayette County to enact the following provisions:

1. That agendas for the meetings of the Fayette County Planning Commission be published in advance where they are available to concerned citizens of the county, specifically including being posted on the Fayette County web site.
2. That all Municipal/County Notifications of permit applications received by Fayette County under the terms of Act 14 or for which the county receives a comment period be advertised to the public by a legal notice in newspapers (similar to notices of meetings of county boards, such as the zoning hearing board) and be listed on Fayette County's web site, so the public may be informed of permits on which the county receives the opportunity to comment.
3. That citizens be allowed to participate in the Act 14 municipal/county comment process by submitting our own comments to be forwarded to the agency receiving municipal/county comments (e.g. the Department of Environmental Protection (DEP).)
4. That the county take note that municipal notifications received by Fayette County under the terms of Act 14 may constitute important documentation regarding potential Marcellus Shale Impact, and in light of the fact that county government is accountable to the voters for the wise and appropriate spending of the Marcellus Shale Impact Fee, that Marcellus Shale related municipal/county notifications be inspected by the county for their implications in assessing Marcellus Shale Impact.

In pursuing this request we are formalizing a request made orally before the Fayette County Planning Commission on Thursday, June 13, 2013 during the second public comment period held within that meeting.

Background

There are certain types of permit applications, received by DEP, which must be accompanied by certification that municipalities and counties have been informed by the company submitting the application of its intention to submit. The statute governing this process is known as Act 14. Examples of permit applications which must receive Act 14 municipal notification are: Erosion and Sedimentation (E&S) permits for building unconventional well pads, E&S permits for building pipelines, and Air Quality permits for compressor stations. These permits are likely to be *expedited permits*, which means DEP is likely to provide no general public comment period upon the permit, and certainly no opportunity for a hearing.

For instance, a document DEP provides with instruction to applicants for preparing the Notice of Intent (NOI) to apply for the E&S permit for a well site states:

Act 14, which amended the Commonwealth's Administrative Code (71 P.S. §510-5), requires every applicant for a new, amended, or revised permit to give written notice to each municipality (borough, township) and county government in which the facility is located. The municipality and county government must receive the written notice at least thirty (30) - days before the Department may issue or deny approval of coverage. **The municipal notice also provides an opportunity for local government to identify any concerns or issues associated with the proposed project before the Department completes its review of the NOI.** [Emphasis added].

It is evidently the practice in Fayette County when these notifications are received that they be passed to the Fayette County Planning Commission. It is our understanding that these items may be reviewed by the Planning Commission during a portion of the agenda known as "Project Review", but this appears to be a largely pro forma process, in which the Planning Commission does not have any expectation of submitting comments. We respectfully suggest that there are certainly circumstances regarding some of these permits that bear on functions that do fall to the county, and that may warrant comment. And as citizens, we wish to participate in this process, and definitely have things to say.

An example of how this works is the process by which compressor stations are permitted. Compressor stations must receive an Air Quality permit for dehydration equipment and natural gas fired compression engines. DEP has what is known as a *General Permit* (GP-5) that covers most compressor stations. A general permit is a "canned" permit which is issued off the shelf for many individual permit applications. While DEP will hold a public comment period when it *revises* this canned document, there is no public participation at all in evaluating individual applications under a general permit. DEP revised GP-5 recently, and this lack of public participation encountered criticism from the Environmental Protection Agency (EPA). (Pennsylvania Air Quality permits fall under the Air Pollution Control Act, which incorporates by reference major sections of the federal Clean Air Act. In effect, DEP acts as the agent of the federal government in enforcing the Clean Air Act, through a mechanism called the State Implementation Plan (SIP). The SIP must receive approval from the EPA. So, EPA's opinion does matter.) Here is what EPA had to say about DEP's lack of public participation in the application process for GP-5:

"EPA has consistently stated that to be federally enforceable, two criteria must be met: (1) the limitations must be contained in a permit that is federally enforceable and has undergone public participation and (2) the limitation must be enforceable as a practical matter. Since the application for authorization does not undergo any public review EPA does not believe that it would be federally enforceable."

In language that sounds as if it could have come right out of Alice in Wonderland, DEP responded as follows:

“The Department agrees that limiting the potential to emit (PTE) in accordance with the specifications in the Application for Authorization to Use GP-5 is not “federally enforceable” since the application seeking restriction of PTE has not undergone public participation. Therefore, the owner or operator seeking authorization to use GP-5 may not limit the PTE to a specific level using the specifications in the application.

The Department has prohibited the use of the final GP-5 for Title V facilities. Condition 9(c) of Section A in the final GP-5 requires the emissions from all sources and associated air pollution control equipment located at a natural gas compression and/or processing facility to be less than the major source thresholds on a 12-month rolling sum basis. Condition 14 of Section A in the final GP-5 requires the owner or operator of the facility to maintain records that clearly demonstrate to the Department that the facility is not a Title V facility. Therefore, the emission limits established in GP-5 are federally enforceable.” (Pennsylvania Department of Environmental Protection Bureau of Air Quality, “Comment and Response Document, General Permit GP-5, January 31, 2013”, http://www.dep.state.pa.us/dep/deputate/airwaste/aq/permits/gp/January_31_2013-GP5_Comments_and_Response_Document.pdf, p. 29.)

The municipal/county Act 14 comment period *is the only form of public comment that exists* for a compressor station Air Quality Permit under GP-5. As if this weren’t bad enough, DEP in its latest revision has broadened the applicability of GP-5 to include almost all compressor stations. A compressor station was disqualified from coverage under the previous version of GP-5 if any single compression engine had more than 1500 horsepower. Under the new GP-5, this limitation is removed. The only way a compressor station becomes disqualified from using GP-5 under the latest revision is if it is categorized as a “Major Source” of air pollution. The definition of Major Source is complicated, and depends on a number of factors. It is exactly the public participation process by which we are allowed to question whether the designation of a compressor station as a minor source is correct. Some of those public comments have produced results. For instance, in Washington County, the operator *withdrew* one compression engine after public comments revealed that it would have been a major source under the original application. As citizens we can look at this restriction on public comment and (as the EPA observed!) determine that it is unjust. If county government gets a comment opportunity when we the people do not, it is reasonable for us to respectfully request that we be allowed to participate in that comment opportunity.

