



13 July 2017

Chris Trostle
Mobile Sources Section Chief
Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street | Harrisburg, PA 17101

TRANSCO PIPELINE

2800 Post Oak Boulevard (77056)
P.O. Box 1396
Houston, TX 77251-1396
713-215-2000

**Re: Emission Reduction Credits Plan Approval
Atlantic Sunrise Project Construction, Lancaster County, Pennsylvania
Transcontinental Gas Pipeline Company, LLC
Source of ERCs to Satisfy General Conformity Determination**

Dear Mr. Trostle:

In reference to your request to clarify the source of the emission reduction credits (ERCs) used to satisfy the emission offset requirements for pipeline construction in Lancaster County for the Atlantic Sunrise (ASR) Project, attached you will find the May 12, 2017 email correspondence and an updated "Figure 1" from the "Air Quality Technical Report" which includes the source of the ERCs from Harford County, MD. Please note these documents are included in the plan approval application submitted to the Department on July 11, 2017, and can be found at the end of Appendix C of the application (pages 359-361 of the application PDF file).

As noted in our correspondence, the location of the retired emission reduction credits in Harford County is acceptable for the offsetting of the construction emissions for the ASR Pipeline Project. The Harford County ERCs originated from a source that is closer in proximity to Lancaster County than Howard County. Additionally the source of the Harford County ERCs is within the previously approved HYSPLIT trajectories. Due to the length of time needed for Maryland to register the ERCs that were generated in Howard County, Transco decided to purchase ERCs that were already in the Maryland ERCs registry from a source located in Harford County. Per the Department's concern regarding additional ERC availability, please be aware that there is an adequate supply of ERCs from the same source in the event additional ERCs are needed.

If you have any questions regarding this submittal or require additional information, please feel free to contact me at (713) 215-2202 or by email at Jaymie.Archer@williams.com.

Sincerely,

A handwritten signature in blue ink that reads "Jaymie Archer".

Jaymie Archer
Sr. Environmental Scientist – Air Quality
Enclosures

Jeannie Woodruff

From: Jeannie Woodruff <jeannie.woodruff@erm.com>
Sent: Friday, May 12, 2017 2:57 PM
To: Trostle, Chris
Cc: Archer, Jaymie (Jaymie.Archer@williams.com); Reiley, Robert A.; Ramamurthy, Krishnan; Dalal, Kirit; Trowbridge, Brian; Wenrich, Sean
Subject: RE: Williams Source of NOx ERCs

Thank you Chris! There are additional ERCs available in the event the actual emissions from construction are in excess of estimates.

Have a good weekend
Jeannie

Jeannie Woodruff

Account Director

ERM
1159 Pittsford-Victor Road, Suite 200 | Pittsford, NY 14534
M 570-418-0339
E jeannie.woodruff@erm.com | **W** www.erm.com



ERM *The business of sustainability*

From: Trostle, Chris [mailto:dtrostle@pa.gov]
Sent: Friday, May 12, 2017 2:55 PM
To: Jeannie Woodruff
Cc: Archer, Jaymie (Jaymie.Archer@williams.com); Reiley, Robert A.; Ramamurthy, Krishnan; Dalal, Kirit; Trowbridge, Brian; Wenrich, Sean
Subject: RE: Williams Source of NOx ERCs

Hello Jeannie,

The location of the retired emission reduction credits I believe are acceptable for the offsetting of the ASR Pipeline Project. They are closer to Lancaster County than the Howard County ERCs that were planned for retirement, and the location is within the HYSPLIT trajectories. I believe that we voiced concerns at our meeting about Williams having enough ERCs in case the project is extended and more emissions were produced. It looks like more ERCs are available from the source, if needed. I hope that more are available in case some unforeseen circumstance arises that would extend construction and elevate emissions.

Chris Trostle | Mobile Sources Section Chief
Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street | Harrisburg, PA 17101
Phone: 717.772.3926

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From: Jeannie Woodruff [<mailto:Jeannie.Woodruff@erm.com>]
Sent: Friday, May 12, 2017 2:30 PM
To: Trostle, Chris <dtrostle@pa.gov>
Cc: Archer, Jaymie (Jaymie.Archer@williams.com) <Jaymie.Archer@williams.com>
Subject: Williams Source of NOx ERCs

Hi Chris

Per our conversation, attached is a revised Figure 1 to the HYSPLIT/VADEQ modeling analysis (also attached for your reference). The revised figure includes a pin at the source of the 106 tons of NOx ERCs that Williams intends to procure to satisfy the emissions offset requirement for the Lancaster County general conformity determination. I've also included the ERC source information copied from the MDE website below.

