



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

Bureau of Air Quality

AIR QUALITY PLAN APPROVAL

TRANSFER AND USE OF EMISSION REDUCTION CREDITS TO MEET GENERAL CONFORMITY REQUIREMENTS FOR THE ATLANTIC SUNRISE PIPELINE PROJECT IN LANCASTER COUNTY

Comment and Response Document

SEPTEMBER 8, 2017

On July 14, 2017, the Pennsylvania Department of Environmental Protection (“DEP” or “Department”) received a plan approval application to memorialize the use of emission reduction credits (“ERCs”) as offsets for a project in Lancaster County. 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. The project covers eight municipalities in Lancaster County, all of which have been appropriately notified.

The Atlantic Sunrise Project (Project) being undertaken by Transcontinental Gas Pipeline Company, LLC (“Transco”) and Williams Companies (“Williams”) is an expansion of an existing interstate natural gas transmission pipeline system that will enable Transco to provide 1.7 million dekatherms per day of incremental firm transportation of natural gas from the Marcellus Shale production areas in northern Pennsylvania to its existing market areas. The Project includes modifications to the existing Transco Mainline system to reverse the direction of flow, enabling new north-to-south capabilities (multi- and/or bi-directional flow) to transport product from this new source of natural gas to existing markets.

This plan approval is solely for the purpose of memorializing the use of ERCs as offsets as required by General Conformity. There are no stationary air contaminant sources associated with this project. Requirements such as Best Available Technology, New Source Performance Standards), National Emission Standards for Hazardous Air Pollutants, Prevention of Significant Deterioration, or Nonattainment New Source Review are not applicable in this case. Pursuant to 25 Pa. Code § 127.208(2), the use of ERCs as offsets are required to be granted in a plan approval or operating permit. A plan approval was chosen as the appropriate mechanism since there will be no operating permit associated with this project.

General Conformity requirements are promulgated at 40 CFR Part 93, Subpart B (relating to determining conformity of general Federal actions to state or Federal implementation plans) and adopted and incorporated by reference in their entirety in the Pennsylvania Code at 25 Pa. Code Chapter 127, Subchapter J (relating to general conformity), Section 127.802. The General Conformity Rule ensures that federal actions conform to Pennsylvania’s State Implementation Plans (SIP) that ensure compliance with the National Ambient Air Quality Standards (NAAQS).

DEP’s proposed air quality plan approval provides a federally enforceable instrument for Transco, DEP, the U.S. Environmental Protection Agency (“EPA”) and FERC to comply with multiple components of federal and Pennsylvania regulations to fulfill Clean Air Act requirements. These regulations include General Conformity and the acquisition, transfer and use of ERCs to demonstrate General Conformity. Under Section 176(c)(4) of the Clean Air Act, the General Conformity rule requires federal agencies to work with states in a nonattainment or maintenance area to ensure that federal actions conform to the air quality plans established in the applicable SIP. The ERCs issued in this case ensure that FERC’s approval of the Transco project conforms with the applicable SIP for Lancaster County.

The Atlantic Sunrise Pipeline project construction activities exceed the 100 ton per calendar year applicability rate threshold of emissions for oxides of nitrogen (NOx) as described in 40 CFR § 93.153(b). When the estimated emissions for a project exceed the applicability rate,

General Conformity requires that all direct and indirect project emissions be mitigated or offset to ensure that a project in a nonattainment or maintenance area for the NAAQS conforms to the (SIP) and that air quality is not adversely affected.

The temporary construction emissions estimates from the Project indicate that the Project triggers the General Conformity Rule for NO_x which is a precursor pollutant for both ozone and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}) for calendar year 2017 in Lancaster County, Pennsylvania. Lancaster County is currently designated as a nonattainment area for the 2008 Ozone NAAQS and a maintenance area for the 2006 24-hour PM_{2.5} NAAQS.

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. Comments from 355 commentators were received. Many commentators commented on issues that were outside of the scope of the proposed Air Quality Plan Approval. 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.

DEP has summarized the received comments. The first group consists of comments and responses that are within the scope of the requested comments. The second group consists of comments determined to be out-of-scope of the proposed Air Quality Plan Approval. In the public interest, the Department may provide additional information or give some limited response to certain out-of-scope comments. No changes to the conditions of the proposed plan approval were made due to comments received.

Comments Within the Scope of Requested Comments

Comment 1. A number of commentators expressed support for the Air Quality Plan Approval Application filed by Williams. (338, 343, 344, 345, 346, 348, 349, 351, 353)

Response: The DEP thanks the commentators for the comment.

Comment 2. The commentators do not support the air quality plan approval and do not want DEP to issue the Air Quality Plan Approval because the project will have adverse health effects. (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179,

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Response: The DEP thanks the commentator for the comment.

Under Section 109 of the Clean Air Act two types of national ambient air quality standards are identified. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. DEP thoroughly reviewed the plan application and the technical information included with that application and concluded that DEP believes that the emissions from the pipeline project will not cause a violation of the NAAQS.

The issuance of the plan approval will ensure that the temporary emissions from this project are offset and will (1) not cause or contribute to new violations of NAAQS in Lancaster County, (2) not interfere with the provisions of an applicable maintenance SIP, (3) not increase the frequency or severity of any existing violation of NAAQS in Lancaster County, and (4) not delay timely attainment of a NAAQS or required interim emissions reduction or milestone. As a result, the project will not have the adverse health impacts identified by the commentators.

Comment 3. The commentators state that Lancaster County does not need additional pollution because it is a nonattainment area for ozone and fine particulate matter. (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 288, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 320, 321, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 339, 340, 342, 347, 355)

Response: DEP disagrees with the underlying premise of these comments. In July 2015, the EPA approved the Department's 10-year area maintenance plan and request to redesignate

Lancaster County in attainment of both the 1997 and 2006 24-hr PM_{2.5} NAAQS. (80 FR 42050 July 16, 2015)

In May 2016, the EPA determined that Lancaster County attained the 2008 8-hr Ozone NAAQS based on certified monitoring data collected in the county from 2012 through 2014 (81 FR 26697 June 3, 2016). Subsequent ambient ozone monitoring data collected in 2015 and 2016 support the Department's 2017 recommendation to EPA to designate Lancaster County as in attainment of the current 2015 8-hr Ozone NAAQS.

The ERCs that will be issued for this project will ensure that Lancaster County will continue to meet its air quality goals.

Comment 4. The commentators believe that DEP should require Transco to submit a plan that does not allow any additional air contaminants. (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 278, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 310, 314, 340, 350)

Response: The NO_x emissions resulting from the construction activities for the Atlantic Sunrise Pipeline project need to be either mitigated or offset because the amount of emissions resulting from this project are estimated to exceed the 100 tons per year (tpy) calendar year applicability rate threshold for requiring a demonstration of General Conformity. The affected federal agency, in this case FERC, can accept the mitigation or offset of the project's emissions in a number of ways such as including the project's emissions in the applicable SIP, developing a local mitigation project that reduce emissions, or purchasing emission reduction credits (ERCs). 40 CFR § 93.158(a)(2). In this case, the purchase of ERCs is the most feasible option. The emission reductions achieved through these ERCs will be permanent in nature.

Areas in Pennsylvania benefit from upwind facilities reducing their emissions and registering their ERCs. ERCs are generated when a source of pollution reduces emissions when not required to do so by a law or regulation (i.e. they are surplus reductions). If the DEP did not allow the use of ERCs to offset emissions, the demand for ERCs would be lessened and the value of ERCs would decrease. Less incentive would exist for an owner of a pollution source to reduce emissions early. The early reduction of emissions in upwind areas has benefitted areas in the

Commonwealth like Lancaster County by reducing air pollution concentrations and it will continue to do so in the future.

The permanent retirement of 106 Tons of NO_x ERCs from a contributing adjacent nonattainment area of equal or higher classification for ozone such as Harford County, MD, will more than offset project construction emissions estimated to be generated for less than one year.

Comment 5. ERCs generated from a closed facility in Harford County, MD does not reduce pollution in Lancaster County. The use of ERCs to offset emissions is inappropriate. (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 267, 270, 271, 288, 293, 297, 298, 299, 300, 301, 302, 303, 309, 310, 311, 312, 314, 315, 316, 317, 318, 319, 320, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 337, 339, 340, 342, 347, 350, 354)

Response: DEP disagrees that the use of ERCs will not offset the emissions.

