

***Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program
Northeast Regional Office***

*Columbia Gas Transmission, LLC
Easton Compressor Station
Plan Approval 48-00001A*

***Response to Public Testimony
Received at Public Hearing on November 10, 2014***

April 14, 2015

Department of Environmental Protection

www.depweb.state.pa.us

On August 23, 2014, the Department of Environmental Protection (“Department”) published in The Pennsylvania Bulletin a Notice of Intent to Issue Plan Approval No. 48-00001A for Columbia Gas Transmission, LLC (“Columbia”) to modify the Easton Compressor Station in Forks Twp., Northampton County, as described in the Columbia January 17, 2014 Plan Approval Application and supplemental submissions. The proposed Plan Approval authorizes the construction of two (2) Solar Taurus 70 natural gas-fired compressor turbines equipped with Solar’s lean-premixed dry low emissions system (SoLoNOX) to control and reduce NOX emissions during normal operating conditions, a natural gas-fired emergency generator, ancillary heating equipment, and miscellaneous insignificant storage tanks. The turbines will be used to maintain natural gas pressure along the gas pipeline.

A number of comments were received during a 30-day written comment period following publication of the Department’s Notice of Intent to Issue. During that comment period, the Department received requests to conduct a public hearing. On November 10, 2014, the Department held a public hearing at the Easton Area Middle School, 1010 Echo Trail in Easton, PA, concerning proposed Plan Approval No. 48-00001A for the Easton Compressor Station. The hearing was advertised in a local newspaper of general circulation and the Pennsylvania Bulletin.

During the public hearing, representatives from NiSource, Inc., on behalf of Columba Gas Transmission, LLC, and representatives from the Department presented information about the proposed project and listened to comments from the public. Twenty two (22) individuals presented testimony at the public hearing. This document briefly summarizes the testimony presented during the public hearing and provides the Department’s response to relevant comments received. The comments are not intended to be a complete summary of each individual’s testimony; but rather to identify the issue or comment raised and provide the context for the Department’s response. The testimony of each individual was transcribed, is available in its entirety at the Department’s Northeast Regional Office, and may be accessed by any person wishing to review it by scheduling a file review with the Department at (570) 826-2511.

Below are two tables that identify individuals who provided comments on proposed Air Quality Plan Approval No. 48-00001A for the Columbia Gas Transmission, LLC Easton Compressor Station. Table 1 identifies people who presented oral testimony at the public hearing and Table 2 identifies individuals who submitted written comments to the Department. Responses to the comments are provided below the tables.

Table 1. Individuals who presented oral testimony during the public hearing.

	Name	Affiliation	Email Address
1	Gene Hunter	Private Citizen	
2	Greg Lotorto	Private Citizen	
3	Alex Lotorto	Private Citizen	
4	Joe Guest	Private Citizen	
5	Joan Dean	Private Citizen	
6	Beverly Hernandez	LWV NC President	
7	Sheila Gallagher	Private Citizen	
8	Tom Church	Private Citizen	
9	Sam Koplinka-Loehr	Clean Air Council	
10	David Mamrak	Private Citizen	
11	Jonathan Fallos	Private Citizen	
12	Kris Fallos	Private Citizen	
13	Jennifer Young	Private Citizen	

14	Chuck Conroy	Private Citizen	
15	Ken Collins	Private Citizen	
16	Mario Scavello	Private Citizen	
17	Debra Wenhold	Private Citizen	
18	Robert Collins	Private Citizen	
19	Petti Caffrey	Private Citizen	
20	Susan Newhard	Private Citizen	
21	Karen Anderson	Private Citizen	
22	Ed Urban	Private Citizen	

1. Comment: Commenter(s) expressed concern(s) about additional pollution in the area including greenhouse gases. (1, 2, 4, 7, 15, 18)

Response: Pursuant to 25 Pa. Code §§ 127.1 and 127.12(a)(5), Plan approval applicants, including those for minor modifications such as what is being proposed at the Easton facility, are required to show that emissions will be the minimum attainable using best available technology (BAT). Adherence to these BAT requirements, as well as the other requirements in the Plan Approval and applicable state and federal regulations, will help ensure that the modifications at the Easton facility do not have a significant impact on regional air quality. The proposed turbines are new sources subject to the Department’s BAT regulatory requirements. They are efficient units and use a lean-premixed dry low emissions system (SoLoNOX) to reduce nitrogen oxide (“NOx”) emissions.

With regard to greenhouse gases, potential greenhouse gas emissions have been calculated and included in the plan approval application. They do not trigger any additional permitting requirements.