As everyone knows, it is a new day for local government regarding Marcellus Shale, even given that most of the regulation of Marcellus Shale occurs at the state level: the Marcellus Shale Impact Fee is an explicit recognition by the Commonwealth of Pennsylvania that there are impacts, many of these impacts fall on counties and municipalities, the Impact Fee can help defray some of the cost of these impacts, and local government is accountable to the voters for spending this money both wisely and relevantly. Accordingly, we believe it is appropriate to give more scrutiny to Act 14 notifications in the wake of the passage of the Marcellus Shale Impact Fee. These notifications are likely to provide the earliest notice anyone receives of where, when, and how Marcellus Shale impact may occur. It stands to reason that if there is a comment process on Marcellus Shale impact — the only form of comment process that may exist — it should be utilized.

There are many respects in which Act 14 notifications are **deficient** from the standpoint of assessing Marcellus Shale impact. Here are some examples:

- No PPC plan for well site E&S permits

Every well site E&S permit application is required to include a PPC (Preparedness, Prevention, and Contingency) Plan. Even though the PPC Plan is the fundamental document describing the well site operator’s plan for emergency response, and “first response” is a function of local government, the PPC plan is sent to

DEP, and not copied to county or municipal government. In fact, if county Emergency Management personnel want a copy of a well site PPC plan, the only “official” mechanism for receiving this is for county government to formally request it under Right to Know or File Review procedures. This is surely not happening on a routine basis. There is no reason why a well site operator cannot submit to the county and to municipalities a template PPC plan, refer to that document in its Act 14 municipal notification form, and then only detail significant differences from the template in the municipal notification. No well site operator can reasonably claim this is too burdensome. A municipal notification which does not provide at least a reference to a PPC plan already in local government’s hands is plainly deficient, **and the county should say so**. The Act 14 comment process gives us the vehicle (*recognized under statute!*) for saying so.

- PPC plans that are incomplete

It is a DEP requirement that every well site PPC plan include an MSDS (Material Safety Data Sheet) for every hazardous substance likely to be stored on a well site. Is the county being given these on a routine basis? Is the well site operator truly providing an MSDS for every hazardous substance likely to be found on a well site? If not, the PPC plan is plainly deficient. A sample PPC plan from an E&S permit from 2010 provided an MSDS for only two substances: gasoline and diesel fuel. To imply that these are the only hazardous substances to be found on a Marcellus Shale well site is simply not correct. Notably missing from the inventory of MSDSs were: fracking compounds and produced water. A PPC plan which fails to provide an MSDS for these substances is simply deficient.

Then there is the important matter of radiation. As citizens have pointed out on numerous occasions, the Marcellus Shale is inherently radioactive. There were citizens present at the June 13, 2013 Fayette County Planning Commission meeting who have actually personally measured significant Marcellus Shale radioactivity *on their own property*. To its credit, the Uniontown Herald-Standard had a four-part series on this subject recently, examining it in detail. It is important to note that the Fayette County zoning code, in section §1000-502, states unambiguously: “**No activity shall emit radioactivity at any point**”. It is precisely the PPC plan which should detail how a well site operator intends to comply with §1000-502. A PPC plan which fails to do so is deficient.

Here is another example: In Fayette County we have at least one Marcellus Shale well site (Kikta Unit 1H-4H) which is adjacent to a still-burning **underground mine fire** (the Phillips Mine Fire, case # OSM 26(7605)102.1). Are issues related to the underground mine fire covered in the PPC plan? This is exactly the sort of information the county should be providing to the DEP.

- Missing information related to impact

Act 14 notifications tend to be quite small compared to the applications they cover. There are many ways in which these are routinely failing to give counties and municipalities sufficient information. Here is just a small sample of the kind of issues that should be passed through to the DEP through the Act 14 comment process:

Bashline to Skirpan 8 pipeline (permit # ESX11-051-0001): the municipal notification included a map that showed only a small piece of the project (one stream crossing). Springhill CS to Bezjak Pipeline (permit # ESX11-051-0002, authorization 945146, issued 1/2/2013): the map in the municipal notification for this amendment showed the whole project with no circle or arrow to show where the amendment was. Springhill #2 Compressor Station (presumed permit # GP5-26-00587C — this permit application has apparently not yet been received by DEP): list of air pollution amounts (called “PTE” — Potential To Emit — in air pollution jargon) lists only “less-than” amounts (which just happen to be the thresholds for Major Source).

This last case (Springhill #2 Compressor Station) is one of those that was before the Planning Commission for

Project Review on 6/13/2013, and several nearby residents gravely concerned about this project attended. It is a storied case indeed, but has never been put before DEP in any form of public participation because no such venue has ever existed — notwithstanding the EPA’s comments on this issue. Because this case does have such a history of impact, we are submitting (below) a Citizen Act 14 Municipal Notification Comment on this case as an example of the kind of participation we are seeking in the Act 14 process.

Respectfully submitted,

James E. Rosenberg, 555 Davidson Road, Grindstone, PA 15442

Phyllis Carr, 518 Hope Hollow Road, Lake Lynn, PA 15451, very close resident to Springhill #2

Jeaney Carr, 520 Hope Hollow Road, Lake Lynn, PA 15451, very close resident to Springhill #2

Joseph A. Bezjak, 210 Smithfield New Geneva Rd, Smithfield, PA 15478, nearby property owner to Springhill #2

Mildred P. Bezjak, 210 Smithfield New Geneva Rd, Smithfield, PA 15478, nearby property owner to Springhill #2

Carl Bezjak, 17 Theodori Drive, Uniontown, PA 15401, nearby property owner to Springhill #2

David Headley, 132 Volek Road, Smithfield, PA 15478, nearby resident to Springhill #2

Linda Headley, 132 Volek Road, Smithfield, PA 15478, nearby resident to Springhill #2

Marigrace Butela, 1601 W Crawford Ave, Connellsville PA 15425

Citizens' Act 14 Municipality/County Comment
on Forthcoming Presumed Permit # GP5-26-00587C
Springhill #2 Compressor Station (DEP Site ID 720794)
Application Under GP-5 To Replace Two Gas-Fired Compression Engines

Fayette County received a certified letter (Letter) dated May 1, 2013, from Laurel Mountain Midstream Operating, LLC, (LMM), describing a forthcoming application for a permit under GP-5 for the Springhill #2 Compressor Station located at 585 Hope Hollow Road, Lake Lynn, PA, in Springhill Township. (Attached as Attachment A.) The letter speaks in the past tense of an application that LMM “has submitted”; however, at this writing, the eFACTS web site maintained by the Department of Environmental Protection (DEP) shows no Authorization Record for this site received more recently than 09/08/2011. That Authorization (ID 894174) concerned permit # GP5-26-00587B. Accordingly, following the standard numbering practice in use at the DEP Bureau of Air Quality (BAQ), we are presuming that the LMM letter refers to a forthcoming application to which BAQ will assign permit # GP5-26-00587C. This matter came before the Fayette County Planning Commission on 06/13/2013 as part of its normal agenda item known as Project Review. Citizens concerned with unconventional natural gas infrastructure permits only received notice of the agenda for this meeting on the day of the meeting. Although the notice was short, no fewer than 7 citizens attended this meeting, an 8th citizen sent a written comment via E-mail, and several spoke. We requested of the Planning Commission that a mechanism exist for citizens to participate in the Act 14 Municipality/County comment process. Accordingly, given that a new Authorization process for the Springhill #2 facility has apparently not yet commenced, we respectfully request that DEP-BAQ accept these comments and take them into account in considering a successor application by LMM to permit # GP5-26-00587B (Authorization ID to be determined).