The Clean Air Act and the Pennsylvania regulations provide for the use of ERCs to offset emissions increases in nonattainment areas under the federal general conformity requirements at 40 CFR Part 93, Subpart B adopted by Pennsylvania and incorporated by reference at 25 Pa. Code Chapter 127, Subchapter J. The use of ERCs to offset temporary emissions from construction of the project will satisfy the criteria for determining conformity of general federal actions as specified in 40 CFR 93.158(a)(2). The use of ERCs to offset the emissions increase ensures that the project will not result in degradation of air quality as the offset results in no net emissions increase in the Lancaster area. The approval of the use of the ERCs from Harford County, MD to offset the emissions from the Project is consistent with the above referenced Clean Air Act and the Pennsylvania regulations.

DEP's ERC regulations are part of its New Source Review (NSR) program codified at 25 Pa. Code Chapter 127, Subchapter E. This program is a critical part of Pennsylvania's clean air plans across the Commonwealth and is federally enforceable. The proposed air quality plan approval issued for this project via the provisions of the NSR program provides the necessary federally enforceable mechanism to in turn ensure the retirement of the ERC's by the company. It also serves a dual purpose to demonstrate to FERC that their applicant has taken the necessary appropriate legal steps to mitigate and/or offset project construction emissions so that FERC can ensure their compliance with both federal and Pennsylvania General Conformity requirements.

DEP has reviewed atmospheric modeling inputs and outputs developed by the Commonwealth of Virginia and used by FERC in the air quality analysis included in the General Conformity Determination for the Atlantic Sunrise Pipeline project. DEP has also examined the Hybrid Single Particle Lagrangian Integrated Trajectory (HYSPLIT). HYSPLIT traces the origin of the wind over an area back in time. DEP uses HYSPLIT to determine the likely path of emission plumes over a 24-hour period during days when Lancaster County experienced an exceedance of the NAAQS for ozone. HYSPLIT was also used in the General Conformity Determination prepared for FERC. Both atmospheric modeling and HYSPLIT analysis shows that on days when Lancaster County's air quality is worse there is a strong potential for the pollution to be coming out of the Baltimore-Washington area, which includes Harford County, MD, and traveling over the Lancaster County area.

The HYSPLIT model was used to calculate back trajectories of air parcels traversing the region on days when the Lancaster County ozone monitor (i.d. 42-71-0007) recorded a maximum daily 8-hour ozone concentration greater than or equal to the NAAQS of 70 parts per billion. The HYSPLIT evaluation showed that the air parcels impacting the Lancaster monitor on those days had traversed over both Howard and Harford Counties (among others).

Similarly, the CMAQ atmospheric modeling provided by the Virginia Department of Environmental Quality (VADEQ) was used to determine the ozone contribution from Maryland sources to the Lancaster monitor. It was EPA that recommended that Williams use of the VADEQ CMAQ model for this case. The VADEQ used the CMAQ model to generate regional scale simulations of multiple air quality issues, including ozone, fine particles, toxics, acid deposition, and visibility degradation; the Lancaster County ozone monitor was included in the VADEQ modeling evaluation. As with the HYSPLIT model evaluation, DEP found that the CMAQ model demonstrated that sources in Maryland contributed to ozone levels at the Lancaster monitor during certain ozone exceedance episodes.

The ERCs were generated from emissions reductions at a permanent source of NO_x and would typically be applied to another permanent NO_x generating source, which would allow ongoing emissions of NO_x over the life of the new source. Here, however, the company is using the ERCs to offset temporary (less than one calendar year) emissions from the localized construction of the pipeline. The ERCs applied to this project will be permanently retired and will result in a continuing air quality benefit after the project is complete.

Comment 6. The project has evaded a complete and thorough review of its many environmental impacts. (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215,

216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 321, 322, 334, 340, 342)

Response: DEP disagrees. This Air Quality Plan Approval is not intended to be a complete review of all or many environmental impacts related to this project. This plan approval pertains only to the potential effects this project's direct and indirect construction emissions will have on air quality in Lancaster County. The proposed ERC transaction is for the purpose of offsetting those emissions in accordance with the federal and Pennsylvania requirements for General Conformity. DEP has reviewed other environmental impacts related to this project through the Chapter 102 and 105 approval process. In addition, the project's environmental impacts outside of this plan approval process were studied and appropriate mitigation measures were identified during the FERC approval process.

Comment 7. DEP should require that Transco submit an air quality plan that improves the air in Lancaster County. (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 285, 286)

Response: DEP adopted the Federal General Conformity requirements by reference and included the requirements in 25 Pa Code, Chapter 127, Subchapter J. DEP can only require that Transco meets the requirements of General Conformity.

General Conformity is designed to prevent a Federal project built in a non-attainment or maintenance area from worsening air quality in those areas. DEP believes that this project meets the federal and state requirements for General Conformity and that the project will not worsen air quality. The required emission offsets need to be at least equal to the amount of direct and indirect emissions produced by the project. Transco will meet this requirement.

See also the response to Comment 4 with regard to permanent ERC retirements offsetting emissions generated over less than one year.

Comment 8. Several commentators stated the air in the Lancaster County area is the most polluted in the country and therefore the Department should not allow the plan approval to authorize the retirement of the ERC's. (256, 270, 289, 314, 324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The Department disagrees that Lancaster County is the “most polluted” in the country. On July 20, 2012 Lancaster County was designated as in marginal nonattainment of the 2008 8-hr Ozone NAAQS. On May 4, 2016, the EPA determined that Lancaster County attained the 2008 8-hr Ozone NAAQS based on certified monitoring data collected in the county from 2012 through 2014 (81 FR 26697). Subsequent ambient ozone monitoring data collected in 2015 and 2016 support the Department’s 2017 recommendation to EPA to designate Lancaster County as in attainment of the current 2015 8-hr Ozone NAAQS. The Department does not expect construction of this project in Lancaster county to alter the Department’s current recommendations to EPA pertaining to the county’s designation under the 2015 8-hr Ozone NAAQS. The permanent retirement of the ERCs used during this temporary construction period will ensure that Lancaster County’s air quality is protected.

Comment 9. The Department should force the company to adhere to the levels that have been proposed to reduce pollution in this area. (257)

Response: The Department’s issuance of the Air Quality Plan Approval memorializing the retirement of the ERCs ensures the company retires the credits and thus complies with the applicable requirements for General Conformity and ERC transactions.

Comment 10. This is a critical environmental air quality issue that not only affects this company and pipeline but all the pipelines and needs to be applied across the board. (258, 283)

Response: The plan approval process in this case affects only one company. However, the Department’s General Conformity regulations at 25 Pa. Code Chapter 127, Subchapter J are applied consistently across the state where applicable. A General Conformity applicability analysis is required by the federal agency for any subject, non-*de minimis* federal action occurring in existing NAAQS nonattainment or maintenance areas. Federal projects that would be determined to require a demonstration of General Conformity with an area’s NAAQS State Implementation Plan, must have concurrence from DEP that the project’s proposed emissions mitigation and/or offsets conform with the applicable SIP.

Comment 11. Several commentators commented that by proposing the Plan Approval the Department has “sold out” to industry or is “working for corporations” as opposed to protecting the environment. Others commented that the Department’s actions perpetuated corporate greed at the expense of the citizens the Department protects. Others comment the Department is failing its mission. (255, 260, 261, 266, 267, 268, 271, 275, 281, 284, 290, 291, 292, 296, 312, 314, 315, 318, 320, 321, 322, 324, 325, 326, 327, 328, 329, 330, 331, 332, 334, 335, 340, 342)

Response: The Department disagrees with the commentators. DEP’s mission is to protect public health and the environment. The regulations that govern this plan approval application process are protective of both public health and the environment. DEP objectively implements these regulations without regard as to whom the applicant might be. The Department’s Plan Approval ultimately completes a process of FERC compliance with both Federal and Pennsylvania regulations prohibiting federal actions occurring in NAAQS nonattainment or maintenance areas unless that action “conforms to an applicable implementation plan”. Both FERC and Transco have

complied with appropriate, existing Commonwealth regulations that have been applied consistently to every federally authorized project from federal agencies occurring in Pennsylvania's NAAQS nonattainment and maintenance areas.