Identified NOx ERC Source in Harford County MD

Owner	Amount (Tons)	ERC Expiration Date	ERC Source	ERC Contact Information
Harford County Resource Recovery Facility	VOC: NO _x : 273 SO ₂ : 33 PM _{2.5} :	3/25/2026	Permit #: 025-0212 Company Name: Harford County Resource Recovery Facility Jurisdictions: Harford	Mr. Chris Skaggs Phone: 410-333-2730 Mailing Address: 100 S. Charles Street, Tower II, Suite 403 Baltimore MD 21201-2705

We wanted to confirm with the Department that the Harford County MD ERCs are acceptable for use in Lancaster County.

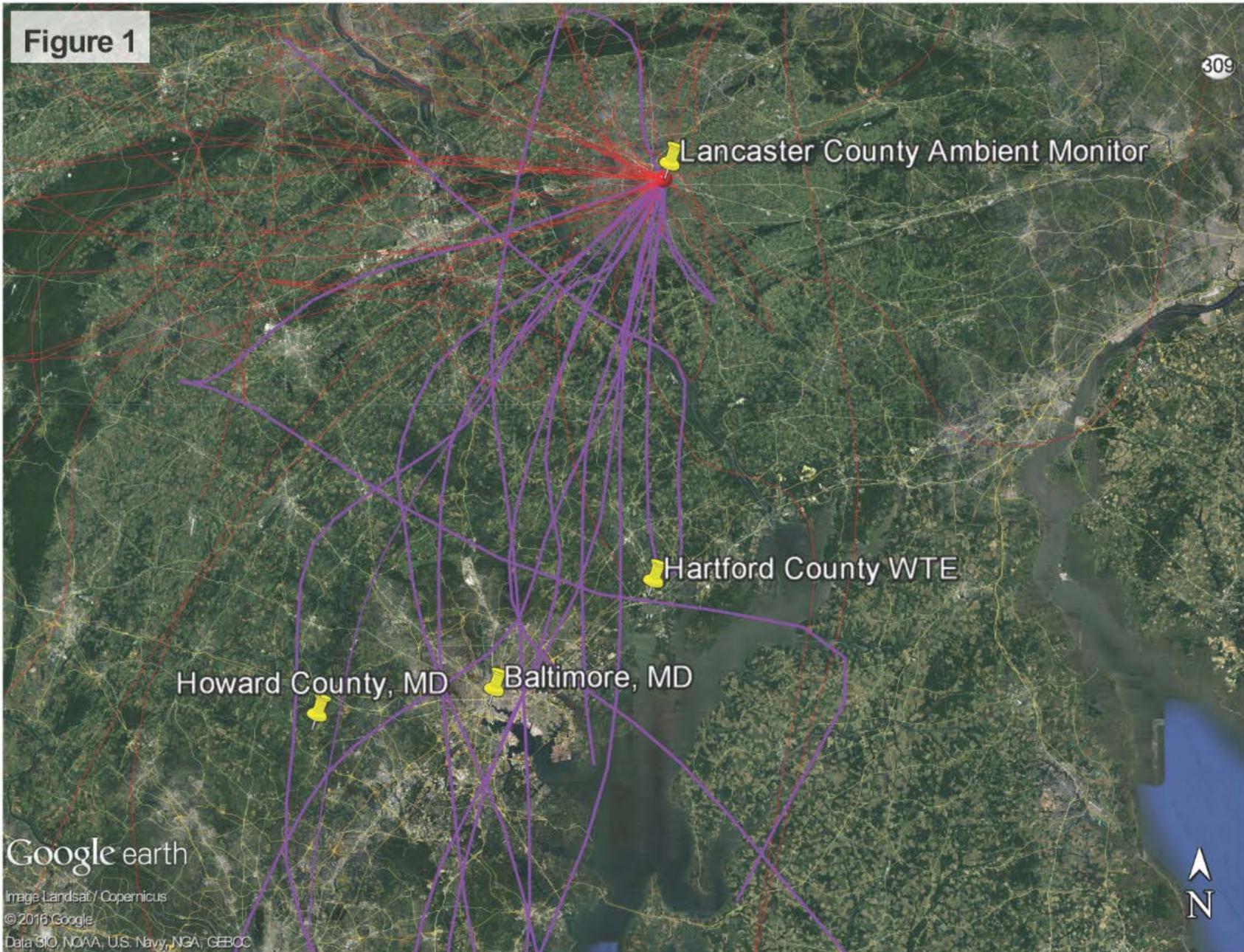
Thank you for your help!
Jeannie

Jeannie Woodruff

Account Director

ERM
1159 Pittsford-Victor Road, Suite 200 | Pittsford, NY 14534
M 570-418-0339
E jeannie.woodruff@erm.com | **W** www.erm.com

Figure 1



Google earth

Image Landsat/ Copernicus
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