1. The Act 14 Municipal/County Notification is deficient for not listing specific PTE amounts.

As will be seen from Attachment A, Potential to Emit (PTE) amounts are not actually listed. Instead, LMM has simply listed “Less Than” amounts where the ceiling quantity just happens to be the Major Source threshold for each listed pollutant. As DEP is aware, PTE amounts have been subject to challenge in the past (e.g. in public comments for full Plan Approvals), particularly where a PTE is exceedingly close to the Major Source threshold for that pollutant. In some cases these challenges have succeeded in getting DEP to agree that the as-applied-for PTE is incorrect and that if correctly evaluated would be over the Major Source threshold. (E.g. see DEP Comment Response Document on Plan Approval 63-00958A, Welling Compressor Station, Washington County.) LMM’s notification letter PTE “listing” is nothing more than a non-specific assertion that Springhill #2 will remain a Minor Source — with no explanation to county or municipal officials what this means or what the implications are. LMM’s application for GP5-26-00587B listed specific PTE amounts. Surely in the case of the forthcoming application, LMM knows what the actual PTE amounts it will be asserting are. These should be listed specifically in the Municipality/County Notification.

2. The Act 14 Municipal/County Notification is deficient for not stating whether the engine swap described has already occurred.

As described in Letter, the substance of the new application is the substitution of two already-permitted Caterpillar G3516LE engines for two “new” Caterpillar G3516B 4SLB engines. We have substantial reason to believe this exchange may have already occurred — perhaps nearly two years ago. In the summer of 2011, area residents reported that an engine swap had occurred. We have a solid eyewitness account of an engine being removed from the facility by truck. In response to these reports, one of us (James E. Rosenberg) inquired of an attorney expert in air pollution matters, on 07/11/2011, whether a swap for different engine models was allowed under the Air Quality permit then in force at Springhill #2 (GP5-26-00587A). DEP was notified, and the result was Inspection ID 1990102, 07/22/2011. A copy of that Inspection Report is here attached as Attachment B. For

whatever reason — perhaps miscommunication — the purpose of the inspection was described not as an engine swap but as an “allegation that unpermitted engines had been installed.” In fact, as an E-mail from the inspector on October 3, 2011 reveals (here attached as Attachment C), Inspection ID 1990102 **did not evaluate** whether the engine models operating at Springhill #2 were in fact the same models listed in the letter granting the permit.

Now some nearly two years later, we have an apparent permit application for: *an engine swap*. We believe it is perfectly natural to question whether in fact this is the swap that was reported to have occurred two years ago, and which LMM is only now acknowledging through the permit process. We call upon DEP to evaluate immediately what engine models are actually installed and operating at Springhill #2. If these are not the ones permitted under the existing permit (GP5-26-00587B) then DEP should determine when they were installed and immediately pursue an enforcement action against LMM. If an engine swap did occur by July 2011, then by not stating this, the application for GP5-26-00587B was erroneous, and **that permit should be suspended**.

It should be noted that this operator has a *documented history* of installing equipment prior to receiving proper permits. E.g. see Shamrock Compressor Station Violation ID 605598, 02/23/2011, Construction, Modification, Reactivation and Operation of Sources, Plan Approval Requirements. “Failure to obtain a plan approval for the construction, modification, reactivation of source(s) and/or cleaning device”, Enforcement ID: 279621, Consent Assessment of Civil Penalty, Penalty Amount Assessed: \$7,000. For documentation concerning construction prior to receiving a local zoning permit at Springhill #2 Compressor Station, see below.

3. There was never any community hearing on this facility prior to construction.

Like most municipalities in Fayette County, Springhill Township does not do its own zoning. Zoning for Springhill Township is handled at the county level. (DEP cannot, of course, be expected to know this; zoning questions are exactly the kind of reason why the municipal/county notification process is important!) Compressor stations in Fayette County have been deemed to fall under the designation in the Fayette County Zoning Code known as Public / Private Works, §1000-108. To build a Public / Private Works, LMM was obliged to obtain a Special Exception under the zoning code. However, the facility *was already built* by the time LMM applied to the Fayette County Zoning Hearing Board for its special exception. See Attachment D for a copy of a Cease and Desist notice posted on the premises by the county in this zoning matter. When the zoning hearing did finally occur, neither air pollution nor noise ramifications were discussed.

4. This facility has a very significant amount of public interest.

Area residents have spoken in public of problems from air pollution from the Springhill #2 Compressor Station numerous times, including:

Public comments to the Fayette County Commissioners, June 24, 2010,
http://www.co.fayette.pa.us/records/Documents/CommMeetingMinutes08-11/CommissionersJun_24_2010.pdf;

Public comments to the Fayette County Commissioners, February 24, 2011, http://www.co.fayette.pa.us/records/Documents/CommMeetingMinutes08-11/February_24_2011_Commissioners.pdf;

Public comments to the Fayette County Commissioners, July 28, 2011,
http://www.co.fayette.pa.us/records/Documents/CommMeetingMinutes08-11/July_28_2011_Commissioners.pdf;

Hearing testimony before the EPA on Oil & Gas Air Pollution, September 27, 2011, Pittsburgh, PA, Docket # EPA-HQ-OAR-2010-0505;

Testimony before a public input hearing on an application before the PUC, October 26, 2011, Application of Peregrine Keystone Gas Pipeline, LLC, before the Pennsylvania Public Utility Commission for a Certificate of Public Convenience, Docket No. A-2010-2200201, Transcript pp 132-137;

Testimony before the Fayette County Rezoning Hearing Board, May 15, 2012.

Copies of a petition containing dozens of signatures is here attached as Attachment E. Many of these signatures are from residents nearby Springhill #2.