2. Comment: Commenter(s) expressed concerns about health effects from increased emissions associated with the station.(1, 5, 6, 7, 9, 11, 12, 15, 17,18, 19, 20, 21)

Response: Based upon the review of the plan approval application submitted by Columbia for the Easton facility, the final plan approval will contain required emission limitations and operating conditions that will be verified through stack testing and reporting requirements as specified by the appropriate air quality regulations that protect public health. EPA has established National Ambient Air Quality Standards (“NAAQS”) for six principal pollutants, which are called “criteria” pollutants, for the protection of public health and welfare. The six criteria pollutants are carbon monoxide, lead, nitrogen dioxide, ozone, particle pollution, including PM₁₀ and PM_{2.5}, and sulfur dioxide. Primary NAAQS provide public health protection, including protection for the health of “sensitive” populations such as asthmatics, children, and the elderly. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Protection of the NAAQS is maintained, in part, through the Department’s BAT requirements during the permitting process. Plan approval applicants, including those for minor modifications such as what is being proposed at the Easton facility, are required to show that emissions will be the minimum attainable using BAT. Adherence to these BAT requirements, as well as the other requirements in the Plan Approval and applicable state and federal regulations, will help ensure that the modifications at the Easton facility do not have a significant impact on regional air quality and that public health and welfare is protected.

- 3. Comment:** Commentator asked for air monitoring and limits for toxic emissions based on scientific study for the site. (2)

Response: The Department currently has an extensive air monitoring program that not only monitors for criteria pollutants, but also for air toxics and volatile organic compounds (VOCs). The Monitoring Network employs both continuous and discrete methods of monitoring. The continuous monitoring produces hourly pollutant concentrations that are used to calculate various pollutant averages needed used for comparison to NAAQS. Continuous monitoring is performed for ozone, sulfur dioxide, nitrogen dioxide, oxides of nitrogen, carbon monoxide, hydrogen sulfide, PM_{2.5}, and PM₁₀. Non-continuous monitoring is also performed, utilizing discrete sampling. Discrete sampling is performed for PM_{2.5}, PM₁₀ and lead. The Department also performs Air Toxics monitoring, which uses various continuous and discrete sampling methods to monitor for selected toxic air pollutants, including heavy metals, such as mercury and chromium; and VOCs such as benzene, trichloroethylene, and methylene chloride.

As part of its network, the Department performs air monitoring in the areas surrounding the monitoring stations. Ambient air monitoring stations are located in Allentown, Easton, Freemansburg and Nazareth. Those sites together monitor for Ozone, PM₁₀, PM_{2.5}, Sulfur Dioxide, Hydrogen Sulfide, Nitrogen Dioxide, Carbon Monoxide, and VOCs. These stations provide the Department with information on ambient air concentrations of these various pollutants in the areas surrounding the monitoring stations, and allow it to review compliance with the public health and welfare based NAAQS.

Because the general area has monitoring stations, a separate study for this site is not being required or performed. Nevertheless, the information gathered from the Department's ambient Air Monitoring Network in the Allentown-Bethlehem-Easton area, and the source specific information gathered from the emissions testing requirements in the plan approval, will provide reliable emissions information and assist in ensuring compliance with applicable limits and the protection of public health and welfare.

- 4. Comment:** Commenter(s) expressed concern(s) that the company failed to include best available technology ("BAT") and standards in order to prevent toxic emissions in the residential area where this compressor station would be located. (1, 2, 3)

Response: Pursuant to 25 Pa. Code §§ 127.1 and 127.12(a) (5), the proposed turbines are new sources subject to the Department's BAT regulatory requirements. They are efficient units and use a lean-premixed dry low emissions system (SoLoNOX) to reduce nitrogen oxide ("NOx") emissions, which satisfies the Department's BAT requirements. The level of efficiency of the turbines and combustion of pipeline quality dry natural gas will help control emissions, and the Department has included stringent emission limitations and best work practice requirements in the plan approval to ensure that this is the case. The proposed sources are required to be operated and maintained in accordance with good air pollution control practices and minimize emissions to the maximum extent feasible.

In terms of applicable regulatory requirements, the turbines will be subject to the New Source Performance Standards (NSPS), 40 C.F.R. Part 60, Subpart KKKK, for the control of NOx and CO. The emergency generator will be subject to the federal emission standards of 40 C.F.R. Part 63, Subpart ZZZZ, for the control of hazardous air pollutants and New Source Performance Standards 40 C.F.R. Part 60, Subpart JJJJ for the control of hydrocarbons, NOx and CO. These requirements are in addition to other requirements in the Plan Approval.

Therefore, BAT requirements have, in fact, been imposed to ensure that the emission of air pollutants is controlled to the maximum extent consistent with those requirements.

5. **Comment:** Commenter(s) state that the Department must consider the increase in actual emissions that will result from the project. (1, 2, 7, 15)

Response: In evaluating the Plan Approval application the Department reviewed the existing facility's baseline actual emissions compared to the potential emissions of the new sources at the facility. Potential emissions were reported using a conservative assumption that the facility would operate for 8,760 hours per year, which is the total number of hours in one year. Based on that comparison, an increase in actual emissions is predicted; however the emissions will not reach major source thresholds, which are established significant levels of emissions that the EPA defines as major air pollutant emitters. Therefore, this facility will be considered a minor rather than major source of emissions. The facility was previously permitted as a minor source of emissions based on its potential to emit, and will remain classified as a minor source based on potential to emit after proposed modification.