Comment 12. Commentators believe the approval of the Transco plan approval application for the use of ERCs to offset the air emissions from the construction activities of the pipeline project violates Article I, Section 27 of the Pennsylvania Constitution. DEP's constitutional duties are not necessarily satisfied by compliance with statutory or regulatory standards. (272, 274, 318, 320,321, 322, 324, 325, 326, 327, 328, 329, 330, 331, 332, 324, 325, 326, 327, 328, 329, 330, 331, 332, 340, 342, 350, 354, 355)

Response: DEP disagrees issuance of the subject Air Quality Plan Approval violates Article I, Section 27 of the Pennsylvania Constitution.

DEP's review of the plan approval application and the approval of that application is consistent with all applicable federal and State statutory and regulatory requirements. These legal requirements, DEP's thorough review process, application of its scientific and technical expertise in air quality management, as well as the project specific terms and conditions of the plan approval, satisfy Article I Section 27 of the Pennsylvania Constitution. The plan approval provides reasonable protections for public health and safety and the environment.

DEP gave due consideration to the environmental effects of its plan approval decision in this case prior to approving it. DEP reviewed all the information submitted by Transco including the HYSPLIT and CMAQ modeling evaluations and emission factors generated by MOVES to demonstrate the suitability of ERCs from Harford County, MD for use in Lancaster County. The issuance of the plan approval will not cause unreasonable degradation to the air resources of the Commonwealth in the Lancaster County area. The air emissions generated from this project are limited to a discrete construction period and are temporary in nature. ERCs are generally generated from the shutdown of one permanent facility and used for another permanent facility. The ERCs in this case are generated from a permanent shutdown to be used for temporary activities. The ERCs applied to this project will be permanently retired and will result in permanent air quality benefits after the project is completed.

DEP acted to conserve and maintain the air quality of the area through the careful exercise of its technical expertise in the review of the plan approval application, and through its approval of the use of ERCs that will be permanently retired to offset the air emissions from the temporary construction activity of the pipeline. DEP's approval of Transco's use of 106 tons of NOx ERCs that Transco will then retire addresses both ozone and fine particulate matter to assure that the project does not result in adverse long-term air quality impacts. As a result, DEP's approval of the Transco plan approval is consistent with all applicable law.

Comment 13. Multiple commentators commented that because the Air Quality Plan Approval authorizing the ERCs would lead to project construction, they were concerned about the current and future frequency of high pollution days and pollution levels that would limit themselves, family, sensitive populations (e.g., children, elderly, asthmatics) and / or the general

public's ability to be outside or to suffer general negative health effects. (261, 262, 269, 276, 279, 280, 281, 282, 284, 287, 288, 314, 316, 321, 335, 337, 339, 354)

Response: The Department appreciates the comment and believes that the Air Quality Plan Approval authorizing the ERC transaction will not interfere with Pennsylvania's ability to achieve or maintain the NAAQS or contribute to new violations of a NAAQS.

According to historical data on the Air Quality Index (AQI), since Lancaster County was designated in nonattainment of the 2008 8 Hr. Ozone NAAQS in 2012, the annual number of unhealthy air pollution days for sensitive groups has decreased almost 74 percent. The number of "moderate" days where only a small number of unusually sensitive people are affected by air pollution has decreased over 10 percent. Since one day in 2012, there has been only one day through 2016 where air pollution levels were considered "unhealthy" for the general population.

The percentage of days where the air quality was considered "good" increased over 22 percent between 2012 and 2016.

In July 2015, the EPA approved the Department's 10-year area maintenance plan and request to redesignate Lancaster County to attainment of both the 1997 and 2006 24-hr PM_{2.5} NAAQS. (80 FR 42050)

Given the observed and expected air quality trends in Lancaster County coupled with the offset of the direct and indirect construction emissions that would be associated with the project, the Department anticipates no increase in the number of high pollution days due to the Air Quality Plan Approval.

Comment 14. The commentator stated Williams has adhered to all regulations that have been outlined by the DEP. (338, 343)

DEP agrees that the company has complied with regulatory requirements sufficient for DEP to legally issue the proposed Air Quality Plan Approval to the company. DEP also believes that the company's receipt of the final plan approval, and subsequent retirement of the 106 tons of NO_x ERCs, will be sufficient to demonstrate to FERC the completion of an emissions offset for the project's direct and indirect construction emissions. DEP, after consultation with the U.S. EPA, believe the plan approval is a "similarly enforceable measure" as described in 40 CFR §93.158(a)(2) suitable for use for the demonstration of emissions offset for General Conformity with the Lancaster County nonattainment/maintenance area NAAQS SIPs.

Comment 15. The commentator stated that the Atlantic Sunrise Pipeline Project would push the air we breathe to illegally dangerous levels. (356)

Response: DEP disagrees. Under Section 109 of the Clean Air Act two types of NAAQS standards are identified. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. DEP thoroughly reviewed the plan

application and the technical information included with that application and concluded that the emissions from the pipeline project will not cause a violation of the NAAQS

See also the response to Comment 5.

Comment 16. Modeling evaluations used to demonstrate the suitability of using ERCs in Lancaster County were based on a source in Howard County, MD. The ERCs are now from a source in Harford County, MD so the modeling evaluations must be redone to demonstrate suitability. (323, 324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The Department disagrees. See the response to Comment 5 for responses to modeling evaluations with HYSPLIT and CMAQ.

Comment 17. The version of MOVES used to estimate emissions was outdated and may have underestimated emissions. (323)

Response: The Department disagrees. Equipment emission factors for the Project were provided by Williams and, where appropriate, were generated using MOVES2014. MOVES2014 was the latest version of the MOVES model when Williams began the permitting process through FERC in early 2015 and was used for subsequent emissions estimates through the FERC Environmental Impact Statement (EIS) process required under the National Environmental Policy Act. EPA did not require the FERC to evaluate the project for the purposes of General Conformity using MOVES 2014a when that version was announced in late 2015. Furthermore, EPA noted that while MOVES2014a is the latest version of MOVES, it does not significantly change the criteria pollutant emissions results of MOVES2014, and therefore is not considered a new model for SIP and transportation conformity purposes.¹

For DEP's review of the estimates by Williams on the direct and indirect construction impacts of nonroad equipment, DEP determined that the project's MOVES 2014 NONROAD generated factors used by Williams for sources of highest emissions significance (e.g. excavators, dozers and HDD rig) were substantially higher than those estimated by DEP using MOVES2014a specifically for Lancaster county. Additionally, Williams used conservative (i.e. higher) hourly activity estimates for many of those factors. Both assumptions combined would tend to overestimate potential emissions for the project from these significant sources.

Comment 18. The commentator states that Williams will monitor its construction activity in to ensure the actual construction emissions do not exceed the predicted 106 tons of NOx. (338, 343, 348)

Response: DEP thanks the commentator for the comment. In addition to monitoring by FERC, DEP will also monitor the project's progress to ensure that any delays or unforeseen circumstances do not allow the project's emissions to exceed 106 tons of NOx per calendar year. If emissions exceed the projected 106 tons of NOx, DEP will ensure Williams' purchase additional ERCs ahead of any construction activities that will increase the emissions above 106 tons of NOx per calendar year.

¹ <https://www.epa.gov/moves/moves2014a-latest-version-motor-vehicle-emission-simulator-moves>

Comment 19. The commentator states that the emissions that are subject to the proposed Air Quality Plan Approval are temporary impacts and are the maximum potential to emit, therefore, it is unlikely that the maximum potentials will be reached. (345, 346)

Response: DEP agrees with the comment. In addition to monitoring by FERC, DEP will also monitor the project's progress to ensure that any delays or unforeseen circumstances do not allow the project's emissions to exceed 106 tons of NO_x per calendar year.

Comment 20. The commentator disagrees with the approach for offsetting the emissions of the project. The commentator believes that the project should offset much more than 105.4 tons of NO_x based on the percentage of days when ozone exceeds the NAAQS. (288, 333)

Response: DEP disagrees. No provision in law, regulation, or EPA guidance exists for using the type of analysis referenced by the commentator. Using the commentator's assumption that wind direction proportion alone determines a likewise proportional transport contribution of an ozone precursor is not an assumption used in an acceptable modeling analysis. Many variables other than local wind direction affect ground level ozone formation. DEP and EPA use models such as HYSPLIT and CMAQ to inform air planners on the potential local effects of transport. See also the response to comment 5.

DEP believes that Williams has been conservative in their emissions estimates. See also the response to Comment 25. The retirement of permanent ERCs for emissions generated for less than one year will provide additional permanent benefit for the Lancaster County area.

