



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

***Columbia Gas Transmission, LLC
Milford Compressor Station
Plan Approval 52-00001A***

***Response to Public Testimony
Received at Public Hearing on August 18, 2014***

January 14, 2014

Department of Environmental Protection

www.depweb.state.pa.us

Below are two tables that identify individuals who provided comments on proposed Air Quality Plan Approval No. 52-00001A for the Columbia Gas Transmission, LLC Milford Compressor Station. Table 1 identifies people who presented oral testimony at the public hearing and Table 2 identifies individuals who submitted written comments to the Department. Responses to the comments are provided below the tables.

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

ID	Name	Affiliation	e-mail address
1	Bess Moran	Private Citizen	souli16@yahoo.com
2	Anthony Magnotta	Milford Twp. Solicitor	anthony@magnottalaw.com
3	Nancy Shanley	Private Citizen	nshanleyz81@gmail.com
4	Justin Snyder	Private Citizen	Justin.Snyder@premierTurbines.com
5	Ronald Feldman	Private Citizen	rafi@columbia.edu
6	Don Quick	Chairman, Milford Twp. Supervisors	RedGate241@live.com
7	William Huston	Private Citizen	willaimahuston@gmail.com
8	Linda Reik	Private Citizen	lmreik@msn.com
9	Gary Clark	Milford Twp. Board of Supervisors	idratherbefishing520@hotmail.com
10	Mason Bolt	Private Citizen	zbolt@earthlink.net
11	Herb Meyerson	Private Citizen	herbriver@msn.com
12	Edson Whitney	Private Citizen	twinlakes75@gmail.com
13	Albert Waldman, M.D.	Private Citizen	awaldmanmd@gmail.com
14	Shirley Masuo	Damascus Citizens for Sustainability	shirleym@ptd.net
15	John Passaro	Private Citizen	jpassaro@ptd.net
16	Greg Lotoro	Private Citizen	lotorto@ptd.net
17	Wendy Goetz	Private Citizen	wendieswords@yahoo.com
18	Walter Martin	Private Citizen	walterm@earthlink.com
19	Charlotte Lewis	Student	bookwormearthworm@gmail.com
20	Amy Bruce	Private Citizen	amyb7457@gmail.com
21	Kevin Stroyan	Private Citizen	

22	Joseph Zenes	Private Citizen	pocojoe@ptd.net
23	Sam Koplinka-Loehr	Clean Air Council	skl@cleanair.org
24	Adam Hasz	Private Citizen	adam.hasz@sustainus.org
25	Marie Liu	Private Citizen	mliuart@yahoo.com
26	Joline DeFeis	Private Citizen	jolie_defeis@hotmail.com
27	Linda Klee	Private Citizen	lindaklee@optonline.net
28	Alex Lotorto	Private Citizen	alotorto@gmail.com
29	Allison Petryk	Private Citizen	allisonpetryk@gmail.com
30	Marvin Fiel	Private Citizen	mfeil@writeme.com
31	Ruby Willis	Private Citizen	mypointofhue@gmail.com
32	Lenore Fasula	Private Citizen	fasula2@gmail.com
33	Bonnie Lafi	Private Citizen	bonniel@coldwellbanker.com
34	Tara Diefenbach	Private Citizen	esqtara@gmail.com
35	Janice Carrarie	Private Citizen	jcurreri@hotmail.com
36	Shawn Strub	Private Citizen	sean.strub@gmail.com
37	Rachael Hendrix	Private Citizen	raufhendricks@gmail.com
38	Debbie Hastings	Private Citizen	debhastings@gmail.com
39	Ken Collins	Private Citizen	worldwiderebel1@gmail.com
40	Bob Dew	Private Citizen	

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

ID	Name	Affiliation	e-mail address
41	Barbara and Edson Whitney	Private Citizen	twinlakes75@gmail.com
42	George La Fe'	Private Citizen	bonniel@coldwellbanker.com
43	Nancy McSweeney	Private Citizen	nancyinwayne@aol.com