6. **Comment:** Commenter(s) were concerned about venting (blowdowns and rerouting) from the facility. (3, 9)

Response: To protect the public, company personnel and property, all compressor stations are equipped with safety devices. When compressor stations are taken offline for maintenance or the system shuts down for other reasons, the gas within the compressors and associated piping is either manually or automatically vented to the atmosphere. When a vent valve is open, it is typically referred to as a "blowdown." Emergency Shutdown Systems ("ESD's") are also designed to automatically evacuate vapors from sensitive areas during plant emergencies and shutdowns. Because of the required venting, some noise can result from compressor maintenance, activation, or ESD system testing. Whenever practicable, station blowdowns will occur during daylight hours with blowdown gas routed through blowdown silencers. Venting in these limited circumstances is considered to be a safe way to remove gas from the system quickly so that it does not collect and create an ignition danger.

Commenters suggested that Columbia should be required to reroute gas as suggested under the Natural Gas STAR Program, rather than vent gas from the system during emergency shutdowns or when the station is taken off-line. The Natural Gas STAR Program and adherence to its recommendations is voluntary and not mandated by law. Columbia has indicated that it believes its selection of Solar Turbines equipped with dry gas seals are effective at eliminating equipment leaks and maintaining pressurization under certain scenarios, which will help to reduce minor blowdown events and fugitive emissions. The Plan Approval also requires that the turbines be constructed, operated and maintained in accordance with manufacturers' specifications and that Columbia performs adjustments and/or tune-ups as specified by the manufacturer. These measures will help to reduce discharges from the system.

7. **Comment:** Commenter(s) state that Columbia has failed to include the lowest emitting technology in the application by choosing to install natural gas engines rather than electric engines. (2, 9, 15)

Response: With a plan approval application like the Columbia Gas Easton application, the Department does not select the type of source being proposed. Instead, the applicant selects the source and informs the Department, through its Plan Approval application, what it is proposing to install or construct at the site. The Department reviews the application to ensure that applicable regulatory requirements can be met and includes those requirements in the plan approval.

The Department presented this comment to Columbia Gas for their response and the company indicated that the availability and proximity of suitable electric power is a key consideration in choosing to install electric motor driven compression. Columbia utilized the Rextag/GIS database(s) to determine the proximity of mainline electrical transmission lines to the Easton Compressor Station. From this analysis, Columbia concluded that existing mainline electrical transmission lines are of a distance that

would result in infrastructure costs associated with bringing suitable electric service to the Easton Compressor Station that would not justify installation of electric motor driven compression. Choosing electric driven compression, the company said, would require additional environmental impacts associated with construction of the electrical infrastructure to bring power to the Easton Compressor Station.

8. Comment: Commenter(s) concerned about quality of life. (5, 17, 21)

Response: The decision of the Department to issue or deny a plan approval for the construction and operation of air-contamination sources such as those in the proposed project is based on applicable state and federal air quality regulatory requirements. The Department's decision is not predicated on non-air quality issues such as land values, job creation, economic benefit, energy independence, visual impact, grant eligibility or other non-air quality regulatory requirements.

9. Comment: Commenter(s) expressed concerns about odorous emissions coming from this facility. (9, 13, 21)

Response: Pursuant to 25 Pa. Code § 123.31, “[a] person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.” In addition to this being a Department regulation, the Plan Approval for the Easton Compressor Station contains a condition that mirrors this regulation. The company, therefore, is required by regulation and its permit to comply with this restriction on odorous emissions.

10. Comment: Commenter(s) expressed concerns about property values. (7, 17, 21)

Response: Please refer to Response No.8 above.

11. Comment: Commenter(s) expressed concerns about economic & industrial growth. (7, 21)

Response: Please refer to Response No.8 above.

12. Comment: Commenter(s) expressed concerns about explosions and emergency plans. (8, 12)

Response: NiSource/Columbia Gas has response plans for all of its compressor stations, the Easton facility included. Columbia Gas has safety equipment in place to minimize the chance for any explosions.

13. Comment: Commenter(s) expressed concerns about accurate emissions limitations for criteria pollutants. (9)

Response: The facility will be required to meet accurate emission limits for a wide range of pollutants that are listed in the plan approval. Please refer to Section E, Condition #005, of the Plan Approval.

14. Comment: Commenter(s) asked for daily limits for emissions in the permit. (9, 15)

Response: The proposed Plan Approval contains hourly and yearly emissions limitations for wide range of pollutants from each turbine. By including hourly and yearly emission limitations, the Department has included both short term and long term emission limits, which the Department has determined are appropriate for this type of project and these sources.