Comment 21. The assumption that there is a connection between Maryland air quality and Lancaster's is incorrect. Based on wind rose diagrams for both the Baltimore and Lancaster areas, there's very little wind from Baltimore toward Lancaster County and it would be inappropriate to use the Harford County ERCs as an offset in Lancaster County. (13, 314, 347)

Response: DEP disagrees. Both Maryland and Pennsylvania are in the Ozone Transport Region. In addition, no regulatory basis or EPA guidance exists that states that the commentator's approach should be followed. The commentator's assumption that wind direction proportion alone determines a likewise proportional transport contribution of an ozone precursor cannot be used in an acceptable atmospheric modeling analysis. Many variables other than local wind direction affect ground level ozone formation. DEP and EPA use models such as HYSPLIT and CMAQ to inform air planners on the potential local effects of transport. See also the response to comment 5.

Comment 22. Air monitoring was done to demonstrate the ERCs being retired, come from an area that is impacting air quality in Lancaster County. (346)

Response: DEP believes that the commentator meant modeling not monitoring. We agree with the comment. See also the response to Comment 5.

Comment 23. Based on wind rose data and other assumptions, the use of the 106 tons of ERCs from Harford County, as proposed, does not satisfy the requirement that “that there is no net increase in emissions of that pollutant” as a result of a project. (288,333)

Response: The Department disagrees. Based upon the contribution demonstrated in the HYSPLIT and CMAQ modeling, the overestimation of potential project emissions by the company, the use of permanent shutdown ERCs to offset construction emissions generated over less than one year, and the issuance of a Federally enforceable Air Quality Plan Approval consistent with both federal and state regulations for General Conformity, demonstrates that no net emissions increase from the construction of this project will occur.

See also the response to Comments 5 and 17.

Comment 24. The commentator states that DEP did not meet the requirement that the analysis must show that emissions produced by the Atlantic Sunrise Pipeline Project will not cause or contribute to any new violation nor increase the existing violations. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: DEP disagrees. The ozone NAAQS design value from which a violation is determined is the annual fourth-highest daily maximum 8-hour ozone concentration, averaged over three years with the most recent certified monitoring data. A violation of the ozone NAAQS occurs when the three-year averaged, fourth-highest daily maximum 8-hour monitored concentration exceeds the numerical value of the standard. DEP believes that the project will not contribute to a violation

See also to the response to comments 5 and 19.

Comment 25. The commentator states that the Plan Approval process is the only process available to memorialize the use and retirement of the emission reduction credits needed to offset emissions of the Atlantic Sunrise Pipeline Project. (345, 348)

Response: DEP agrees with the commentator. Under DEP’s existing regulation, the use of the plan approval process is an acceptable way to use and retire the ERCs for this project.

Comment 26. The commentator stated that DEP cannot keep issuing permits without discussing DEP’s responsibility to the state and to the citizens who live here. (355)

Response: DEP disagrees that it has not been responsive to citizens’ concerns. An air quality plan approval cannot be issued without public review and comment. For this proposed air quality plan approval, DEP opened a 30-day comment period and held a public hearing in order to receive comment on the appropriateness of where the ERCs were obtained and the amount of ERCs needed to offset emissions from construction activities associated with the Atlantic Sunrise Pipeline Project. Citizens have had ample opportunity to make their concerns known. As appropriate, DEP has taken those concerns into account when issuing this plan approval.

Comment 27. The approval of Transco's application to transfer emissions credits permits further degradation of air quality in Lancaster County where citizens own property. (323)

Response: The Department disagrees that degradation will occur. See also the response to Comment 5.

Comment 28. DEP and Transco should analyze the potential health hazards of creating a higher level of ground level ozone in one location in exchange for reducing it in another state. (352)

Response: DEP thanks the commentator for the comment. Based upon the modeling (see response to Comment 5), the issuance of the proposed Air Quality Plan Approval will not contribute to a violation of ozone and/or PM2.5 NAAQS in Lancaster County as per the requirements of General Conformity.

Comment 29. The commentator strongly urges DEP to consider other options that would reduce pollution from nearby sources located in Pennsylvania. (352)

Response: The option to offset the estimated construction emissions was selected by Williams and is consistent with the requirements for demonstrating General Conformity (40 CFR Part 93, Subpart B) with existing air quality plans for Lancaster County. ERCs generated in Lancaster County were not available for retirement. Nevertheless, the ERCs used for this temporary project will be permanently retired.

Also see the response to Comment 5 pertaining to air quality modeling.

Comment 30. Transco should do everything technologically possible to reduce NOx emissions from the site, even if it is costly. (352)

Response: The company and FERC have complied with the requirements for the demonstration of General Conformity. The NOx estimates provided by Williams for construction equipment were conservative. According to Williams, they will ensure that equipment operating on the project will be operated in a manner to minimize emissions when practicable, and use the highest tier rated equipment when available. According to Williams, they have required their construction contractors to purchase the highest tier rated equipment when procuring new equipment for this project. Moreover, this issue was addressed during the FERC approval process by Williams.

Comment 31. Williams has obtained credits to offset the temporary construction-related emissions to the pipeline in Lancaster County. These ERCs will be permanently retired, resulting in a permanent benefit to the local air quality. (346)

Response: DEP agrees with the comment. Unlike the typical use of ERCs for construction and operation of a permanent emission source which allows ongoing emission of the air contaminants, the ERCs proposed for this project will be permanently retired to offset temporary construction activity, resulting in an ongoing air quality benefit after the project is complete.

Comment 32. Measures should be taken in the exact areas where construction takes place to mediate air quality problems and NOx emissions. (92, 256, 267, 297, 298, 299, 300, 301, 302, 303, 304, 309, 310, 311, 312, 314, 317, 318, 319, 322, 324, 325, 326, 327, 328, 329, 330, 331, 332, 352, 354)

Response: The use of the ERCs from Harford County, Maryland is consistent with the provisions of the Clean Air Act and the Pennsylvania regulations. The application of the ERCs to offset the emissions from construction of the pipeline in Lancaster County will not degrade air quality in Lancaster County. The ERCs applied to this project will be permanently retired, resulting in an ongoing air quality benefit for Lancaster County after the project is complete.

See also the response to Comment 5

Comment 33. The legality of the credit purchase should be reconsidered when evaluating the current air quality in this area. (267, 297, 298, 299, 300, 301, 302, 303, 309, 310, 311, 312, 314, 316, 317, 318, 319, 322)

Response: The use of the ERCs from Harford County, Maryland is consistent with the provisions of the Clean Air Act and the Pennsylvania regulations and DEP does not believe the proposed Air Quality Plan Approval is inconsistent or contrary to federal or Pennsylvania regulations pertaining to General Conformity and the use of ERCs.

Comment 34. The commentators indicate that the existing air quality in Lancaster County is not acceptable, based on information compiled by the American Lung Association and others. The commentators indicate that these levels of air quality adversely affect health of residents, including asthma related incidents and other adverse impacts on susceptible populations. (297, 298, 299, 300, 301, 302, 303, 309, 310, 311, 314, 315, 316, 317, 318, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: In July 2015, the EPA approved the Department's 10-year area maintenance plan and request to redesignate Lancaster County in attainment of both the 1997 and 2006 24-hr PM2.5 NAAQS. (80 FR 42050 July 16, 2015)

In May 2016, the EPA determined that Lancaster County attained the 2008 8-hr Ozone NAAQS based on certified monitoring data collected in the county from 2012 through 2014 (81 FR 26697). Subsequent ambient ozone monitoring data collected in 2015 and 2016 support the Department's 2017 recommendation to EPA to designate Lancaster County as in attainment of the current 2015 8-hr Ozone NAAQS.

According to historical data on the Air Quality Index (AQI), since Lancaster County was designated in nonattainment of the 2008 8 Hr. Ozone NAAQS in 2012, the annual number of unhealthy air pollution days for sensitive groups has decreased almost 74 percent. The number of "moderate" days where only a small number of unusually sensitive people are affected by air pollution has decreased over 10 percent. Since one day in 2012, there has been only one day through 2016 where air pollution levels were considered "unhealthy" for the general population.

The percentage of days where the air quality was considered “good” increased over 22 percent between 2012 and 2016.

DEP appreciates the work done by the American Lung Association and their efforts to inform the public on important air quality issues. However, their evaluation methods for ranking the effects of ambient air pollution in population centers is inadequate to demonstrate compliance with the NAAQS.