While this may seem like an impressive amount of public participation, in fact it has not been public participation before the body that matters regarding air pollution: DEP. We respectfully request that DEP take note of Springhill #2 as a location of significant interest to the public of Fayette County.

5. This facility is located in an Environmental Justice Area.

The entirety of Springhill Township, Fayette County, is included in an Environmental Justice Area as defined by DEP. This means that it should be accorded an enhanced degree of public participation. To the contrary, there has been **no public participation at all** in any of the General Plan Approvals granted by DEP to this facility. Unfortunately, Springhill #2 Compressor Station is **missing** from the data set behind the eMapPA layer “Air Emission Plants” (see ftp://www.pasda.psu.edu/pub/pasda/dep/AirEmissionPlants2013_04.zip); DEP’s policy document concerning Environmental Justice states that eMapPA will be used to determine Environmental Justice facilities, so the fact that this site is missing from this data set is clear evidence that DEP has not performed due diligence with regard to Environmental Justice for this facility. While we recognize that as defined in DEP’s policy regarding enhanced public participation for Environmental Justice Areas, none of the Air Quality General Plan Approvals GP5-26-00587, GP5-26-00587A, GP5-26-00587B qualify as “trigger permits” (by virtue of not being Major Source permits), we assert that the extraordinary amount of public interest in this facility must cause DEP to use its permitted discretion and *hold a hearing* on any future Air Quality permit for this facility. Moreover: we protest vociferously that to require Major Source as the Trigger Permit criterion for Environmental Justice enhanced public participation is to deny Environmental Justice completely, since it denies to the public *the means to contest* whether designation of this facility as a minor source is correct.

In its letter of application for General Plan Approval GP5-26-00587B, LMM stated:

“The application is being submitted to establish self-imposed, federally enforceable emission limitations for the facility and equipment to allow the Springhill Compressor Station **to remain a minor source** of emissions.” [Emphasis added] (File Review materials on GP5-26-00587B).

This language clearly implies that LMM itself believed that without GP5-26-00587B, Springhill #2 might not be seen as a federally enforceable minor source. In its document “Springhill Compressor Station General Operating Permit Application Supplement”, LMM states:

“With federally enforceable emission limits (FEL) in-place, Springhill Compressor Station will qualify as a **synthetic** minor source.” [Emphasis added.]

Synthetic minor source means the facility would qualify as a Major Source if all equipment is run to full capacity; it is a synthetic minor source precisely because it is only “artificially self-imposed” limitations that prevent equipment from emitting at major source levels. We contend that for this reason, any permit application establishing a compressor station in an Environmental Justice area as a Synthetic Minor Source should be considered as an Environmental Justice Trigger Permit, and should receive the same Environmental Justice

enhanced public participation as a Major Source Permit.

As DEP is fully aware, EPA commented on the recent revision to GP-5:

“EPA has consistently stated that to be federally enforceable, two criteria must be met: (1) the limitations must be contained in a permit **that is federally enforceable and has undergone public participation** and (2) the limitation must be enforceable as a practical matter. Since the application for authorization does not undergo any public review **EPA does not believe that it would be federally enforceable.**” [Emphasis added.]

In its comment response document, DEP replied (in part):

“The Department agrees that limiting the potential to emit (PTE) in accordance with the specifications in the Application for Authorization to Use GP-5 is not “federally enforceable” since the application seeking restriction of PTE has not undergone public participation.”

This throws into severe doubt any argument that enhanced public participation under Environmental Justice provisions may be denied in this case because it is only a minor source. The public is left with a horrendous catch-22: under DEP’s Environmental Justice policy, only Major Source permits qualify as “trigger permits” for Environmental Justice enhanced public participation; it is certification as a federally enforceable *synthetic* minor source that establishes Springhill #2 as a minor source; EPA contends that a permit such as GP5-26-00587B is not federally enforceable due to lack of public participation ... around and around this goes. We vigorously contend that DEP’s policy that an Air Quality permit must be Major Source to qualify as an Environmental Justice “trigger permit” is to deny Environmental Justice completely, since there is no Environmental Justice in the determination that a source is a synthetic minor source.

We emphatically insist that a hearing be held on this facility.

6. Zoning authorization for this facility has been locally contested.

The Special Exception required for this facility as a Public/Private Works has been appealed. That litigation is ongoing.

A recent zoning violation report alleges that equipment that is part of the compressor station has been installed on neighboring leased property which was not covered by the Public/Private Works Special Exception. This report is here attached as Attachment F. That matter has not been adjudicated.

While we are mindful that DEP has no jurisdiction on local zoning matters, we call upon DEP to note the zoning status of this facility is in dispute, that there has been a history of construction at this facility prior to obtaining proper permits, and from this to give substance to the question that has been raised about whether an engine swap has already occurred (Item 2, above).

7. This facility has been the subject of numerous complaints whose investigation by DEP we contend has been defective.

The eFACTS site record for Springhill #2 shows the following complaint inspections:

2051948	03/14/2012	Complaint Inspection	No Violations Noted
1990102	07/22/2011	Complaint Inspection	No Violations Noted
1960547	03/25/2011	Complaint Inspection	No Violations Noted

1927812	11/02/2010	Complaint Inspection	No Violations Noted
1917961	10/05/2010	Complaint Inspection	No Violations Noted

While every one of these inspections shows “No Violations Noted”, we contend that at least some of these inspections were defective. Inspection ID 1990102 has already been discussed; it was defective for not inspecting the matter at hand (engine *swap* rather than additional construction). In addition, consider Inspection ID 1917961. (This Inspection Report is here attached as Attachment G.) The inspector notes:

“I observed three compressor engines (2 natural gas and 1 electric). 1 electric and 1 natural gas engines were running.”

Since air pollution from an electric compression engine is minimal, for air pollution purposes, this inspection was of a facility **running at half capacity**. Did the inspector determine whether the complaint resulted from emissions from the *other* engine — magically not running at the time the inspector arrived? Did the inspector request that that engine be turned on? Did the inspector return and inspect again when the facility was running at full capacity? The answer to all of these questions appears to be no. We contend that this is documented evidence of a faulty inspection. We suspect other inspections of this facility may be similarly flawed.

An inspection should take place with a facility running *at full capacity*, through the full range of states experienced by the equipment during normal operation, including the full range of states experienced by a dehydrator. If a facility is undergoing maintenance at the time of an inspection, when full-function operation cannot be observed by an inspector, the inspection should be repeated when such operation can be observed. It is important to note that DEP provides no venue whereby an inspection may be contested. It is exactly concerns such as these which can and should be aired in a hearing.