15. Comment: Commenter(s) expressed concerns over noise from the compressor station and the preservation of quiet in the community. (1, 9, 13)

Response: Noise is often regulated at the local level through noise ordinances. Therefore, in consideration of the concern regarding this issue, the Department has included a condition in the Plan Approval stating: “Nothing in this Plan Approval relieves the facility owner or operator from its obligations to comply with all applicable federal, state and local laws and regulations.” This would include local ordinances pertaining to noise.

16. Comment: Commentator (s) asks whether the company is using the latest technology to minimize the raw gas conditions during the start and stop sequence. The Department interprets this as a comment expressing concern over gas leaks from the system. (14)

Response: The proposed Solar Turbines will be equipped with dry gas seals, which are much more effective at eliminating equipment leaks and maintaining pressurization under certain scenarios. This will assist in reducing minor blowdown events and fugitive emissions. In addition, the Plan Approval contains conditions requiring the company to develop leak detection and repair (“LDAR”) program and perform LDAR monitoring. The LDAR monitoring must be conducted on each pump, valve, relief valve, flange, connector, storage vessel/storage tank, open ended line and compressor seal, if applicable, in natural gas or hydrocarbon liquids service on at least an annual basis using an optical gas imaging camera such as a FLIR camera or a gas leak detector capable of reading methane concentrations in air of 0% to 5% with an accuracy of +/- 0.2%. Any leaks detected must be repaired no later than 15 calendar days after a leak is detected, unless facility shutdowns or ordering of replacement parts is necessary for repair of the leak(s). Further, the source must, at a minimum, on a monthly basis, perform audible, visual, and olfactory inspections to detect leaks from the equipment listed. The source must maintain records of all inspections and leak repairs.

17. Comment: Commenters expressed concerns about potential contamination of local water. (19)

Response: To guard against leaks and protect groundwater, the above ground storage tanks proposed are double-walled. The site will also be equipped with a septic system. The Department does not anticipate or expect there to be groundwater impact issues associated with the facility.

Table 2. Individuals who submitted written comments in the form of emails and letters during comment period.

	Name	Affiliation	Email Address
1.	Adrienne Panuski	Private Citizen	purpleabe@hotmail.com
2.	A Todd	Private Citizen	
3.	Alex Vollmer	Private Citizen	
4.	Alex Bomstein	Private Citizen	klex123@yahoo.com
5.	Alex Lotorto	Private Citizen	alotorto@gmail.com
6.	Alexander Dalton	Private Citizen	Alexander.dalton@live.longwoo.edu
7.	Alice Orrichio	Private Citizen	Aorrichio@gmail.com
8.	Amanda Scavron	Private Citizen	ascavron@rcn.com
9.	Andrew Katsetos	Private Citizen	solitarygoat@gmail.com
10.	Andrew McGrath	Private Citizen	Comcas@andrewmcgrath.com
11.	Andrew Perron	Private Citizen	
12.	Anthony Montapert	Private Citizen	
13.	Anita Brosky	Private Citizen	
14.	Anna Will	Private Citizen	annabwill@gmail.com

15.	Anne Bonn	Private Citizen	chanib1@verizon.net
16.	Annelise Ekland	Private Citizen	
17.	Arianne Elinich	Private Citizen	aaarianne@hotmail.com
18.	Armen Elliott	Private Citizen	armenphoto@verizon.net
19.	Arnold Ruiz	Private Citizen	
20.	Audrey Gozdiskowski	Private Citizen	goz@epix.net
21.	Bambi Hanson	Private Citizen	bambihanson@gmail.com
22.	Barbara Clifford	Private Citizen	Bclifford49@gmail.com
23.	Barbara Espesito	Private Citizen	Written Comment
24.	Barbara H Seiple	Private Citizen	Bhseiple8@gmail.com
25.	Barbara Irons	Private Citizen	ironbarb43@yahoo.com
26.	Barbara J Spiegelberg	Private Citizen	mediate@epix.net
27.	Barbara Moore	Private Citizen	msgemstone@att.net
28.	Barbara Sullivan	Private Citizen	barbara808@flash.net
29.	Barbara Swartz	Private Citizen	baswartz23@gmail.com
30.	Barbara VanHorn	Private Citizen	bvhbarb@pa.net
31.	Ben Badger	Private Citizen	
32.	Benita J. Campbell	Private Citizen	b_j_campbell@yahoo.com
33.	Beth Dzwil	Private Citizen	bdzwil@aol.com
34.	Beth Seetch	Private Citizen	
35.	Bev Fraim	Private Citizen	bevtoolady@epix.net
36.	Beverly Hernandez	Private Citizen	lwvnorthco@yahoo.com
37.	Beverly Moranski	Private Citizen	moosecorvette@aol.com
38.	Bill Cook	Private Citizen	cook6658@yahoo.com
39.	Bill Deutschlander	Private Citizen	billastt@gmail.com
40.	Bob Vaughan	Private Citizen	vaughanbob@ymail.com
41.	Bob Hamburg	Private Citizen	
42.	Bonnie Craig	Private Citizen	getsharkware@aol.com
43.	Bonnie Rissmiller	Private Citizen	therissmillers@verizon.net
44.	Brad Walrod	Private Citizen	brad@kenozatype.com
45.	Bradley L. Stout	Private Citizen	Written Comment
46.	Brian Fink	Private Citizen	bfink@prodigy.net
47.	Bruce Moyer	Private Citizen	bhmoyer@yahoo.com
48.	Bruce Perry	Private Citizen	intermixdesign@att.net
49.	Cara Meglio	Private Citizen	cara.meglio@gmail.com
50.	Carl Arnold	Private Citizen	
51.	Carl Righter	Private Citizen	handeman@msn.com
52.	Carla Babrick	Private Citizen	
53.	Carol Cutler	Private Citizen	carolcutler3@msn.com
54.	Carole A Stanko	Private Citizen	Written Comment
55.	Carolin Schellhorn	Private Citizen	schellho@sju.edu
56.	Caroline McCrea	Private Citizen	

