

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Bureau of Air Quality
September 8, 2017

SUBJECT: General Conformity Plan Approval Review Memo Addendum
Transcontinental Gas Pipe Line Company, LLC
Lancaster County
Plan Approval 36-001GC

TO: Krishnan Ramamurthy *KR*
Director
Bureau of Air Quality

THROUGH: Chris Trostle *CT*
Chief, Mobile Sources Section
Bureau of Air Quality

FROM: Sean C. Wenrich *SCW*
Chief, New Source Review Section
Bureau of Air Quality

On July 14, 2017, the Department received a plan approval application to memorialize the use of emission reduction credits (ERCs) as offsets for a project in Lancaster County. The ERCs are for nitrogen oxides (NOx), which will be used as offsets for both NOx as an ozone precursor and NOx as a particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}) precursor. The project involves construction activities related to the Atlantic Sunrise pipeline project and must satisfy requirements specified by the Federal Energy Regulatory Commission's (FERC) General Conformity Determination for the project. A notice of intent to issue Plan Approval 36-001GC was published in the *Pennsylvania Bulletin* on July 22, 2017, initiating a 30-day public comment period. For more information on the proposed plan approval, please see the Plan Approval Review Memo dated July 25, 2017. On August 14, 2017, a public hearing was held in Lancaster County to take testimony on the proposed plan approval. For more information, please see the transcript of that public hearing.

The Department received comments from 355 commentators in both written form and oral testimony from the public hearing. Many commentators commented on issues that were outside of the scope of the proposed air quality plan approval public comment period. These commentators generally expressed their opposition to the overall construction of the pipeline. Others provided more specific and detailed comments on various aspects of the overall pipeline construction that, again, were outside the scope of the proposed air quality Plan Approval. Substantive comments included questioning various aspect of the air quality modeling performed and the emission factors used to calculate projected NOx emissions from the project. The Department has determined that the modeling and emission estimations are appropriate for this plan approval application. Please see the comments response document for further information.

No changes to the conditions of the proposed plan approval were made due to comments received. A sentence was added to condition #2 to clarify that NO_x ERCs serve for both an ozone precursor and PM_{2.5} precursor. Neither Transcontinental Gas Pipe Line Company, LLC nor any related parties are in the compliance docket, which would prevent the issuance of this plan approval. All previous violations for this company have been satisfactorily addressed and resolved. Based upon my review of the plan approval application and public comments, I recommend that Plan Approval 36-001GC be issued to Transcontinental Gas Pipe Line Company, LLC to memorialize the use of NO_x ERCs as offsets for the Atlantic Sunrise project located in Lancaster County.