44	John McSweeney	Private Citizen	IMSJMcS@aol.com
45	Robert LeMay Jr.	Private Citizen	lamuffs@yahoo.com
46	Shannon LeMay	Private Citizen	mcsweenz@hotmail.com
47	Megan Fuller	Private Citizen	vanilla.wafers@gmail.com
48	Joanna Longo	Private Citizen	markandjlo@optonline.net
49	Karen Anderson	Private Citizen	karenacrown@yahoo.com
50	Wendy Goetz	Private Citizen	wendieswords@yahoo.com
51	Kristina Turechek	Private Citizen	turechkw@oneonta.edu
52	Anne Marie Balog	Private Citizen	shantispirit23@live.com
53	Vera Scroggins	Private Citizen	veraduerga@yahoo.com
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55	Anne Brodeen	Private Citizen	abrodeen@ptd.net
56	Pawel Kedzior	Private Citizen	pawel.kedzior@aecom.com
57	Mary Rial	Private Citizen	maryrial@yahoo.com
58	Patricia Wheelhouse	Private Citizen	pathouf@yahoo.com
59	Elizabeth Watts	Private Citizen	elizabeth.watts@verizon.net
60	David LaVerne	Private Citizen	backpack2@comcast.net
61	Anjolie Diaz	Private Citizen	anjldiaz@gmail.com
62	Maureen Hickey	Private Citizen	Maureenhickey1@gmail.com
63	Anne Ryan	Private Citizen	annejr@echoes.net
64	Bonnie La Fe'	Private Citizen	bonniel@coldwellbanker.com
65	Paloma Munoz	Private Citizen	palitom@earthlink.net
66	Judy Rossi	Private Citizen	judy@ptd.net

67	Anca Pulis	Private Citizen	a.tusinean@gmail.com
68	David Woda	Private Citizen	dovid16@verizon.net
69	Margo Lewis	Private Citizen	margolewis@yahoo.com
70	Deborah Hastings	Private Citizen	debhastings@gmail.com
71	Jack Neff	Private Citizen	jackneff01@yahoo.com@
72	Dawn Ashinoff	Private Citizen	Dawnash@verizon.net
73	Spencer Johnson	Private Citizen	ithutchjohnson@gmail.com
74	Patricia Aldredge	Private Citizen	amie@ptd.net
75	Pam Mills	Private Citizen	pam42569@aol.com
76	Joel Wilkinson	Private Citizen	joelwilk@mac.com
77	Stephanie Snyder	Private Citizen	stephsnyder4@yahoo.com
78	Justin Snyder	Private Citizen	jksnyder22@yahoo.com
79	Richard Snyder	Private Citizen	rls@sql.ms
80	Rene'e Hoover	Private Citizen	reneemaryhoover@yahoo.com
81	Pike County Democratic Committee	Pike County Democratic Committee	chair@pikecountymocrats.org
82	Bess Moran	Private Citizen	souli16@yahoo.com
83	Allison Petryk	Private Citizen	allisonpetrk@gmail.com
84	Janice Curreri	Private Citizen	jcurreri@hotmail.com
85	Jessica Cohen	Private Citizen	asatess@pa.net
86	Michael Trennerer	Private Citizen	twozoots@earthlink.net
87	Marie Cantanese	Private Citizen	2thecats3@gmail.com
88	Joseph Otis Minott, Esq.	Executive Director, Clean Air Council	www.cleanair.org

On June 28, 2014, the Department of Environmental Protection (“Department”) published in *The Pennsylvania Bulletin* a Notice of Intent to Issue Plan Approval No. 52-00001A for Columbia Gas Transmission, LLC (“Columbia”) to modify the Milford Compressor Station in Milford Twp., Pike County, as described in the Columbia January 17, 2014 Plan Approval Application and supplemental submissions. The proposed Plan Approval authorizes the construction of two (2) Solar Model Centaur 40-4700S natural gas fired compressor turbines equipped with Solar’s lean-premixed dry low emissions system (SoLoNO_x) to control and reduce NO_x emissions during normal operating conditions, and an emergency generator. The turbines will be used to maintain pressure of natural gas along the gas pipeline.

A number of comments were received during a 30-day written comment period following publication of the Department’s Notice of Intent to Issue. During that comment period, the Department received requests to conduct a public hearing. On August 18, 2014, the Department held a public hearing at the Delaware Valley High School concerning proposed Plan Approval No. 52-00001A for the Milford Compressor Station. The hearing was advertised in a local newspaper of general circulation.