57.	Catherine Smith	Private Citizen	catheris@mindspring.com
58.	Catherine Hunt	Private Citizen	
59.	Chad Hayes	Private Citizen	chayes58@hotmail.com
60.	Chara Armon	Private Citizen	chara.armon@gmail.com
61.	Charles Price	Private Citizen	
62.	Charled Kaprelian	Private Citizen	Ckaprellian517@comcast.net
63.	Charles Morgan	Private Citizen	cemorgan75831@yahoo.com
64.	Charlotte Fremaux	Private Citizen	cmfremaux@gmail.com
65.	Chelsea Ardle	Private Citizen	cardle08@gmail.com
66.	Cheryl Dzubak	Private Citizen	cadzubak@optimum.net
67.	Christian Hartleben	Private Citizen	prophit1970@gmail.com
68.	Christopher Walker	Private Citizen	amrak63@outlook.com
69.	Clark Sharlock	Private Citizen	getyoursharkware@aol.com
70.	Colleen Hamilton	Private Citizen	liza72@earthlink.net
71.	Collin Rees	Private Citizen	collirees@gmail.com
72.	Cyndie Dutkiewicz	Private Citizen	
73.	Dan Allard	Private Citizen	dallard9@gmail.com
74.	Dan Cush	Private Citizen	naha1111marti@comcast.net
75.	Dan Piser	Private Citizen	dpiser@gmail.com
76.	Daniel Beck	Private Citizen	
77.	David Barlup	Private Citizen	pumafeet10@yahoo.com
78.	Dniel Steniberg	Private Citizen	
79.	David Batt	Private Citizen	
80.	David Soares	Private Citizen	
81.	David LaVerne	Private Citizen	backpack2@comcast.net
82.	David Spangenberg	Private Citizen	
83.	David Wilson	Private Citizen	Wilsonrdavid@yahoo.com
84.	Daryl Ezzo	Private Citizen	
85.	Dawn Kenyon	Private Citizen	
86.	Deb and Arne Arnason	Private Citizen	diamondteldeb@aol.com
87.	Debbie Lambert	Private Citizen	debbiezlambert@gmail.com
88.	Debra Borowiec	Private Citizen	dsborowiec@aol.com
89.	Delaware Rriverkeeper Network	Private Citizen	Written Comment
90.	Deven matlick	Private Citizen	
91.	Dennis Paluselli	Private Citizen	dapaluselli@yahoo.com
92.	Diane Hartford	Private Citizen	dianehartford@aol.com
93.	Diane Karasevicz	Private Citizen	diatom02@yahoo.com
94.	Dianne Arnold	Private Citizen	diarnold@consolidated.net
95.	Dianne Sefcik	Private Citizen	zandjr2d@gmail.com
96.	Donna Browne	Private Citizen	
97.	Donna Eldridge	Private Citizen	donnae63@optonline.net