In sum: Springhill #2 Compressor Station is a storied facility of great public interest in an Environmental Justice Area. It has never received any form of public participation (enhanced or otherwise) on air quality permits. As concerned citizens of Fayette County, many of whom live in close proximity to Springhill #2 Compressor Station, we vehemently express that the operator of this facility has raised serious concerns at the local level, of which DEP should be aware under the County/Municipality Notification process. We strenuously request a hearing on any ongoing or future application for a Plan Approval (General or otherwise) for this facility. We vehemently request that DEP inquire thoroughly as to whether the engine swap described in Letter has already taken place, and if any engine models differ from those permitted under General Plan Approval GP5-26-00587B, DEP revoke GP5-26-00587B forthwith.

Respectfully submitted,

James E. Rosenberg, 555 Davidson Road, Grindstone, PA 15442

Phyllis Carr, 518 Hope Hollow Road, Lake Lynn, PA 15451, very close resident to Springhill #2

Jeaney Carr, 518 Hope Hollow Road, Lake Lynn, PA 15451, very close resident to Springhill #2

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David Headley, 132 Volek Road, Smithfield, PA 15478, nearby resident to Springhill #2

Linda Headley, 132 Volek Road, Smithfield, PA 15478, nearby resident to Springhill #2

Marigrace Butela, 1601 W Crawford Ave, Connellsville PA 15425

Attachment A
Municipal / County Notification Regarding
Springhill #2 Compressor Station
from Laurel Mountain Midstream Operating, LLC

PZCD
3CC
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Laurel Mountain Midstream Operating, LLC
Park Place Corporate Center 2
2000 Commerce Drive
Pittsburgh, PA 15275
(412) 787-7300
(412) 787-6006 fax

May 1, 2013

Via Certified Mail

7012 1010 0002 6284 3658

7012 1010 0002 6284 3641

Springhill Township

198 Lake Lynn Rd.
Lake Lynn PA 15451

Fayette County

61 East Main Street
Uniontown, PA 15401

**Subject: Municipality and County Notification
Application to Use General Permit GP-5
Laurel Mountain Midstream Operating, LLC
Springhill Compressor Station (CS)
Springhill Township, Fayette County, PA**

Dear Sir/Madam:

This notice is to inform you that Laurel Mountain Midstream Operating, LLC (LMM) has submitted an Application to Use General Permit GP-5 to the Pennsylvania Department of Environmental Protection (DEP) for the existing Springhill Compressor Station (CS), located at 585 Hope Hollow Road, Lake Lynn, Springhill Township, Fayette County, Pennsylvania.

This Application has been prepared and submitted to provide for the following equipment and operations at the Springhill Compressor Station (CS):

- One (1) Existing 1,500 bhp Electric Motor (CE-01)
- Two (2) NEW 1,380 bhp Caterpillar (CAT) G3516B 4SLB Engines (CE-02 and -03)
- One (1) Existing 25.0 MMscf/day Dehydrator (DEHY-01)
- One (1) Existing 0.25 MMBtu/hr Reboiler (BLR-01)
- Four (4) Existing Produced Water Tanks (474 bbl Total) (TKS)
- Existing Produced Water Truck Load-Out (TLO)
- Existing Startup/Shutdown/Maintenance (SSM)
- Existing Piping and Equipment Fugitives (FUG)
- Other Existing equipment and operations with de minimis emissions.

The following equipment will be removed from the Springhill Compressor Station (CS):

- Two (2) Existing 1,340 bhp Caterpillar (CAT) G3516LE Engines (CE-02 and -03)

36-07-0147-01 permit.

ZHB 10-20

36-14-0078 permit & well

Municipality and County Notification
Application to Use General Permit GP-5
May 1, 2013
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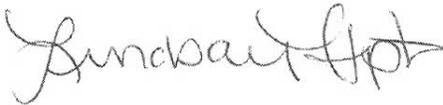
The Springhill CS continues to qualify as a Minor (or Area) Source with site-wide Potential to Emit (PTE) as follows:

- NOx: PTE Less Than 100 tpy
- CO: PTE Less Than 100 tpy
- VOC: PTE Less Than 50 tpy
- SO2: PTE Less Than 100 tpy
- PM10/2.5: PTE Less Than 100 tpy
- Each HAP: PTE Less Than 10 tpy
- Total HAPs: PTE Less Than 25 tpy
- CO2e: PTE Less Than 100,000 tpy

If you have any questions concerning this notice or the application you can contact me at (412) 787-3931 or the PADEP at:

Air Quality Program
Southwest Regional Office
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Sincerely,



Lindsay F. Sumpter
EH&S Specialist

Attachment B
DEP Inspection Report Inspection ID 1990102

26-587 A

Date(s) of Inspection: <i>7-22-2011</i>	TV <input type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input checked="" type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): <i>6PS-26-587A</i>	Expiration Date: <i>12-9-2014</i>	Case #: <i>26-587</i>	PF ID #: <i>719219</i>
--	---	--	------------------------------------	--------------------------------------	--------------------------	---------------------------

Company Name: <i>Laurel Mt. Industries</i>	Municipality: <i>Springhill Twp</i>	County: <i>Fayette</i>
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Plant Name: <i>SPRINGHILL #2</i>	Physical Location: <i>Hopa Hollow Road</i>	Federal ID — Plant Code #: <i>26-4578063-7</i>
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Responsible Official:	Mailing Address: <i>1550 Conaopolis Hrs Rd.</i>
-----------------------	--

Title: <i>Kathy Masley - Env. Contact</i>	Mailing Address: <i>Conaopolis PA 15108</i>
--	--

Phone #(s): <i>412-865-2174</i>	
------------------------------------	--

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input checked="" type="checkbox"/> Complaint Inspection (CI)
<input type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:
---	----------------

AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:
---	----------------

Mark (X) All Activities That Apply:

<input type="checkbox"/> File Review	<input type="checkbox"/> Pre-Inspection Briefing	<input type="checkbox"/> Exit Interview/Briefing
<input type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

Investigated 3rd Party Allegation that unpermitted engines had been installed. Found site unchanged since Mtr 25 visit - 2 No engines as evidenced by stacks. No evidence of additional construction.