During the public hearing, representatives from NiSource, Inc., on behalf of Columbia Gas Transmission, LLC, and representatives from the Department presented information about the proposed project and listened to comments from the public. Forty (40) individuals presented testimony at the public hearing. This document briefly summarizes the testimony presented during the public hearing and provides the Department’s response to relevant comments received. The comments are not intended to be a complete summary of each individual’s testimony; but rather to identify the issue or comment raised and provide the context for the Department’s response. The testimony of each individual was transcribed, is available in its entirety at the Department’s Northeast Regional Office, and may be accessed by any person wishing to review it by scheduling a file review with the Department at (570) 826-2511.

Public Comments and Department Responses

1. Comment: *Commenter(s) expressed concern(s) that the company must include best available technology (“BAT”) and standards in order to prevent toxic emissions in the residential area where this compressor station would be located. (1, 4, 5, 8, 9, 10, 14, 15, 17, 18, 19, 20, 24, 25, 28, 29, 31, 34, 37, 39, 41- 82, 84, 85, 86, 87)*

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

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

2. Comment: *Commenter(s) questioned what are the cumulative health effects from all emission sources associated with natural gas development that may have an impact. (3, 5, 8, 9, 13, 15, 17, 18, 23, 24, 27, 28, 29, 33, 34, 36, 37, 40, 83 and 85)*

Response: EPA has established National Ambient Air Quality Standards (“NAAQS”) for six principal pollutants, which are called “criteria” pollutants, for the protection of public health and welfare. The six criteria pollutants are carbon monoxide, lead, nitrogen dioxide, ozone, particle pollution, including PM 10 and PM 2.5, and sulfur dioxide. Primary NAAQS provide public health protection, including protection for the health of “sensitive” populations such as asthmatics, children, and the elderly. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

States are given primary responsibility for achieving the NAAQS through State Implementation Plans (“SIPs”). Under Section 110 of the federal Clean Air Act (42 U.S. Code § 7410), states are required to develop SIPs that provide for implementation, maintenance, and enforcement of the NAAQS, and those SIPs include provisions for the permitting of new and modified sources. States like Pennsylvania are to review and issue permits for minor new sources and minor modifications, such as those proposed at the Milford Compressor Station, under their approved SIPs. These SIP requirements under

Section 110 of the CAA, as well as the associated regulations, are intended to ensure the protection of the NAAQS, and therefore public health and welfare.

Protection of the NAAQS is maintained, in part, through the Department's BAT requirements during the permitting process. Plan approval applicants, including those for minor modifications such as what is being proposed at the Milford facility, are required to show that emissions will be the minimum attainable using BAT. *See* 25 Pa. Code §§ 127.1 and 127.12. Adherence to these BAT requirements, as well as the other requirements in the Plan Approval and applicable state and federal regulations, will help ensure that the modifications at the Milford facility do not have a significant impact on regional air quality.

The implementation of Pennsylvania's approved SIP provisions and permitting requirements is a systematic way to ensure protection of NAAQS and public health and welfare. Engaging in a speculative analysis about the possibility of future proposed development and its impacts on air quality in a particular area is much less certain and is not likely to provide meaningful information to assist in addressing cumulative impacts.

3. Comment: *Commenter(s) expressed concerns over noise from the compressor station and the preservation of quiet in the community. (4, 5, 10, 13, 14, 18, 25)*

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

4. Comment: *Commenter(s) were concerned about odorous emissions coming from this facility. (4, 18, 22, 30, 33, 35, 37)*

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

5. Comment: *Commenter(s) were concerned about venting (blowdowns and rerouting) from the facility. (17, 18, 28, 39, and 41-85)*

Response: To protect the public, company personnel, and property, all compressor stations are equipped with safety devices. When compressor stations are taken offline for maintenance or the system shuts down for other reasons, the gas within the compressors and associated piping is either manually or automatically vented to the atmosphere. When a vent valve is open, it is typically referred to as a "blowdown". Emergency shutdown (ESD) systems are also designed to automatically evacuate vapors from sensitive areas during plant emergencies and shutdowns. Because of the required venting, some noise can result from

compressor maintenance, activation, or ESD system testing. Whenever practicable, station blowdowns will occur during daylight hours with blowdown gas routed through blowdown silencers. Venting in these limited circumstances is considered to be a safe way to remove gas from the system quickly so that it does not collect and create an ignition danger.