98.	Donna Maloney	Private Citizen	buddhajane11@yahoo.com
99.	Donna Reppert	Private Citizen	donnarep@aol.com
100.	Dominica Lo Bianco	Private Citizen	
101.	Donald Stevens	Private Citizen	
102.	Dorene Pasekoff	Private Citizen	alliums@yahoo.com
103.	Dorothy Dunlap	Private Citizen	weednbead@aol.com
104.	Doug Rawling	Private Citizen	adrawling@gmail.com
105.	Dr. Alexander Henrich	Private Citizen	
106.	Dr Bob Allen	Private Citizen	lhadd@aol.com
107.	Dr. Alicia Pagano	Private Citizen	apagano29@yahoo.com
108.	Dr. Patricia Salvador	Private Citizen	
109.	E C Yarter	Private Citizen	ecyarter@mindspring.com
110.	Edward Chute	Private Citizen	ejchute@hotmail.com
111.	Edward George	Private Citizen	edbillgeorge@yahoo.com
112.	Edward Rengers	Private Citizen	
113.	Elaine Becker	Private Citizen	elainebecker@yahoo.com
114.	Eleanor Schwank	Private Citizen	
115.	Elizabeth Roedell	Private Citizen	Pewter3@gmail.com
116.	Elizabeth Urban	Private Citizen	lizurban100@gmail.com
117.	Elliot Ross	Private Citizen	kross@nep.net
118.	Emily Lubahn	Private Citizen	elubahn@gmail.com
119.	Eric Durante	Private Citizen	ericdurante@gmail.com
120.	Eric Pape	Private Citizen	papeeric@hotmail.com
121.	Eric Ruth	Private Citizen	ericjruth@gmail.com
122.	Fran Harkins	Private Citizen	Franceseh@aol.com
123.	Frank Asturino	Private Citizen	
124.	Fred Kathi	Private Citizen	
125.	Frank Kohn	Private Citizen	frank.j.kohn@gmail.com
126.	Garr Sanders	Private Citizen	
127.	Gary Sharlock	Private Citizen	LuvBiketrial@aol.com
128.	Gary Hull	Private Citizen	
129.	Gayle Funk	Private Citizen	
130.	Gene lane	Private Citizen	genelane33@yahoo.com
131.	George Harrington	Private Citizen	
132.	Gerritt and Elizabeth Baker-Smith	Private Citizen	egbakersmith@gmail.com
133.	Gregory Pais	Private Citizen	
134.	Gertrude Glazer	Private Citizen	freerangemusic@yahoo.com
135.	Ginger Hill	Private Citizen	glhendersonville@yahoo.com
136.	Greg Lotorto	Private Citizen	lotorto@ptd.net
137.	Gyal Funk	Private Citizen	Written Comment
138.	Gwen Chute	Private Citizen	gwenchute42@me.com

139.	Gwenn Meltzer	Private Citizen	
140.	Heather Hunter	Private Citizen	crickethunter@dejazzd.com
141.	Hennah Wood	Private Citizen	
142.	Hans van Huijkelom	Private Citizen	
143.	Henry and Elaine Frank	Private Citizen	henrynco@comcast.net
144.	Henry Berkowitz	Private Citizen	
145.	J.M. Lavassaur	Private Citizen	
146.	J.T Smith	Private Citizen	Ace910046sca1@hotmail.com
147.	Jack Miller	Private Citizen	jmiller1018@yahoo.com
148.	Jack Rubinsohn	Private Citizen	rustyr96@erols.com
149.	Jackie Wilson	Private Citizen	geminijlw@verizon.net
150.	Jacqueline Crown	Private Citizen	jacquicrown@yahoo.com
151.	James Melloh	Private Citizen	jmelloh@roadrunner.com
152.	Janet Cavallo	Private Citizen	squirrelbuddy@aol.com
153.	Janice Hallman	Private Citizen	
154.	Jason Burch	Private Citizen	jasontburch@yahoo.com
155.	Jason Chastain	Private Citizen	
156.	Jason Kemple	Private Citizen	
157.	Jason Walters	Private Citizen	
158.	Jean Friday	Private Citizen	ejfriday@atlanticbb.net
159.	Jean Kozel	Private Citizen	jkozel@comcast.net
160.	Jean MacFarlane	Private Citizen	maxinemac@yahoo.com
161.	Jeff Sasin	Private Citizen	
162.	Jeffrey Hotz	Private Citizen	concernedpacitizen2014@gmail.com
163.	Jeffrey Jenkins	Private Citizen	
164.	Jeffrey Shralow	Private Citizen	jeffresh@gmail.com
165.	Jeffrey Shuben	Private Citizen	jeffreyshuben@yahoo.com
166.	Jennifer Swann	Private Citizen	
167.	Jennifer Young	Private Citizen	Jennifer@Jyoungteam.com
168.	Jennifer Tobin	Private Citizen	
169.	Jennifer Toth	Private Citizen	
170.	Jennifer Venar	Private Citizen	
171.	Jenny Hartman	Private Citizen	
172.	Jerry Yeager	Private Citizen	jerrylyeager@yahoo.com
173.	Jessica Bellas	Private Citizen	
174.	Jessica Cohen	Private Citizen	asatess@pa.net
175.	Jessica Dell	Private Citizen	jsscdell@yahpp.com
176.	Jessica Walcott	Private Citizen	walcott29@verizon.net
177.	Jim Black	Private Citizen	jim.black@consultant.com
178.	Jim Cummings	Private Citizen	jimcummings@gmail.com
179.	JK Kibler	Private Citizen	Jfishy2578@yahoo.com
180.	Jo Anne Buchanan	Private Citizen	Jo_anne_buchanan@yahoo.com