The rumor of unpermitted construction had earlier been discussed with a local complainant and had been linked to pipeline construction, not an increase in the # of compressors

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Company Representative:	Title:	Signature:	Date:
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DEP Representative: <i>Dan Harey</i>	Title: <i>ELM</i>	Signature: <i>Dan Harey</i>	Date/Time: <i>7/26/11</i>
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This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

Attachment C
E-mail from DEP Inspector Regarding Inspection ID 1990102

From: "Haney, Dan" <dahaney@pa.gov>
To: Jim Rosenberg <jr@amanue.com>
Subject: RE: Springhill #2 FLIR video, etc.
Date-Sent: Monday, October 03, 2011 10:44:40 -0400

Hi Jim;

The July visit was to follow up on an unsubstantiated rumor that seems to have a life of its own. I did not reference engine model numbers as I was not conducting an EPA Level II inspection as defined.

Dan

Attachment D
Cease and Desist Order from Fayette County Zoning Inspector
upon Springhill #2 Compressor Station
for Unpermitted Construction
6/28/2010

NOTICE

Notice is hereby given that violations of the Zoning Ordinance of Fayette County exist in the premises located at OFF HOPE HOLLOW RD. PARCEL 36-07-0147-01
IN SPRINGHILL TWP OWNED BY JAMES DELANSKY

The violation is as follows:

LLM OPERATING, LLC IS BUILDING A COMPRESSOR STA.
WITHOUT ZHB 10-20 APPROVAL OR A PERMIT.

and specifically is a violation of the following section of the aforementioned Ordinance: ART. II SEC 1000-202
+ 1000-203, ARTICLE X SEC. 1000-1001 + 1000-1004.

You are hereby requested to appear at the office of the Fayette County Planning, Zoning and Community Development Commission located in the Fayette County Court House, 61 East Main Street, Uniontown, Pa. 15401.

Pursuant to the provisions of the aforementioned Ordinance, you as the owner or operator of the above premises are hereby notified to

CEASE AND DESIST

Within five (5) days of the date shown on this notice, an inspection will be made to ascertain whether or not this notice has been complied with. If it has not been complied with, you will be subject to the penalties prescribed by the Zoning Ordinance.

Date

6/28/10

FAYETTE COUNTY ZONING INSPECTOR

Sue E. Martin

Attachment E
Petition from Residents of Springhill Township and Fayette County
Regarding Springhill #2 Compressor Station
(copies)

A United Appeal For Governmental Action

Moral codes in a civilized society proclaim that government insure the public's safety and protection from correctable and hazardous environmental conditions. Public safety is the top priority of government.

Many citizens of southwestern Pennsylvania living in the Fayette County and Springhill Township regions feel that state and local political leaders and environmental agencies must do more to ensure a safe and wholesome environment for all living in the Marcellous gas production regions. There is a collective belief that public safety -- not campaign contributions -- must be the guiding principle for creating environmental law.

Many environmental issues have risen from an illegally built compression station. Its construction was a blatant violation of building codes and after a subsequent appeal to zoning officials, a variation was granted.

Since this compression station became operable, a crescendo of complaints ,concerning serious health issues, has risen resulting from noticeable air, water and land pollution. These health issues demand a thorough investigation of the environment near the Springhill compression station.

We, the undersigned, emphatically petition our local and state political leaders to use their legal authority to urge state and local environmental officials and agencies to investigate the abundant serious health issues experienced by a number of local citizens and especially the health issues for those living near the compression station in Springhill Township.

Petition Signers

Name

Address

Petition Signers

Name	Address
<u>Robert Nickerson</u>	<u>510 Hope Hollow Rd</u> <u>Lake Lynn, Pa 15451</u>
<u>Donna Henry</u>	<u>132 Volek Rd</u> <u>Smithfield, Pa 15478</u>
<u>Arda Headley</u>	<u>132 Volek Rd</u> <u>Smithfield, Pa 15478</u>
<u>Mary Snyder</u>	<u>23 Adele St</u> <u>Uniontown PA 15401</u>
<u>Donna Hall</u>	<u>199 Volek Rd</u> <u>Smithfield PA 15478</u>
<u>Elizabeth</u>	<u>104 Volek Rd</u> <u>Smithfield, Pa 15478</u>

Petition Signers

Name

Address

Mary Laury

21 Laurel Rd
Smithfield, Pa 15476

Benji Brown

143 Volek Rd.
Smithfield, Pa 15476

A United Appeal For Governmental Action

Moral codes in a civilized society proclaim that government insure the public's safety and protection from correctable and hazardous environmental conditions. Public safety is the top priority of government.

Many citizens of southwestern Pennsylvania living in the Fayette County and Springhill Township regions feel that state and local political leaders and environmental agencies must do more to ensure a safe and wholesome environment for all living in the Marcellous gas production regions. There is a collective belief that public safety -- not campaign contributions -- must be the guiding principle for creating environmental law.

Many environmental issues have risen from an illegally built compression station. Its construction was a blatant violation of building codes and after a subsequent appeal to zoning officials, a variation was granted.

Since this compression station became operable, a crescendo of complaints concerning serious health issues, has risen resulting from noticeable air, water and land pollution. These health issues demand a thorough investigation of the environment near the Springhill compression station.

We, the undersigned, emphatically petition our local and state political leaders to use their legal authority to urge state and local environmental officials and agencies to investigate the abundant serious health issues experienced by a number of local citizens and especially the health issues for those living near the compression station in Springhill Township.

Petition Signers

Name

Address

Joseph N. [Signature]

139 River Ave.

Masondown, PA 15461

Petition Signers

Name	Address
<u>Tabitha Farmer</u>	<u>139 River Ave Masontown</u> <u>PA 15461</u>
<u>Judy J. Yeager</u>	<u>146 Harrow Rd</u> <u>Jake Lynn, Pa 15451</u>
<u>Bonnie J. Yeager</u>	<u>146 Harrow Rd</u> <u>Jake Lynn, Pa 15451</u>
<u>Thomas Yeager</u>	<u>3651 Smithfield Masontown</u> <u>Smithfield, Pa 15478 R.d.</u>
<u>Frederick D. Henge</u>	<u>11075 Georges Fouchance Rd</u> <u>Smithfield, PA 15475</u>
<u>Eudora J. Henge</u>	<u>11075 Georges Fouchance Rd</u> <u>Smithfield, PA 15475</u>

Petition Signers

Name	Address
<u>W. J. Dill</u>	<u>345 Puritanig road</u> <u>Uniontown PA 15401</u>
<u>Jackie Elsworth</u>	<u>923 Moore Street</u> <u>Uniontown PA 15401</u>
<u>Hubert Bell</u>	<u>16 South Main</u> <u>Ft. Mifflin PA 15470</u>
<u>Hubert Bell</u>	<u>16 South Main</u> <u>Ft. Mifflin PA 15470</u>
<u>Kenneth Rose</u>	<u>156 Homer Blvd 2nd fl</u> <u>Allegheny PA 15415</u>
<u>Dylan Bell</u>	<u>16 South Main</u> <u>Ft. Mifflin PA 15470</u>