Commenters suggested that Columbia should be required to reroute gas as suggested under the Natural Gas STAR Program, rather than vent gas from the system during emergency shutdowns or when the station is taken off line. The Natural Gas STAR Program and adherence to its recommendations is a voluntary program and not mandated by law. Columbia has indicated that it believes its selection of Solar Turbines equipped with dry gas seals are effective at eliminating equipment leaks and maintaining pressurization under certain scenarios, which will help to reduce minor blowdown events and fugitive emissions. As stated below in response to Comment No. 12, the Department has placed a condition in the Plan Approve that requires the company to develop a leak detection and repair (“LDAR”) program and perform LDAR monitoring. The Plan Approval also requires that the turbines be constructed, operated and maintained in accordance with manufacturers’ specifications and that Columbia performs adjustments and/or tune-ups as specified by the manufacturer. These measures will help to reduce discharges from the system.

6. Comment: *Commenter(s) asked whether DEP is monitoring emissions from this facility (22 and 30).*

Response: The proposed Plan Approval includes a requirement for detailed emission testing within 180 days of startup of the project to verify NO_x, CO, VOCs, and PM/PM10 emission rates and compliance with limits in the Plan Approval. The emissions testing will be conducted pursuant to a protocol that is submitted to, reviewed and approved by the Department. While the testing is being conducted, the Department often sends an observer to attend the testing to help ensure that it is being conducted in accordance with the protocol as approved.

In addition to the initial testing, the terms and conditions of the Plan Approval incorporate testing by reference to applicable regulatory requirements in 40 C.F.R. Part 60, Standards of Performance for New Stationary Sources, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines.

The Department is also now requiring additional NO_x and CO emissions testing every 2,500 hours of operation of these turbines. A portable gas analyzer may be used to satisfy the requirements of this condition. The additional testing requirements have been included in the Plan Approval.

7. Comment: *Commenter(s) concerned about possible PCB’s (8, 17, 31)*

Response: As is the case at the existing Milford Compressor Station, the proposed equipment at the modified facility will combust only pipeline quality natural gas which has inherently low emissions of any regulated air pollutant. There are not expected to be any PCB air emissions from any of the sources in the Plan Approval. With regard to the presence of any existing PCBs in soils at the site, the Department’s records show that the Milford Compressor Station was assessed for

PCBs and other parameters in 1999 and PCB concentrations were not found to be in excess of the appropriate statewide health standards. Site characterization reports are on file in the Department's Northeast Regional Office in Wilkes-Barre and are available for review.

8. Comment: *Commenter(s) concerned about property values. (1, 3, 4, 10, 33, 82 and 86)*

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

9. Comment: *Commenter(s) concerned about tourism. (16, 25)*

Response: Please refer to Response No. 8 above.

10. Comment: *Commenter(s) concerned about economic growth. (1, 9, 18, 19, 25, 36 and 82)*

Response: Please refer to Response No. 8 above.

11. Comment: *Commenter(s) concerned about possible leaks and how to test for them. (22, 30)*

Response: The Department has placed a condition in the Plan Approve that requires the company to develop a leak detection and repair ("LDAR") program and perform LDAR monitoring. The LDAR monitoring must be conducted on each pump, valve, relief valve, flange, connector, storage vessel/storage tank, open ended line and compressor seal, if applicable, in natural gas or hydrocarbon liquids service using an optical gas imaging camera such as a FLIR camera or a gas leak detector with low detection levels and a high level of accuracy. If leaks are detected, they must be repaired no later than 15 calendar days from the date of detection, unless facility shutdowns for ordering or replacement parts is necessary for repair of the leak(s). In addition, at a minimum, Columbia Gas is required to perform audible, visual and olfactory inspections on a monthly basis to detect leaks from the equipment. The company is also required to maintain records of all inspections and leak repairs.

12. Comment: *Commenter(s) want any tanks and their emissions included in the permit. (23, 28)*

Response: There are two storage tanks proposed for the Milford Compressor Station that have not been identified as significant sources of emissions. A 1,000-gallon tank will store wastewater and is not expected to have emissions. No VOCs will be contained within this tank. A 2,000-gallon tank will store condensate, also known as pipeline liquids, which are a mixture of low vapor pressure, heavy organic compounds that condense out of the natural gas and are removed from the pipelines. Based on an assumption of 1 turnover per year (2,000 gal/yr), VOC emissions from this tank will be 39.69 lb/yr (0.02 tpy). These tanks are exempt from plan approval requirements under Section 127.14(a) of the Department's Air Resources Regulations, 25 Pa. Code § 127.14(a), and the Department's guidance on Plan Approval and Operating Permit Exemptions, No. 275-2101-003 of July 26, 2003, amended August 10, 2013.

