

Huge Atlantic Coast Pipeline Compressor Station Planned for Northampton Co.

Air Quality Hearing November 15, Garysburg Town Hall, 504 Old Highway Rd

Speak out to Protect Health and Safety! Sign up at 5:00 PM, Hearing at 6:00 PM

Send your comments by **November 20th, 2017** to: publiccomments@ncdenr.gov Please include "ACP/DAQ" in subject line. Comments may also be submitted by USPS mail to: Division of Air Quality, Attn: Charles McEachern, 3800 Barrett Drive, Raleigh, N.C., 27609.

What is the Compressor Station that ACP wants to build? A compressor station is an installation of large compressor engines and other equipment used to push gas (mostly methane) along a pipeline, typically for 40 to 70 miles. The proposed Northampton County compressor station would include three large compressors, a total of 22,000 horsepower, and a smaller backup compressor, as well as several very large tanks to hold pipeline liquids and wastes. Remarkably, the compressor stations along the ACP are each expected to push the gas more than 150 miles each, meaning that pressures will be very high near the station, and more compressor stations may be proposed along the pipeline!

Other equipment planned for the compressor station includes: "blowdown" and exhaust "silencers", metering equipment, a pipeline launcher and receiver, filter/separators, and a communications tower. Methane, other dangerous gases and particulates leak at many places from compressor station equipment, so nearby residents are exposed frequently. Sparks can easily ignite fires or explosions; planned and accidental "blowdowns" release large volumes of methane (natural gas), other volatile organic compounds and particulates, dangerous to respiratory and circulatory system health.



Shown above is a large compressor station in Doddridge County, West Virginia, near where the Atlantic Coast Pipeline would begin, observed in 2015 by an NC team visiting to see conditions in a poor county, massively impacted by fracking for gas. Noise from the facility was quite loud for over a mile.

Concerns about Air Quality Permit for Northampton Compressor Station

A review of the permit application shows that DEQ has not obtained some critical information needed to properly regulate this facility, and the permit doesn't take into account the impact of other nearby major polluters.

With all of its compressor engines bigger than 500 horsepower, this should have triggered requirements for more air controls, but the permit only requires the facility's operators "to the extent practical, consistent with good air pollution control practice for minimizing emissions". This is an unenforceable requirement. Initial "performance testing" of the equipment is only required within the first year, then every three years thereafter.

The facility will put more hazardous air pollutants, nitrogen oxides and volatile organic compounds (precursors of ozone, also known as smog), particulate matter, greenhouse gases, and other pollutants into the air that people breathe. All of these pollutants are harmful to people's health. According to an Oct, 2017 study by the Southwest Pennsylvania Environmental Health Project, **every compressor station they studied routinely released large volumes of chemicals associated with a variety of diseases and disorders.** Nearby residents experience higher respiratory, cardiovascular and neurological problems, and they report elevated stress levels due to 24/7 noise.

There is no acknowledgment in the permit of the **impact of total air pollution from major nearby polluting facilities**, including another compressor station in Pleasant Hill with leaking equipment, the Georgia Pacific mill just above the VA border, and the huge Enviva Wood Pellet plant a few miles to the southwest. Regional modelling and increased monitoring **must** be required. Formaldehyde is an irritant and toxic compound released at high levels by compressor stations and wood processing facilities, but there's no clear limit to releases in the permit!

Pollutant emissions like nitrogen oxides and sulfur dioxide are regulated according to the amount of heat input. That is, the more heat used, the greater pollution allowed! There are no monitoring requirements in the permit for Volatile Organic Compounds or Hazardous Air Pollutants. According to the permit application, the Northampton Compressor Station would emit 19.2 tons per year of nitrogen oxides (NOx), 21.2 tons per year of volatile organic compounds (VOC), 18.4 tons per year of particulate matter (PM), nearly 130,000 tons per year of carbon dioxide equivalent emissions (CO₂E), several different hazardous air pollutants, and a significant amount of ammonia.

Dust (particulates) control and odor control would be completely "complaint-driven"—The facility is supposed to avoid causing "substantive complaints", or excessive odors or dust beyond the boundary of the facility. This is unenforceable, and the permit says if there are "substantive complaints" (not defined) or excessive dust outside facility, it MAY be required to submit a dust control plan! **DEQ must require monitoring and a dust control plan that is enforceable.**

Visual emissions, representing particulates, are limited to an average of 20% opacity measured over a 6 minute period, but the monitoring is subjective, allowing excess releases with no reporting.

Given the other polluting facilities close to the proposed Northampton compressor station, and the high percentage of African-American, low-income, and other vulnerable residents, the Department of Environmental Quality **needs more information about the effects of this pollution before it can issue a permit.** The department should require **modeling of the expected air pollution from this facility** and **monitoring of existing, nearby major sources of air pollution.** These steps are necessary to ensure that low-income communities and people of color are not at risk of disproportionate, harmful health effects from the added air pollution from this facility.

Studies cited by the Federal Energy Regulatory Commission in its environmental impact statement found elevated concentrations of dangerous pollutants from samples collected near compressor stations. These include volatile organic compounds, fine particulate matter, and gaseous radon. Some VOCs, such as benzene and formaldehyde, are carcinogens. Those who live near compressor stations have reported a number of symptoms from skin rashes to gastrointestinal, respiratory, and neurological problems.

DAQ regulations consider formaldehyde to be merely an “acute irritant,” despite the fact that it’s also a carcinogen. As a consequence, the Department places a maximum hourly limit for formaldehyde, *but does not regulate total annual exposure from sources such as the Northampton compressor station.* Particularly given the other sources of formaldehyde pollution nearby—another compressor station in Pleasant Hill and the Georgia Pacific Mill—the department should ensure that the community is not going to be exposed to dangerous levels of this known carcinogen on an annual basis. **DAQ must ensure no adverse health effects from this facility, taking into account emissions from other nearby sources.** DAQ has not performed the analysis to make this determination, required before issuing a permit.

The compressor station must be considered a major new source of greenhouse gas pollution, with nearly 130,000 tons per year of carbon dioxide equivalent emissions. Methane is an especially powerful greenhouse gas, at least 86 times more potent than carbon dioxide over a 20 year time frame. Given Governor Roy Cooper’s commitment to combating climate change, as evident by joining the U.S. Climate Alliance, DEQ should update its regulations and subject facilities like the Northampton compressor station to major source permit requirements as the greenhouse gas major source threshold is exceeded.

As required by North Carolina DEQ’s long-standing Environmental Equity policy and its obligations under Title VI of the Civil Rights Act of 1964, DEQ **MUST consider the project’s environmental harms to minority and low-income communities.** The Department’s Environmental Equity Policy recognizes the potential for disproportionate environmental burdens imposed on low-income communities and communities of color. The Northampton compressor station is within a **census block group where 79.2 percent of the population is African American. DEQ must complete a rigorous environmental justice review before it can grant this permit.**

The draft permit would allow emissions of ammonia and other toxic pollutants from equipment that is “exempt”, so DAQ did not perform the necessary analysis to see if these emissions would exceed healthy safety standards in combination with other toxic emitters nearby. DAQ should rescind the draft permit and require the Company to obtain an air toxic permit that fully evaluates the risks to the public.

Given the big remaining questions about risks to human health, climate impacts, and environmental justice, **please ask the Division of Air Quality to DENY this permit and get more information from the ACP, LLC, nearby residents, and other nearby polluters for a new review and comment period!**