Petition Signers

Name	Address
<u>Ann-J Bell</u>	<u>16 South Main</u> <u>York Maine 04181</u>
<u>Michelle Roberts</u>	<u>16 South Main</u> <u>York Maine PA 04174</u>
<u>Connie Guppy</u>	<u>156 Honor Roll Road</u> <u>Lake Lynn PA 04191</u>
<u>John Fields</u>	<u>215 PLOSSER Hill Rd</u> <u>LAKE LYNN PA</u>
<u>Deborah Bened</u>	<u>521 TONGUE HOLLOW Rd</u>
<u>Marta Vance</u>	<u>3314 Hickorytown Rd</u> <u>Springfield Va 04178</u>

Petition Signers

Name	Address
<u>Bill Cramer</u>	<u>4543 MORGANTOWN RD</u> <u>LAKE LYNN PA 15451</u>
<u>Colly Burhett</u>	<u>1603 Cornish Rd</u> <u>Lakelyna PA 15451</u>
<u>David McMoran</u>	<u>1024 Prospect</u> <u>St. Point Marion P.A.</u>
<u>Nina Helt</u>	<u>1024 Prospect</u> <u>St Point Marion P.A.</u>
<u>John King</u>	<u>1024 Prospect St</u> <u>Point Marion P.A.</u>
<u>Louis Jones</u>	<u>1103 Green Hill Rd</u> <u>Smithfield Pa</u>

Petition Signers

Name	Address
<u>George Alley</u>	<u>339 Oystep Rd Smithfield Pa.</u>
<u>RICH LOGUE</u>	<u>4747 MORGANTOWN RD Smithfield PA - 15478</u>
<u>LAVRIE LOGUE</u>	<u>6 11 11 11</u>
<u>MIKE NART</u>	<u>4754 MORGANTOWN RD SMITHFIELD PA 15478</u>
<u>LOEL NART</u>	<u>4751 MORGANTOWN RD SMITHFIELD PA 15478</u>
<u>MARY VARANO</u>	<u>1026 Old LAKE LYN. Rd LAKE LYN. PA 15457</u>

Petition Signers

Name

Address

FRANKLIN VABANO

1026 Old Lake Lynn Rd
LAKE LYNN PA 15451

Heather Vavrek

232 Nolan Hill Rd.
PA Marion, PA 15474

Carl M. Court

4698 Morgantown Rd
LAKE LYNN, Pa. 15451

Robert [unclear]

4760 Morgantown Rd
PA Marion PA 15474

Arthur M. Cain

P.O. Box 79 Lake Lynn Pa 15451

Arthur M. Cain

55 Lake Lynn Rd

David Coburn

1273 Water St
Brownsville Pa
15417

Petition Signers

Name

Address

Donald Stewart

389 Lake Lynon Rd. Lake Lynon
PA. 15451

Julia Costello

414 CHERRY AVE
FRENCH MARION PA 15474

ERIN STRIMEL

414 CHERRY AVE
FRNCH MARION PA 15474

KIM VUGELER
KIM VUGELER
SHIRL VUGELER
SHIRL VUGELER

159 GRAND VIEW
FL. MARION PA 15474

Jonathan Ward

36 Lewis Ln
Smithfield Va, 15478

Brenda Branch

Rodde

Carly Carney

115 Fullen + Moore rd
Mount Marion 15474

Rodde

448 VILAN Hill #1 MARION
15474

PETITION SIGNERS

Name

Address

Bill Yonke

232 Blaney Hollow Rd

Smithfield Pa

Paul R. Deyers

4856 Morgan Lane Pa 15451

266 Hope Hollow Rd
Lakemeyers Pa 15451

Larry Carr

Diane H. Johnson Rt Marion

Lloyd Wolverton Jr

Shelby Belt

Charles D Doyle

256 Blosser Hill Rd LAKE LYNN

PA 15451

136 TOMCAT Hollow

Smithfield, PA. 15478

Oliver Wolverton

110 Fallen Timbers Rd

Pt Marion PA

110 Fallen Timbers Rd

Pt MARION, PA 15424

Jack Wolverton

Petition Signers

Name

Address

E. J.

724 725

RE Brunner

493 Old Farm Rd
Smithfield PA

Reyn Massy

183 GRAN'S Hill School
Smithfield

Carly

17 P Locklyn

Emily Stoda

33 East Church St.
Lynchburg PA 15436

Thonda Carr

101 Railroad St Apt 3
Point Marion PA 15474

Petition Signers

Name	Address
James A Knapp	101 Railroad St Apt 43 Point Marion, PA 15474
Della Ann	520 Hope Hollow Luke Lynn Pa 15451
Amy Ann	518 Hickell Rd Hope Lynn Pa 15451
Jeannette Ann	520 Hope Hollow R.D. Luke Lynn PA 15451
Sarah J. Fife	400 Sunshine Hollow Road Uniontown PA 15401
_____	_____
_____	_____

Attachment F
Zoning Violation Report
Alleging Construction of Compressor Station Equipment
Outside Parcel with Zoning Special Exception for Public / Private Works
Springhill #2 Compressor Station

PS 1

Appendix I

Violation Report Form

Date: 6-12-13

Property Owner(s) Name: Robbie Gas and Fuel, Inc.
LEASE with LMM LLC - LAUREL MOUNTAIN MIDSTREAM
OPERATING LLC

Address of property: 558 Hope Hollow Rd.
LAKE LYNN, PENNA 15451

Tax Map Number: 36-14-0078

Phone Number: 724-725-0187

Zoning District: Springhill Twp.

Alleged Violation(s): PART of COMPRESSOR STATION, 36-0700147-01
CONDENSATE TANK, Separator, Sludge Tank,
other equipment needed for operation of
COMPRESSOR PLANT.