181.	Joann Ramos	Private Citizen	joannspa@yahoo.com
182.	JoAnn Williams	Private Citizen	jwsewn@gmail.com
183.	Joanne Corey	Private Citizen	jcorey@stny.rr.com
184.	Joe C	Private Citizen	ilraptor@yahoo.com
185.	Joe Guest	Private Citizen	joecguest@gmail.com
186.	Joel Platt	Private Citizen	joelplat@yahoo.com
187.	John Atherton	Private Citizen	walteratherton@gmail.com
188.	John Dierig	Private Citizen	jmdierig@hotmail.com
189.	John Grillo	Private Citizen	
190.	John Palmer	Private Citizen	
191.	John S Sonin	Private Citizen	
192.	John Schooley	Private Citizen	
193.	John V Cornell	Private Citizen	Jcornell@forkstownship.org
194.	John Walsh	Private Citizen	
195.	Jon Lattin	Private Citizen	jon-lattin@corrosion-tech.com
196.	Jon Longsworth	Private Citizen	jjon@longsworth.com
197.	Jon Nadle	Private Citizen	jnadle@aol.com
198.	Jonathan Boyne	Private Citizen	boyne@hawaii.edu
199.	Joseph Bridy	Private Citizen	josephbridy@aol.com
200.	Joseph Guzman	Private Citizen	
201.	Joseph Mercurio	Private Citizen	songbird538@gmail.com
202.	Joseph Wenzel	Private Citizen	josephwenzel@msn.com
203.	Junita Hull	Private Citizen	
204.	Judi Poulson	Private Citizen	
205.	Judith Max	Private Citizen	judithmax@gmail.com
206.	Judith Wertlet	Private Citizen	
207.	Judy Scriptunas	Private Citizen	script@embarqmail.com
208.	Julia Crislip	Private Citizen	crislipj@hotmail.com
209.	Julia Rolf	Private Citizen	Jjulia.behar@gmail.com
210.	Julia Stone	Private Citizen	juliaelizabethstone@gmail.com
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The following comments and responses are directed at the commenters listed under Table 2, numbers 1-423. Many of the written comments that the Department received were form letters that cited a number of the same concerns. These concerns, as well as some additional concerns that were identified in written comments, are responded to below.

18. Comment: The draft plan approval includes emission limitations based only on the two Taurus 70 turbines, even though the company stated in their application that there would be other

pollution sources at the facility including another Waukesha compressor engine that is not discussed in the plan approval.

Response: Plan Approval 48-00001A is only for new sources installed at the facility; therefore it includes emission limitations for two new Taurus 70 turbines. The existing compressor engine will continue to operate under the Station's current State Only Operating Permit #48-00001. The proposed new sources will be incorporated into the operating permit following completion of construction, shakedown and the Department's inspection to ensure that they are installed and operating in accordance with the plan approval. Once incorporated, the State Only Operating Permit will contain emission limits for both the new and existing sources.

19. Comment: Columbia stated they would operate the turbines on a "low-load" setting. Basing the potential to emit limitations on low-load settings does not include the actual potential for this facility to emit, but is instead based on a specific scenario that may or may not occur.

Response: Compressor loads will be shifted periodically, but the turbines will not be operated on a low-load setting, which is defined as a turbine load below 50% of maximum load. To address this comment, the Department has included a condition in the plan approval requiring that the turbines not be operated under low-load settings at any time except during startup and shutdown (See condition No. 010, Section E). Startup and shutdown may not exceed 30 minutes in duration (See condition No. 001, Section E). Condition No. 001, Section E requires the company to meet emissions limitations during normal operation, which is defined as turbine load of 50% to 100 % of max load.

20. Comment: Columbia itself states that electric compressors are an industry best practice that they use at their compressor stations. Electric compressors were not included in this application even though they would drastically reduce local air pollution from this facility, if approved.

Response: Please refer to response No.7.

21. Comment: Columbia has not provided a land use plan to either Forks Township or the DEP for this facility. In Columbia's application to the Federal Energy Regulatory Commission, the company stated the new station would extend beyond the fence line of the current facility. As such, the DEP should require Columbia to submit a land use plan as construction will dramatically increase the size, function, and footprint of the facility.

Response: The Department does not typically require the submittal of a land use plan, but requires the applicant to notify the county and municipality that have planning to assure their project is in conformance with local land use planning or zoning requirements. The Department also encourages applicants to submit to the Department copies of local land use approvals or other evidence of compliance with comprehensive plans and zoning ordinances. The Department's consideration of land use applies to certain authorizations, which in the context of Air Quality includes certain air quality permit applications for sources or facilities *outside of an existing permitted area* (See Appendix A to DEP's Policy for Consideration of Local Comprehensive Plans and Zoning Ordinances in DEP Review of Authorizations for Facilities and Infrastructure (Land Use Policy)). The proposed changes to the Easton Compressor Station will be performed at a facility that has already been permitted under an air quality permit. The Department previously issued a permit for "air contamination sources" (35 P.S. § 4003 and 25 Pa. Code § 121.1) at the "facility" (25 Pa. Code § 121.1). The sources permitted under this new plan approval will be located on the same property. Therefore, Columbia is not proposing to construct new sources outside of the existing permitted area and the Department's Land Use Policy does not apply. Moreover, the Department's understanding is that Columbia Gas has submitted requested land use information to Forks Township and that the Township is not raising any additional land use

concerns. The Department also understands that Northampton County is not raising any land use concerns associated with the proposed construction at the facility.