13. Comment: *Commenter(s) have concerns about explosions and emergency plans. (1, 22, 35, 82 and 84)*

Response: Columbia Gas has response plans in place for its Compressor Stations in the event of an emergency. This includes the Milford facility. Columbia Gas also has safety equipment and procedures in place to minimize the chance for any explosions. The Department is generally not considered to be a first responder, like a fire department; however it has included a condition in the Plan Approval that requires Columbia Gas to notify the Department, within one (1) hour of discovery, of an occurrence, any malfunction, record keeping or reporting errors, or other possible non-compliance issues, which are reasonably believed to either result in or possibly result in, or which result in, the emission of air contaminants in excess of limitations specified in, or established pursuant to, any applicable rule or regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection (Air Resources). The Plan Approval also requires a written report to be submitted to the Department within five working days following the initial notification describing the incident and the corrective actions taken or to be taken. The condition further states that the Department may take enforcement action for any violations of applicable standards. The Department also has Emergency Response and Air Quality Program staff that are prepared to address issues as the site, should they occur.

14. Comment: *Commenter(s) expressed concerns over local zoning permits (such as conditional use) from the compressor station. (2, 6, 21, 26)*

Response: In consideration of this concern, the Department has included a condition in the Plan Approval stating: “Nothing in this Plan Approval relieves the facility owner or operator from its obligations to comply with all applicable Federal, state and local laws and regulations.” The issuance of the Plan Approval does not prevent Columbia Gas from having to secure any necessary local land use approvals.

15. Comment: *Commenter(s) state that the Department must consider the increase in actual emissions that will result from the project. (23, 41- 82, 84, 85, 88)*

Response: In evaluating the Plan Approval application the Department reviewed the existing facility’s baseline actual emissions compared to the projected actual emissions of the proposed modifications at the facility. Projected actual emissions were reported using a conservative assumption that the facility would operate for 8,760 hours per year, which is the total number of hours in one year. Based on that comparison, an increase in actual emission is predicted, however the emissions will not reach major source thresholds and the facility is considered to be a minor rather than a major source of emissions. Notably, the facility was previously permitted as a major source of emissions, or a Title V facility, based on its potential to emit. The potential to emit under the major source Title V permit was higher than the facility’s projected actual emissions after the modifications. Therefore, the facility was permitted to emit more prior to the modification. However, because of the facility’s limited operating hours, actual emissions did not reach major source thresholds.

As a point of reference, VOC emissions from the facility will not equal or exceed 50 TPY, based on a 12-month rolling sum. The NO_x emissions from the facility will not equal or exceed 100 TPY, based on a 12-month rolling sum. Total PM, SO₂, and CO emissions from the facility will not equal or exceed 100 TPY, based on a 12-month rolling sum. The HAPs from the facility must never equal or exceed 10 TPY of any single HAP and must never equal or exceed 25 TPY of all aggregated HAPs, based on a 12-month rolling sum. These are all major source threshold criteria. In addition, the Plan Approval and Operating Permit will include testing, monitoring, record keeping and reporting requirements designed to keep the sources operating within all applicable air quality requirements and ensure that emissions are below major source thresholds

16. Comment: *Commenter(s) are concerned about the increase in traffic. (40)*

Response: Traffic is not a component of the Department's air quality permitting process.

17. Comment: *Commenter(s) concerned about quality of life. (1, 18, 29)*

Response: Please refer to Response No. 8 above.