Compliance can be met: _____

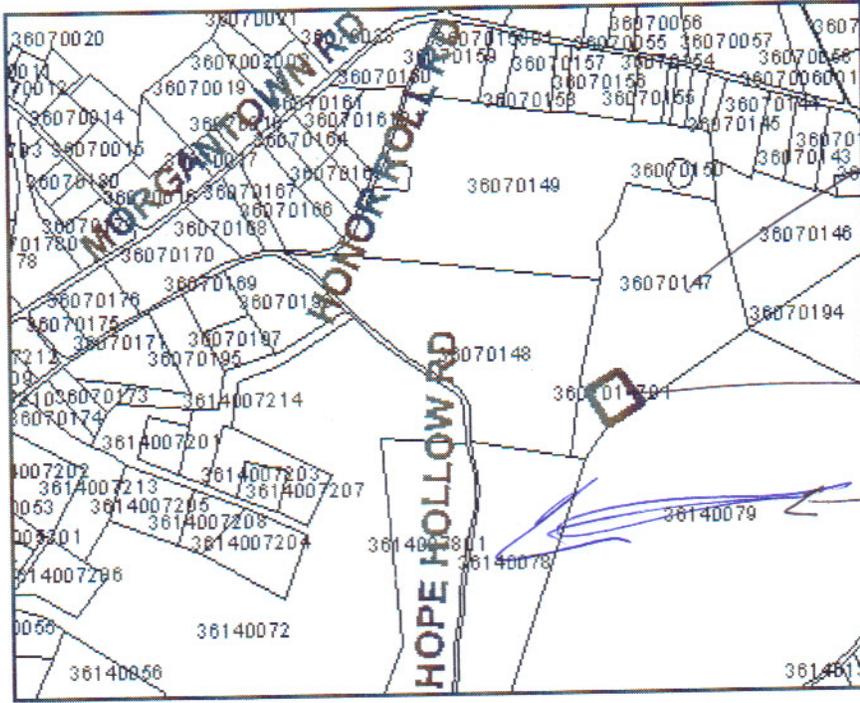
Any decisions by ZHB, Planning Commission, or Commissioners: _____
If so, what decision and year: _____
(make copies for case file)

Any zoning permits issued for alleged violations: _____
If so, provide zoning permit number and year (copy for case file): _____

Does a zoning violation exist from the research conducted: _____
Date research was conducted: _____

PARID: 3607014701
LAUREL MOUNTAIN MIDSTREAM
OPERATING LLC

OFF HOPE HOLLOW RD



Fayette County

36-07-0147
LMM
Purchase
Nov 2010
RIS 3138-2098

6-30-10
2HB-10-20
36-07-0147-01
LMM Permitted

Robbie
Cont & Fuel,
Inc.
Equipment,
Sludge Tank,
Condensate
Tank, Etc.
needed for
operation of
Compression
Station
Sprayhill
36-14-0078

Attachment G
DEP Inspection Report Inspection ID 1917961

2700-FM-AQ0003 Rev. 2/2004		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection: 10/6/10		Permit #(s): GP5-26-00587A		AIRS CDS# (For Permitted Sources): 719219	
Company Name: Laurel Mtn Midstream		Municipality: Springhill Twp.		County: Fayette	
Plant Name: Springhill #2 Comp Station		Physical Location: 585 Hope Hollow Rd		Federal ID + Plant Code #: 26-4578063-7	
Responsible Official: Katie Maloy			Mailing Address: 1550 Coraopolis Heights Rd		
Title: Staff Env Scientist			Moon Township, PA 15108		
Phone #(s):					

Mark (X) All Inspection Types That Apply To This Inspection:

<input type="checkbox"/> Announced	<input type="checkbox"/> Level 2 Inspection (L2)	<input type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Multi-Media Inspection (MM)	<input checked="" type="checkbox"/> Complaint Inspection (CI)
<input type="checkbox"/> Observation/Partial Inspection (OB)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Other:		

For Level 2 Inspections, Mark (X) All Activities That Apply:

<input type="checkbox"/> File Review - Pre-Inspection	<input type="checkbox"/> Pre-Inspection Briefing	<input type="checkbox"/> Verify Production Rates
<input type="checkbox"/> Compliance Assurance Monitoring Review	<input type="checkbox"/> Check All Significant Sources	<input type="checkbox"/> Verify Operation of Control Devices
<input type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Verify Operation of CEMS
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Operation & Maintenance Records/Logs	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Other:		<input type="checkbox"/> Exit Interview/Briefing

Comments:

I performed a complaint inspection at Laurel Mountain Midstream's Springhill #2 Compressor Station. I came unannounced and met Katie Maloy, Staff Env Scientist/Specialist, and John Borris, Team Leader Compression. I observed three compressor engines (2 natural gas and 1 electric). 1 electric and 1 natural gas engines were running. I also observed the Nitco dehydrator and reboiler and drip tanks. I observed no malodors leaving the property. No deviations noted. Facility deemed in compliance.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report		Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Company Representative:	Title:	Signature:	Date:
DEP Representative: Michael Kaufman	Title: AQ5	Signature: Michael Kaufman	Date/Time: 10/7/10

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

Response Information

Priority: 3
Program: Air Quality
Complaint Type: Odor
Date Resp Assigned: 09/21/2010
Date Response Due: 11/02/2010
Date First Response: 09/23/2010
Date Resolved: 10/05/2010
Date Referred: --
Referred To: --
Comments: --
Inspector: MICHAEL P KAUFMAN

Supervisor: DAN M HANEY *DH*

Investigation Information

Date Investn Assigned: 09/23/2010 Date Investigated: 10/05/2010 Type: Site Visit
Inspector: MICHAEL P KAUFMAN Violation(Y/N): No
eFACTS Inspection Id: 1917961 Investigation Id: 271777

Investigation Description: I spoke with Katie Maley, Environmental Specialist, for Williams about the complaint of on 9/23/10. Ms. Maley was unaware of any problems relating to the Springhill Compressor Station on or about the date of 9/20/10. She had to check with the operator of the station to see if any issues had been reported. The site is permitted for two (2) Cat. G3526LE natural gas fired compressor engines and a Natco .25mm Btu dehydrator. The odor that was said to be coming from the site was that of a paint thinner smell which is not something normally associated with that of a natural gas fired compressor. Ms. Maley reported that the three trucks reported being seen entering the facility the next morning were dump trucks carrying aggregate for use in a construction project.

I spoke with Ms. Maley again on 9/30/10. The site had been manned both 9/20/10 and 9/21/10, but nothing was reported by the operators of the facility as could be causing malodors. No malfunctions or problems had been reported onsite.

I inspected the site on 10/6/10. I met Katie Maley, Environmental Specialist, and John Borris, Team Leader Compression, upon my entry to the site. Observed the three compressor engines (two natural gas and one electric), the Natco dehydrator and reboiler, and drip tanks. Only one of the natural gas engines is currently running. Observed no malodors leaving the property, no deviations, and no violations. Ms. Maley will supply me with all plant blowdowns that have occurred in the recent past and will notify me of all blowdowns in the near future.

Consider complaint closed and resolved.

*** End of Report ***