Nevertheless, in consideration of this concern, the Department has included a condition in the Plan Approval stating: “Nothing in this Plan Approval relieves the facility owner or operator from its obligations to comply with all applicable federal, state and local laws and regulations,” which would include any land use requirements.

22. Comment: There is no plan to ensure that during blowdown events, nearby residents would not experience malodors. The Department should also not permit work on the compressor station to proceed until the facility ceases to violate the malodor requirements of its existing permit.

Response: Please refer to response No. 9 above. In addition, the Department has not confirmed any malodor violations at the existing Easton Compressor Station.

23. Comment: Columbia has, as of yet, failed to show documentation detailing the nature of the proposed hazardous materials storage tanks on site, including the potential emissions from venting as well as how the materials will be tended, transported, and disposed of.

Response: Storage tanks at the Station include wastewater, lube oil, and pipeline liquids (condensate) less than 2,000 gallons in capacity. Such tanks are considered to be sources of minor significance and exempt from plan approval requirements.

The pipeline condensate will be collected periodically and loaded by sealed hose into a tank truck and taken offsite for either proper disposal or to be sold as a pipeline liquid. The waste water tank will likewise be off-loaded into a tank truck via closed hose system and disposed of off-site at a facility that is appropriate for the particular contents from the tank.

Both tanks will be double-walled tanks that eliminate the need for secondary containment and meet all applicable regulatory requirements. No other liquids will be stored onsite and none will be disposed of at the compressor station site.

24. Comment: Please rethink your approval of this seriously unnecessary and flawed project. You risk the health of the community as well as the suppression of the use of renewable energy sources. This is bad for this community and bad for the rest of the world.

Response: The Department reviews the information submitted in the application and makes its decision based on the technical analysis and applicable state and federal regulations. Based upon the information submitted in the application, the Department has concluded that the proposed facility meets applicable state and federal regulations and requirements. Any decision by the Department to deny a plan approval application must have a sound basis that is legally defensible; otherwise it may be subject to a successful challenge by the applicant.

25. Comment: Pipelines have PROVEN to be problematic, and when they carry flammable liquids and high-pressure gases the danger is even greater. We don't need it - we need CLEAN energy.

Response: As stated in response to comment No. 24 above, the Department reviews an application for a proposed project for compliance with applicable legal requirements. If the requirements are met, there is no basis to deny the application and a plan approval is issued. Currently, there is an existing compressor station and high-pressure gas at the site. This is not an entirely new use for the site, but rather may be considered a change to an existing use. To the extent the comment raises concerns about

emergency plans and situations; the Department refers the commenter to its response to comment No. 12 above.

26. Comment: Commentator(s) ask how DEP can verify that the compressor Station would not violate the National Ambient Air Quality Standards.

Response: See response to comments 2 and 3.

27. Comment: Commenter(s) concerned about possible PCB's

Response: As is the case at the existing Easton Compressor Station, the proposed equipment at the modified facility will combust only pipeline quality natural gas which has inherently low emissions of any regulated air pollutant. There are not expected to be PCB air emissions from any of the sources in the Plan Approval. With regard to the presence of any existing PCBs in soils at the site, the Department's records show that the Easton Compressor Station was assessed for PCBs and other parameters in 2000 and PCB concentrations were not found to be in excess of the appropriate statewide health standards. Site characterization reports are on file in the Department's Northeast Regional Office in Wilkes-Barre and are available for review.

The Department received some additional comments that address issues that are not within the scope of the air quality permitting process. Those comments were reviewed but are not addressed in this comment response document as part of the plan approval application review.

FINAL DETERMINATION

Pursuant to 25 Pa. Code Chapter 127, all comments submitted during the public hearing have been reviewed and are appropriately addressed in this document. It is the determination of the Department that, after consideration of all comments received and revisions to the proposed Plan Approval, the available information indicates Columbia Gas Transmission, LLC's proposed construction of two (2) Solar Model Taurus 70 natural gas fired compressor turbines equipped with Solar's lean-premixed dry low emissions system (SoLoNOX) at the proposed Easton Compressor Station, located in Forks Township, Northampton County, will meet the emission limitations and the conditions set forth in the Plan Approval and will comply with all applicable State and Federal air quality regulatory requirements.

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