18. Comment: *Commenter(s) state that Columbia has failed to include the lowest emitting technology in the application by choosing to install natural gas engines rather than electric engines. (2, 3, 4, 5, 9, 11, 12, 17, 20, 28, 29, 31, 32, 37, 39, 41-82, 84, 85)*

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

In this case, Columbia Gas has submitted a plan approval application for the installation of two (2) Solar Centaur 40 natural gas-fired compressor turbines, a natural gas-fired emergency generator, ancillary heating equipment and storage tanks at its Milford Compressor Station. Existing equipment at the Milford Compressor Station will be removed from the site. The selection of this equipment was done by Columbia Gas and is permissible. The Department has reviewed and determined that the application addresses applicable State and Federal air quality regulatory requirements, including Best Available Technology requirements to reduce or control emissions to the maximum extent possible. The modification to the compressor station does not trigger major source review under the Nonattainment New Source Review (NNSR) or Prevention of Significant Deterioration (PSD) programs because anticipated emissions are below applicable thresholds (*See* Response to Comment No. 15 above). Equipment in the Plan Approval application does, however, trigger New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP), and the requirements of those standards have been included in the Plan Approval.

In addition, in January 2013, the Department issued a revised General Permit BAQ-GPA/GP-5, General Plan Approval and/or General Operating Permit (GP-5) for natural gas

compression and/or processing facilities. Among the equipment regulated by this general permit are simple-cycle gas turbines. The modifications proposed at the Milford Compressor Station are not eligible for a GP-5 and a plan approval is required. Nevertheless, the Department has used general permits to define BAT and the emission rates in the Milford Plan Approval for the Solar turbines comply with the GP-5 requirements for turbines of this size. Further, as stated above, Columbia Gas has submitted a BAT analysis as part of their plan approval application that confirms that the Solar Turbines do meet Department BAT requirements.

Finally, the Department presented this comment to Columbia Gas and the company indicated that the availability and proximity of suitable electric power is a key consideration in choosing to install electric motor driven compression. Columbia utilized the Rextag/GIS database(s) to determine the proximity of mainline electrical transmission lines to the Milford Compressor Station. From this analysis, Columbia concluded that existing mainline electrical transmission lines are of a distance that would result in infrastructure costs associated with bringing suitable electric service to the Milford Compressor Station that would not support installation of electric motor driven compression. Choosing electric driven compression would require additional environmental impacts associated with construction of the electrical infrastructure to bring power to the Milford Compressor Station, as well as construction of an electrical substation outside the existing station lot. Columbia's proposal will not require construction beyond the existing station lot.

19. Comment: *Commenter(s) request that the Department discharge its duty under Pennsylvania's Environmental Rights Amendment and protect people's right to breathe clean air.*

Article I, Section 27 of the Pennsylvania Constitution reads:

"The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic, and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all of the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people." (3, 7, 14, 16, 17, 24, 26, 27, 29, 31, 32, 34, 35, 38, 83 and 88)

Response: The Department's issuance of this Plan Approval is consistent with applicable statutory and regulatory requirements. These requirements, as well as the considerations undertaken by the Department during its review of the Plan Approval application and inclusion of the terms and conditions in the Plan Approval satisfy Article I, Section 27 of the Pennsylvania Constitution.

20. Comment: *Commenters expressed concerns about potential contamination of local water. (1, 7, 8, 19, 20, 22, 30, 82 and 86)*

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

21. Comment: *Commenter expresses concern over the company having proper waste removal procedures and practices.* (82)

Response: The Milford Compressor Station will have two (2) storage tanks - one (1) will be used to store pipeline condensate collected from the gas transmission process; and one (1) tank will collect any waste water that is generated from floor washing and machine and facility cleaning. The pipeline condensate will be collected periodically and loaded by sealed hose into a tank truck and taken offsite for either proper disposal or to be sold as a pipeline liquid. The waste water tank will likewise be off-loaded into a tank truck via closed hose system and disposed of off-site at a facility that is appropriate for the particular contents from the tank.

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

All other waste or trash will be properly characterized and taken offsite for proper recycling or disposal. No wastes of any kind will be disposed of at the compressor station site.

FINAL DETERMINATION

Pursuant to 25 Pa. Code Chapter 127, all comments submitted during the public hearing have been reviewed and are appropriately addressed in this document. It is the view of the Department that, after consideration of all comments received and revisions to the proposed Plan Approval, the available information indicates Columbia Gas Transmission, LLC's proposed construction of two (2) Solar Model Centaur 40-4700S natural gas fired compressor turbines equipped with Solar's lean-premixed dry low emissions system (SoLoNO_x) at the proposed Milford Compressor Station, located in Milford Township, Pike County will meet the emission limitations and the conditions set forth in the Plan Approval and will comply with all applicable State and Federal air quality regulatory requirements.

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