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Oral Testimony on Proposed Plan Approval 26-00588A, Shamrock Compressor Station
New Salem Volunteer Fire Department 11/13/2012

I object to the issuance of Plan Approval 26-00588A on the following grounds:

1. The notice published in the PA Bulletin was deficient for only publishing *increases* to PTE.

The File Review Memo (Memo) contains a complete PTE listing, but this was not published to the public. The PA Bulletin notice for this plan approval should be reissued, with a new public comment period, giving the public the opportunity to review *total* PTE.

2. The application withheld information about violations at Shamrock and other Laurel Mountain Midstream (LMM) / Williams facilities.

The list of associated facilities in the application includes Prah Compressor Station, (DEP site ID 602763), which has had numerous violations, but these were not listed in the application attachment B-3. The dollar amount for the Shamrock violation was listed as \$n/a when in fact this was \$7,000. Williams Field Services Group is shown in the application as 100% owner of Williams' share of LMM but no Williams Field Services facilities are listed under violations. On Thursday, March 29, 2012, the Williams Field Services Lathrop Compressor Station (DEP site ID 729947) *exploded* and caught fire. Williams' own investigation and report on this matter lists human error as the cause, and indicates "retrain all operational workers" as one of its corrective actions. There is no mention of this case in any of the Shamrock 26-00588A materials and DEP has not evaluated whether any Shamrock personnel received this retraining. DEP is aware that proper operation and maintenance of equipment is central to all forms of BAT, and thus in not evaluating this issue DEP has been *negligent*.

3. PTE calculations do not include any margin of error. A mere 2% error in the PTE calculation for NO_x will pass the threshold for Non-Attainment New Source Review (NNSR) Major Source.

Table 13 in Memo (p. 31) lists PTE for NO_x as 98.5 tons per year. The NNSR major source threshold for NO_x is 100. LMM is clearly so nervous about its PTE for NO_x that it has "volunteered" to restrict hours of operation of the existing 6 Caterpillar engines by 25%. This measure is inadequate. Instead, run-time restrictions on the Caterpillar engines should be dropped but LMM should be required to *remove completely* 2 engines. Detailed analysis of aggregate NO_x PTE for Shamrock as a whole, which should occur at page 26 or 27 of Memo, is simply missing. The public can have absolutely *no confidence whatever* that the contention of LMM and DEP that Shamrock is not an NNSR major source for NO_x is correct.

4. There has been no proper analysis of probability of exposure to acute-effect toxic substance disease from the amounts of pollution permitted as Shamrock PTE.

There are widespread accounts of acute-effect health problems of people who live in close proximity to compressor stations which agree with known symptoms of exposure to toxic substance disease. These include the family of Phyllis Carr, who lives in close proximity to the LMM facility Springhill #2 Compressor Station, (DEP site ID 720794), and the family of Pam Judy, who lives near a Greene County compressor station from another operator. Each has testified about their experiences on other occasions. PTE calculations are published as tons per year. Exposure limits for prevention of toxic substance disease are published by such agencies as ATSDR as some number of hours at a given parts per million. Despite numerous public comments on this issue, including at least two by myself, DEP continues to rely on non-peer-reviewed studies from the landfill industry whose coverage of non-chronic toxic substance disease exposure is questionable at best. The Federal Energy Regulatory Commission (FERC) is clearly not impressed with DEP's methodology on this subject. In granting National Fuel Gas a federal certificate of convenience under FERC docket CP11-512, FERC stipulated that

National Fuel Gas should submit a “refined air quality dispersion modeling analysis” for **1-hour** NO₂ exposure. If DEP was doing its job in protecting the public against acute-effect air pollution this stipulation would not be necessary.

There is no analysis of the impact of acute-effect pollution from dehydration of intermittent pockets of wetter than expected gas. There is no actual observational data for how dry incoming gas actually is.

5. The plan approval does not require appropriate BAT for leak detection (FLIR photography).

I raised this very issue myself in a public comment to the prior Plan Approval for Shamrock, 26-00588. DEP’s response was to deny that there had been any finding that FLIR photography is BAT for leak detection. Clearly DEP has changed its mind on this subject: FLIR photography is now explicitly recognized as BAT for leak detection in draft GP-5, section J 2: “At a minimum, the owner or operator of the facility shall on a quarterly basis, use forward looking infrared (“FLIR”) cameras or other approved leak detection monitoring devices approved by the Department for the detection of fugitive leaks.” Where is this language in Plan Approval 26-00588A? FLIR inspection once per quarter **is not often enough**. By not mentioning FLIR inspection at all in 26-00588A, DEP is not following its own guidelines for leak detection BAT.

6. Application submissions of municipal notification are deficient because they refer to public comment periods which were never advertised and did not take place.

There is no submission of actual legal advertisements that show the public was informed of any municipal level public comment periods. In fact there have not been any municipal public comment periods for Shamrock, except for a zoning hearing in which the ultimate size and pollution impacts of Shamrock were not disclosed.