Comment 35. Lancaster County’s air quality has not substantially improved since the Harford County Resource Recovery Facility was closed in March 2016. (322)

Response: DEP disagrees. In May 2016, the EPA determined that Lancaster County attained the 2008 8-hr Ozone NAAQS based on certified monitoring data collected in the county from 2012 through 2014 (81 FR 26697). Subsequent ambient ozone monitoring data collected in 2015 and 2016 support the Department’s 2017 recommendation to EPA to designate Lancaster County as in attainment of the current 2015 8-hr Ozone NAAQS.

Comment 36. There is no evidence of a safe level of exposure for ozone or PM_{2.5}, and both have health effects below the current NAAQS. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: DEP disagrees. DEP’s air quality plans are designed in accordance with the Federal Clean Air Act. The Clean Air Act require states to achieve and/or maintain NAAQS for criteria pollutants. High concentrations of criteria pollutants in ambient air have been demonstrated to have adverse health effects on people and the environment. The NAAQS primary standards are designed to protect human health, with an adequate margin of safety, including sensitive populations such as children, the elderly, and individuals suffering from respiratory diseases. DEP’s review of the plan approval application in this case show that no NAAQS violations are anticipated to occur because of this project.

Comment 37. The company is using ERCs from Harford County, MD rather than from Howard County, MD, or York County, PA as was indicated previously. (324, 325, 326, 327, 328, 329, 330, 331, 332, 334)

Response: DEP does not believe the location of the specific county within the nearby area of equal or greater nonattainment, and the permanent retirement of appropriately and legally generated NO_x ERCs will affect the use of the ERCs to offset the short-term construction emissions estimated for the project in Lancaster County. Federal and Pennsylvania General Conformity regulations allow for the use of full offset from either within the same nonattainment or maintenance area or a “nearby area of equal or higher classification provided the emissions from that area contribute to the violations, or have contributed to violations in the past”.

The Department believes the credits from Harford County, MD meet that requirement. See the response to Comment 5 pertaining to air quality modeling. ERCs were not available from Lancaster County. York County, PA is in attainment of the Ozone NAAQS.

Comment 38. The company has not adequately demonstrated that emissions from the relevant area in Maryland (Harford County) impact air quality in Lancaster County. (324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334)

Response: DEP disagrees. HYSPLIT and CMAQ modeling show the demonstration of contribution needed to retire the Harford Country, MD ERCs to offset the construction emissions in Lancaster County in accordance with federal and Pennsylvania General Conformity regulations. See the response for Comment 5.

Comment 39. The company has not adequately demonstrated that sufficient ERCs are available. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: DEP disagrees. The company has already secured the requisite number of NOx ERCs. The proposed plan approval is an authorization to complete and memorialize the ERC retirement transaction.

Comment 40. On the General Information Form for the Plan Approval application the company responded “No” to Question 3.0: “Will your project, activity, or authorization have anything to do with a well related to oil or gas production...?” and should have answered “Yes” to this question and proceeded to answer Questions 3.1-3.3. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The proposed Air Quality Plan Approval is for the authorization and Federally enforceable documentation of a permissible ERC transaction for the ultimate purpose of a determination of General Conformity required by federal and Pennsylvania regulation. It is not a plan approval for a source of oil and gas production.

Comment 41. On the General Information Form on the Plan Approval application, in response to Question 4.0.1, the company declined to provide a response to “Total Disturbed Acreage”. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The transfer and retirement of ERCs reflected in the Plan Approval do not require an evaluation of “Total Disturbed Acreage”. The company has provided appropriate estimates of Lancaster County land disturbance for the project as part of FERCs Draft and Final Environmental Impact Statement and for FERCs General Conformity applicability analysis.

Comment 42. On the General Information Form Questions 5.0-5.3, 6.0, and 13.0, the company appears to have answered these questions with an extremely narrow reading of “the project” in mind. In responding to these questions, “the project” should be interpreted as the Atlantic Sunrise pipeline project. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The Department disagrees. The proposed Air Quality Plan Approval and its application forms are for the authorization of transfer and retirement of ERCs for the purpose of demonstration with the federal and Pennsylvania regulations requiring General Conformity for certain federal projects and action with applicable air quality state implementation plans (SIPs) in

Lancaster County. The proposed plan approval and application is not for an authorization for the entire Atlantic Sunrise project.

Comment 43. As required by the Air Pollution Control Act Compliance Review Form, Table 5, the company must list all incidents of deviations including “items both currently known and unknown to the Department.” (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The company has listed all deviations known to DEP. All deviations have been resolved prior to the Air Quality Plan Approval. 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.

Comment 44. Use of these ERCs, which were generated more than a year ago in another state, will not protect residents from the adverse health impacts of new air pollution emitted by the project. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: DEP disagrees. The ERCs being retired are from permanent shutdowns of facilities the nature of which could be used to legally offset new permanent sources of air pollution consistent with DEP’s federally approved and enforceable New Source Review program. As the ERCs subject to the proposed Plan Approval will offset emissions generated in their entirety within a span of less than one year, Lancaster County will receive the permanent benefits of removal of those credits from the pool of available ERCs.

See also the response to Comment 5.

Comment 45. The commentator suggests that changing weather patterns are affecting movement of air masses. The commentator indicates that since the proposed plan approval is predicated on the Cross State Air Pollution Rule (CSAPR) and long distance pollutant transport, the consequences of the changing weather patterns should be assessed. (322)

Response: This project is not subject to CSAPR. DEP relied on atmospheric modeling using HYSPLIT and CMAQ to assess the contribution from Harford County, MD. These approved models take into account weather patterns and other atmospheric variables to generate the results.

See also the response to Comment 5.

Comment 46. Considering the prevailing winds, emissions from the Harford County source are unlikely to be regularly transported to Lancaster County and contribute to a NAAQS exceedance in Lancaster County. (13,333)

Response: DEP disagrees. HYSPLIT and CMAQ atmospheric modeling both demonstrate that the nearby nonattainment area in Maryland has contributed to Lancaster County during events of ozone exceedance.

See also the response to Comment 5.

Comment 47. Commentators state there is nothing to suggest that Harford County, MD sources contributed more than 1 ppb on these rare occasions. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: For purposes of General Conformity there is no *de minimis* threshold for contribution from a nearby area of equal or greater nonattainment classification. To predicate the proposed Air Quality Plan Approval and related ERC transaction on meeting an ozone precursor contribution threshold of any level would be contrary to federal and Pennsylvania General Conformity regulations.

Comment 48. The conclusion that ‘it is reasonable to conclude that the Baltimore area NO_x ERCs would provide a secondary PM_{2.5} benefit in Lancaster County’ is not adequately supported with regard to the Harford County ERCs. (324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: The Department disagrees. Transport of NO_x from Harford County, MD can affect secondary PM_{2.5} formation in Lancaster County as there is sufficient time and distance between for that PM_{2.5} to form. Unlike direct PM_{2.5} emission, secondary PM_{2.5} emissions are formed based on a variety of variables including atmospheric stability, temperature and solar radiation that can affect the formation rate of secondary PM_{2.5} over hours. This formation could, in turn, influence monitored values of total PM_{2.5} in Lancaster County.

Comment 49. The Amount of ERCs proposed to offset emissions from project construction activities in Lancaster County is insufficient. (324, 325, 326, 327, 328, 329, 330, 331, 332, 333)

Response: The Department disagrees. See the response to Comment 17 with regards to the emissions estimation assumptions for equipment emissions factors and activity.

Comment 50. Commentator states it is unclear how DEP deemed the application complete to hold public hearings yet then issued another deficiency letter in July after the hearings and public comment had closed. (321)

Response: DEP determined that the proposed Air Quality Plan Approval application is administratively complete prior to beginning its technical review. No deficiency letter was issued by DEP with regard to the proposed Air Quality Plan Approval. The comment period for the proposed Plan Approval closed on August 21, 2017. The Public Hearing was held on August 14, 2017.

Comment 51. Commentators state that General Conformity requires that direct and indirect project emissions be mitigated or offset to ensure that a project in a nonattainment or maintenance area for the NAAQS conforms to the SIP and that air quality is not affected.

Response: DEP agrees with the comment. The proposed air quality plan approval provides a federally enforceable mechanism to ensure the company’s proposed use of ERCs to offset the direct and indirect project construction emissions in Lancaster County meet the federal and Pennsylvania requirements for General Conformity.

Comments Out-of-Scope of Requested Comments

Comment 52. Commentators felt that the company should also submit plans for construction in adjacent Lebanon County and/or along the entire project in Pennsylvania. (274, 283, 295)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval for Lancaster County. Moreover, this issue was addressed during the FERC approval process.

However, in the interest of informing the public, though Lebanon County is a nonattainment area for the 2012 annual PM_{2.5} NAAQS and a maintenance area for the 2006 24-hour PM_{2.5} NAAQS, estimated Lebanon County direct and indirect emissions from project construction are below the 100 ton per year General Conformity applicability thresholds for PM_{2.5} nonattainment and maintenance areas as specified in 40 CFR § 93.153(b) (relating to Applicability) and incorporated by reference at 25 Pa. Code § 127.802.

As the estimated emissions were below the 100 tpy direct PM_{2.5} and precursor thresholds, FERC does not have to demonstrate General Conformity and thus require the applicant (Transco) to mitigate or offset construction emissions in the Lebanon County PM_{2.5} nonattainment / maintenance area.

Monitored ambient air quality data from Lebanon County from 2012 through 2016 currently show the county as meeting the PM_{2.5} NAAQS. DEP anticipates EPA will soon issue a “Clean Air Determination” for the area thus

Comment 53. Lancaster County produces an enormous amount of food for the rest of our state. The DEP threatens our food supply with even more pollution. (294)

Response: The comment is outside of the scope of the proposed Air Quality Plan Approval. Moreover, the commentators do not provide any support for their contention that food supply is threatened because of the ERC plan approval process.

Comment 54. The commentators stated that other ways, such as renewable energy, need to be found to reduce pollution. (263, 264, 316)

Response: The Department agrees that pollution prevention, including the use of renewable energy sources, can greatly reduce pollution. However, the comment is beyond the scope of the proposed Air Quality Plan Approval.

Comment 55. One commentator stated that as a tax payer it was not equitable to burden the county and state with pollution allowed by credits from another state when state tax dollars would be expended for emergency response and remediation in the event of a leak or large accident. (295)

Response: The comment is outside of the scope of the proposed Air Quality Plan Approval. Moreover, the commentator doesn't supply any support for their contention.

Comment 56. The things this company has shuffled around to get this pipeline approved, and the money they have spent to try to make it look like a good thing to Lancaster County Residents, is shameful. (277)

Response: The comment is outside of the scope of proposed Air Quality Plan Approval.

Comment 57. A commentator stated it is ironic to me that Volkswagen must buy back my Jetta Sportwagen, and that the commercialization of NOx credits is being considered as being viable. (278)

Response: DEP thanks the commentator for the comment, but the comment is outside of the scope of proposed Air Quality Plan Approval.

Comment 58. The commentator want Williams to delay the start of the construction of the Atlantic Sunrise Pipeline until January of 2018 to reduce emissions during the ozone season. (335)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the proposed Air Quality Plan Approval. The ozone season for Pennsylvania is March through October of any given calendar year. Additionally, the company is not legally required to delay the project, the ERCs will offset emissions from the project, and DEP has determined that no NAAQS violations will occur.

Comment 59. The commentator stated that portions of the Atlantic Sunrise Pipeline Project which runs through certain citizens' property violates the religious freedom of those citizens whom are protected by the Religious Freedom Restoration Act. (323)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval. The use of ERCs are intended to offset the emissions from this project to prevent further degradation of the air quality in Lancaster County. Moreover, the commentator has not demonstrated how the approval of the ERCs for this project violates the Religious Freedom Restoration Act.

Comment 60. The commentator stated that the federal government recognizes that pipelines are the safest method for transporting energy. (344)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 61. The commentator stated that the Atlantic Sunrise Pipeline Project runs across geologically hazardous zones that make it dangerous to locate a pipeline. (347)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval. Moreover, this issue was addressed during the FERC approval process.

Comment 62. The commentator expressed general concerns about the safety of the pipeline. (312, 314)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval. Moreover, this issue was addressed during the FERC approval process.

Comment 63. The commentator stated that the laborers working on the Atlantic Sunrise Pipeline Project are committed to safe construction practices. (344, 348, 349, 351, 353)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 64. The project will provide multiple economic benefits to the Commonwealth and/or well-paying jobs to Pennsylvania residents. (338, 343, 344, 345, 346, 349, 351)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 65. The commentator states that the Atlantic Sunrise Pipeline Project balances energy needs with Pennsylvania environmental conservation goals. (345)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 66. Commentator expressed general concerns about environmental issues confronting society. (313)

Response: DEP thanks the commentator for their concerns. The general concerns, however, are out of the scope of the proposed Air Quality Plan Approval. DEP shares those concerns affecting DEP's mission to protect public health and the environment.

Comment 67. Commentator expressed concern over DEP's planning and permitting regarding unconventional natural gas drilling and pipelines. (297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 321, 322)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval.

Comment 68. The commentator stated that the DEP should consider a recent court case, *Sierra Club et al. v. FERC*, case number 16-1329, in the U.S. Court of Appeals for the District of Columbia Circuit, and deny the permit based on the decision. (336)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval. The case cited by the commentators relates to FERC's approval of pipelines in the southeastern United States and the emission greenhouse gases. It is not applicable to this action which is limited solely to the review and approval of the ERC plan approval application for non-greenhouse pollutants.

Comment 69: The commentator requests that at least a 30-day extension is provided to the public to allow for public review of all materials on DEP's pipeline portal for this plan. (297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval.

Comment 70: The commentator stated that DEP should install more monitors to monitor more parameters. (297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval. Lancaster County currently has ambient air quality monitoring for both the Ozone and PM2.5 NAAQS at two sites ("Lancaster" and "Lancaster Downwind"). This monitoring is EPA approved to collect data sufficient to demonstrate the attainment and/or maintenance of both the Ozone and PM2.5 NAAQS. The Lancaster Site also monitors concentrations of PM10, select toxic metals (including lead), toxic VOCs, and carbonyl compounds.

Comment 71. Before the Department makes a final decision on the Chapter 105 and 102 permit applications, the applicant should be required to provide the Department with revised and complete water resource inventory and impact assessment information. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval.

Comment 72. FERC's review of the socioeconomic impacts associated with the Atlantic Sunrise Project was insufficient. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval. Moreover, this issue was addressed during the FERC approval process.

Comment 73. Commentator requests Governor Wolf and Secretary McDonnell deny the Projects Chapter 105 and 102 water permits. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is an Air Quality Plan Approval.

Comment 74. DEP should deny the air plan approval application to retire ERCs because PADEP has allegedly discontinued NOx monitoring in Lancaster. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval. Lancaster County currently has ambient air quality monitoring for both the Ozone and PM2.5 NAAQS at two sites (“Lancaster” and “Lancaster Downwind”). This monitoring is EPA approved to collect data sufficient to demonstrate the attainment and/or maintenance of both the Ozone and PM2.5 NAAQS. The Lancaster Site also monitors concentrations of PM10, select toxic metals (including Lead), toxic volatile organic compounds (VOC), and carbonyl compounds.

Comment 75. Degraded air quality in Pennsylvania is causing harm to waterways, air and public health, which will be exacerbated if PADEP permits another large pipeline that will allegedly exacerbate and cause more fracking pads to be built. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 76. New LNG export terminals could significantly deplete American natural gas supplies within a little more than three decades. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 77. PADEP must consider segmentation and cumulative impacts in order to protect Pennsylvania’s air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment. (321, 324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

See also the response to Comment 6.

Comment 78. The Atlantic Sunrise Pipeline project would facilitate building proposed natural gas power plants. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 79. DEP should deny the air plan approval based upon the recent supersedeas issued and settlement entered by the Pennsylvania Environmental Hearing Board temporarily halting HDD drilling along the Mariner East 2 pipeline. (321, 324, 325, 326, 327, 328, 329, 330, 331, 332)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 80. The DEP should examine the Key Log economic report commissioned by the Sierra Club for the Atlantic Sunrise that they put on record for this project on March 6, 2017, which outlines the true costs of this project. (321)

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Comment 81. Commentator states to have recently uncovered via the Freedom of Information Act (FOIA) a major omission by FERC and its applicant for the Orion pipeline project. Commentator asserts that "this type of review" is necessary by PADEP in light of what appears to be a blatant omission in the alternatives analysis which, in the commentator's opinion, could have eliminated the need for the Orion pipeline expansion project in the first place.

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval. Furthermore, the commentator gives no specificity on what "this type of review" is or pertinent details on the claim of a "major omission" by the builders / operators of the Orion pipeline.

Comment 82. Commentator believes it is not acceptable, as is currently being proposed by Pennsylvania elected officials under proposed HB 542, HB 118, and HB 453 tied to the budget, that we further out-source or streamline permitting to give the industry even more control in the state and put time clocks on an already strapped PADEP staff to have to review and decide on a permit in a short timeframe. Commentator believes this infringes on the environmental rights of Pennsylvanians.

Response: DEP thanks the commentator for the comment, but the comment is beyond the scope of the topic, which is a proposed Air Quality Plan Approval.

Table of Commentators and Affiliation

ID	Name	Affiliation
1	George Plummer	Private Citizen
2	Sharon Wushensky	Private Citizen
3	Ryan Dodson	Private Citizen
4	Tina Darden	Private Citizen
5	Rex Grubb	Private Citizen
6	Sean McCarson	Private Citizen
7	Van Knox	Private Citizen
8	Ami Trost	Private Citizen
9	Cassandra Scales	Private Citizen
10	Mark Strassle	Private Citizen
11	Laurel Campbell	Private Citizen
12	Charles Leidig	Private Citizen
13	Peggy Dawson	Private Citizen
14	Sandra Liss	Private Citizen
15	Wendy Shuman	Private Citizen
16	L. K. Castaneda Cordero	Private Citizen
17	Deborah Smith	Private Citizen
18	Robert Norcini	Private Citizen
19	R. Woodward	Private Citizen
20	H Peters	Private Citizen
21	Margaret Miros	Private Citizen
22	Joni Hauck	Private Citizen
23	Amy Brenneman	Private Citizen
24	Misty Brown	Private Citizen
25	Lindsey Frazer	Private Citizen
26	Lydia Brubaker	Private Citizen
27	Susan Porter	Private Citizen
28	Betty Pitcherella	Private Citizen
29	Felice Burstein	Private Citizen
30	Nancy Harkins	Private Citizen
31	Lisa Ryder	Private Citizen
32	Barbara Horst	Private Citizen
33	Clayton Kleinfelter	Private Citizen
34	David Bressler	Private Citizen
35	Faye Donovan	Private Citizen
36	Dan M. Dewer	Private Citizen
37	Margaret Pattishall	Private Citizen

ID	Name	Affiliation
38	Jean Gerdes	Private Citizen
39	Debra Mobile	Private Citizen
40	Joanne Leatherman	Private Citizen
41	Kathy Robinson	Private Citizen
42	Emily West	Private Citizen
43	Richard Fox	Private Citizen
44	Jason Crawford	Private Citizen
45	Linda Grant	Private Citizen
46	Terry Brown	Private Citizen
47	Charlotte Whiting	Private Citizen
48	Suzanne Solodky	Private Citizen
49	Peggy Hartzel	Private Citizen
50	Donald and Joan MacKenzie	Private Citizen
51	Eileen Stewart	Private Citizen
52	Genieve Bullock	Private Citizen
53	Anne Pinkerton	Private Citizen
54	Tyler Graham	Private Citizen
55	Tim Hoy	Private Citizen
56	Dennis Shumaker	Private Citizen
57	Daniel Mink	Private Citizen
58	Jessica Morrison	Private Citizen
59	Sam Miller	Private Citizen
60	Gail Richert	Private Citizen
61	Jessica Haag	Private Citizen
62	Susan Harnish	Private Citizen
63	Lori Montgomery	Private Citizen
64	Matthew Glinn	Private Citizen
65	Rachel Saviano	Private Citizen
66	Margaret Beitzel	Private Citizen
67	Reed Auker	Private Citizen
68	Andrew Mix	Private Citizen
69	Sara Ream	Private Citizen
70	Melissa Farr	Private Citizen
71	Nathan Van Velson	Private Citizen
72	Lorraine Heagy	Private Citizen
73	Dennis Keller	Private Citizen
74	Elaine P. Frost	Private Citizen
75	Raymond Dandrea	Private Citizen
76	Bob Dahmd	Private Citizen
77	Tom Kahler	Private Citizen

ID	Name	Affiliation
78	Lorna Milano	Private Citizen
79	Lucinda Slotcavage	Private Citizen
80	E Madarasz	Private Citizen
81	Seth Morth	Private Citizen
82	Janet Kreiner	Private Citizen
83	Ellen Kutter	Private Citizen
84	Myra Ober	Private Citizen
85	Bernard La Pine	Private Citizen
86	Gus Sinadinos	Private Citizen
87	Lisa Geyer	Private Citizen
88	Jim Gallagher	Private Citizen
89	Janet Davis	Private Citizen
90	Lani Frank	Private Citizen
91	Adele Juzi	Private Citizen
92	Brian Earley	Private Citizen
93	Mary Ellen Neumann	Private Citizen
94	Kathy Robb	Private Citizen
95	Alan Chronister	Private Citizen
96	Sheryl Schultz	Private Citizen
97	Sondra Wolferman	Private Citizen
98	Kathleen Brader	Private Citizen
99	Ellis Coleman	Private Citizen
100	Carol Jones	Private Citizen
101	Jim Stokes	Private Citizen
102	Kayla Hill	Private Citizen
103	John Saunders	Private Citizen
104	James Hanson	Private Citizen
105	Joe Gasparovic	Private Citizen
106	Robert D Missimer Jr	Private Citizen
107	William Dempsey	Private Citizen
108	Sharon Newman	Private Citizen
109	Carrie Doyle	Private Citizen
110	Barbara J Spiegelberg	Private Citizen
111	Dennis Bowers	Private Citizen
112	Kelly Rogers	Private Citizen
113	Stephan Bihoreau	Private Citizen
114	Katherine Thorwart	Private Citizen
115	Sarah Caspar	Private Citizen
116	Gregory Confer	Private Citizen
117	George Denlinger	Private Citizen

ID	Name	Affiliation
118	Lisa Gares	Private Citizen
119	Kent Vendrick	Private Citizen
120	Carole Hovis	Private Citizen
121	Kay Reinfried	Private Citizen
122	Glenn Frantz	Private Citizen
123	Jay Zimmermann	Private Citizen
124	Karen Erb	Private Citizen
125	Frank Peachey	Private Citizen
126	Elliott Seavey	Private Citizen
127	William Middleton	Private Citizen
128	Glenda Johnson	Private Citizen
129	Kelly Matthews	Private Citizen
130	Eloise Robbins	Private Citizen
131	Judy Hutton	Private Citizen
132	Matt Miskie	Private Citizen
133	Val Coulson	Private Citizen
134	Michelle Redcay	Private Citizen
135	Aggie Perilli	Private Citizen
136	Nicole P	Private Citizen
137	John Nicolella	Private Citizen
138	Helen Warnke	Private Citizen
139	Sheila Sykes-Gatz	Private Citizen
140	Carolyn Van Zandt	Private Citizen
141	Mark Erickson	Private Citizen
142	Robert Kline	Private Citizen
143	Suesie Hartman	Private Citizen
144	Mike Mutchler	Private Citizen
145	Linda Berndt	Private Citizen
146	Patricia Johnson	Private Citizen
147	Robert Schulz	Private Citizen
148	William Nelson	Private Citizen
149	Cheryl Whittaker	Private Citizen
150	Cathy Difilippo	Private Citizen
151	M Rotondi	Private Citizen
152	Judy Springer	Private Citizen
153	James Gibbel	Private Citizen
154	Carol Sandt	Private Citizen
155	Nicola Nicolai	Private Citizen
156	David Macpherson	Private Citizen
157	Laura Boyer	Private Citizen

ID	Name	Affiliation
158	Rena Grimmer	Private Citizen
159	Lisa McNichol	Private Citizen
160	Carol Deem	Private Citizen
161	Richard Tregidgo	Private Citizen
162	Frances Homer	Private Citizen
163	Karen Beall	Private Citizen
164	David Harnish	Private Citizen
165	Jackie Palmer	Private Citizen
166	Louis Martin	Private Citizen
167	Susan Schulz	Private Citizen
168	Tom Bejgrowicz	Private Citizen
169	Kevin Joyce	Private Citizen
170	George Klaes	Private Citizen
171	David Hoffman	Private Citizen
172	Elyn Haden	Private Citizen
173	Elsa Russell Lichtenberg	Private Citizen
174	Roberta Michaelis	Private Citizen
175	Jasper and Lindsay Brinton	Private Citizen
176	Holly Williams	Private Citizen
177	Doug Snavelly	Private Citizen
178	Jennifer Zielinski	Private Citizen
179	Barbara Rowley	Private Citizen
180	Barbara Knickerbocker	Private Citizen
181	Kathleen Rengert	Private Citizen
182	Carol Molyneaux	Private Citizen
183	Jesse Landis	Private Citizen
184	William Bondinell	Private Citizen
185	Mark Bodenhorn	Private Citizen
186	Valerie Gould	Private Citizen
187	Angela Meister	Private Citizen
188	Adam Kapp	Private Citizen
189	Steven Zserai	Private Citizen
190	Bernard Greenberg	Private Citizen
191	Melody Alexander	Private Citizen
192	Ted Woods	Private Citizen
193	Janet Beaver	Private Citizen
194	Margaret Beitzel	Private Citizen
195	Phyllis Chambers	Private Citizen
196	Brenda Eisenhauer	Private Citizen
197	Elizabeth Janoski	Private Citizen

ID	Name	Affiliation
198	Richard Doughty	Private Citizen
199	Pamela Utterback	Private Citizen
200	Kris Ohlinger	Private Citizen
201	Paul Waldeier	Private Citizen
202	Chuck Oatman	Private Citizen
203	Beatrice Broughton	Private Citizen
204	Linda Reichert	Private Citizen
205	William Montgomery	Private Citizen
206	Margaret Beitzel	Private Citizen
207	Eleanor Conwell	Private Citizen
208	Nicole Heinaman	Private Citizen
209	Daniel Diehl	Private Citizen
210	Raymond Kasper	Private Citizen
211	Lisa Pauley	Private Citizen
212	Robin Lason	Private Citizen
213	Mary Jo Keiter	Private Citizen
214	Caroline Tranie	Private Citizen
215	Sandra Liss	Private Citizen
216	Mike Dellapenna	Private Citizen
217	Kim Telgarsky	Private Citizen
218	Adam Mathews	Private Citizen
219	Tracey Lord	Private Citizen
220	Collette Twyman	Private Citizen
221	Margaret Hudgings	Private Citizen
222	Donald Robinson	Private Citizen
223	Todd Morris	Private Citizen
224	Douglas Campbell	Private Citizen
225	Susan Randle	Private Citizen
226	Lisa Berkery	Private Citizen
227	Dale Melton	Private Citizen
228	John Ramirez	Private Citizen
229	Barry Blust	Private Citizen
230	Marlene Warkoczewski	Private Citizen
231	Ann Waters	Private Citizen
232	Jill Steinig	Private Citizen
233	Veronica Farmer	Private Citizen
234	C Gerald Chetkowski	Private Citizen
235	Robert Bruckman	Private Citizen
236	Carlin Wenger	Private Citizen
237	Alex Galante	Private Citizen

ID	Name	Affiliation
238	Alexander Hoffer	Private Citizen
239	Sandra Moriarity	Private Citizen
240	Gary Cubler	Private Citizen
241	Laura Woodward	Private Citizen
242	Tom Torres	Private Citizen
243	Christopher Huffman	Private Citizen
244	Magali Tranie	Private Citizen
245	Eva Telesco	Private Citizen
246	J White	Private Citizen
247	Susan Bruegel	Private Citizen
248	Lawrence Barardi	Private Citizen
249	Robin Devaney	Private Citizen
250	Brenda Milligan	Private Citizen
251	Katherine Boas	Private Citizen
252	Kimberly Fedornak	Private Citizen
253	Janet Parlett	Private Citizen
254	Virginia Newlin	Private Citizen
255	John Ambler	Private Citizen
256	Carol Armstrong	Private Citizen
257	Robert Fox	Private Citizen
258	Alexa Manning	Private Citizen
259	Jody Zwick	Private Citizen
260	Debra Goodridge	Private Citizen
261	Pamela Peters	Private Citizen
262	Barbara Lowe	Private Citizen
263	Joan Bristol	Private Citizen
264	Joseph Erdeljac	Private Citizen
265	Melinda Mohoski	Private Citizen
266	Diane Snyder	Private Citizen
267	Anne Sensenig	Private Citizen
268	Diana Hill	Private Citizen
269	Maryann Maurer	Private Citizen
270	Brinton Culp	Private Citizen
271	Judith Mills	Private Citizen
272	Janet Vokoun	Private Citizen
273	Ellen Welch	Private Citizen
274	Rachel Noll	Private Citizen
275	A Boullianne	Private Citizen
276	Bill Murdock	Private Citizen
277	Kathy Musser	Private Citizen

ID	Name	Affiliation
278	Laura McCann	Private Citizen
279	G Brainard	Private Citizen
280	Devin Barta	Private Citizen
281	Ricki Hurwitz	Private Citizen
282	James Stokes	Private Citizen
283	Pamela Bishop	Private Citizen
284	Veda Maany	Private Citizen
285	Michael Eshleman	Private Citizen
286	Susan Brede	Private Citizen
287	Frances Demillion	Private Citizen
288	Dr. Alan Peterson, MD	Private Citizen
289	Donna Eby	Private Citizen
290	Barbara Hegedus	Private Citizen
291	Joan Groff	Private Citizen
292	Marion Menapace	Private Citizen
293	Larry Berardi	Private Citizen
294	Leah Zerbe	Private Citizen
295	Jennifer Wentzel	Private Citizen
296	Richard Cooper	Private Citizen
297	Dean Hawkey	Private Citizen
298	Steven Hvozdoovich	Private Citizen
299	Sondra Wolferman	Private Citizen
300	Paula Lim	Private Citizen
301	Faith Zerbe	Private Citizen
302	Nina Baker	Private Citizen
303	Gokhan Seker	Private Citizen
304	Lynell Antonelli	Private Citizen
305	Ann Dixon	Private Citizen
306	Adrienne Morgado	Private Citizen
307	Elizabeth A. Roedell	Private Citizen
308	Carla Kelly - Mackey	Private Citizen
309	Carmella Hart	Private Citizen
310	Chloe Wang	Private Citizen
311	Bonnie Stoeckl (biker46@yahoo.com)	Private Citizen
312	Lois Chamness	Private Citizen
313	Gene Brown	Private Citizen
314	Blair Mohn	Private Citizen
315	Anne Sensenig	Private Citizen
316	Brian Earley	Private Citizen

ID	Name	Affiliation
317	Brenda Lee Sieglitz	Private Citizen
318	Brenda Kauffman	Private Citizen
319	Eileen Nikolaus	Private Citizen
320	Doug Snavely	Private Citizen
321	Maya K. van Rossum & Faith Zerbe	Delaware River Keeper Network
322	Elise Kucirka Salahub	Private Citizen
323	Sheila O'Rourke	Gibbel, Kraybill and Hess LLP for the Adorers of the Blood of Christ
324	Elly Benson	Sierra Club -Washington, DC
325	Joanne Kilgour & Thomas Au	Sierra Club - Pennsylvania Chapter
326	Malinda Clatterbuck	Lancaster Against Pipelines
327	Joseph Otis Minott	Clean Air Council
328	Alice R. Baker	PennFuture
329	Leah Zerbe	Schuylkill Pipeline Awareness
330	Betsy Nicholas	Waterkeepers Chesapeake
331	Pamela Bishop	Concerned Citizens of Lebanon County
332	Ann Pinca	Lebanon Pipeline Awareness
333	William A. Lochstet	Private Citizen
334	Ann Pinca	Private Citizen
335	Rickey and Jolene Garvin	Private Citizen
336	Faith Zerbe	Delaware Riverkeeper Network
337	Elisabeth Hoffman	Private Citizen
338	Kevin Sunday	PA Chamber of Business and Industry
339	Kathy O'Brien	Private Citizen
340	Pat Lemay	Private Citizen
341	Jim Sandoe	Private Citizen
342	Tim Spiese	Lancaster Against Pipelines
343	Joseph Barone	ShaleDirectories
344	David N. Taylor	Pennsylvania Manufacturers Association
345	Michael Butler	Consumer Energy Alliance
346	Stephanie Wissman	API Pennsylvania
347	Jay Parrish	Private Citizen
348	Abe Amoros	Laborers International Union of North America
349	David Butterworth	Pipeliners Local 798
350	Pat Lemay	Private Citizen
351	Charles Eveson	Private Citizen
352	Dave Smith	Clean Air Council
353	Paul McCormick	International Union of Operating Engineers

ID	Name	Affiliation
354	Gale Hess	Private Citizen
355	Linda Like	Private Citizen