

COASTAL CHEMICAL COMPANY, LLC
CHEMICAL AND LUBRICATION OIL BULK FACILITY
SITE SPECIFIC INSTALLATION PERMIT APPLICATION 19001
SITE SPECIFIC INSTALLATION PERMIT 19-41-009
MONTGOMERY BOROUGH
LYCOMING COUNTY
COMMENT/RESPONSE DOCUMENT
SEPTEMBER 19, 2019

LIST OF COMMENTATORS

1.	Connie Hull	Citizen
2.	Adam Barilla	Citizen
3.	Joy Barilla	Citizen
4.	Jill Miller	Citizen
5.	Timothy Jutsum	Citizen
6.	Linda Stein	Citizen
7.	Paula Miller	Citizen
8.	Cynthia Bryan	Citizen
9.	Faith Barto	Citizen
10.	Becky Newhard	Citizen
11.	Deborah Foust	Citizen
12.	Rodney K. Gohl	Citizen
13.	Cheryl Wilt	Citizen
14.	David Morehart	Citizen
15.	Jerry S. Walls, FAICP	Citizen
16.	Michael Heyd	Citizen
17.	Samantha Jutsum	Citizen
18.	Daniel Bennett	Citizen
19.	Joan Hoover	Citizen
20.	Debbie Stine	Citizen
21.	George Basye	Citizen
22.	Laurel Green	Citizen
23.	Chris Spurr	Citizen
24.	Amber Seiders	Citizen
25.	Richard Miller	Citizen
26.	Eileen Klemick	Citizen
27.	Chelsea Bennett	Citizen
28.	Tina Tickle	Citizen

INTRODUCTION

This Comment and Response Document addresses public comment received for Storage Tank Site-Specific Installation Permit (SSIP) application 19001, for the installation of the aboveground storage tanks noted in the table below at Coastal Chemical Co., LLC, in Montgomery Borough, Lycoming County.

	Substance	Capacity
1	Base Oil and Additives (petroleum)	12,000 gallons
2	Base Oil and Additives (petroleum)	12,000 gallons
3	Base Oil and Additives (petroleum)	12,000 gallons
4	Base Oil and Additives (petroleum)	12,000 gallons
5	Base Oil and Additives (petroleum)	12,000 gallons
6	Ethylene Glycol	12,000 gallons
7	Methanol	12,000 gallons
8	Methanol	12,000 gallons

The thirty-day public comment period for this application commenced with the publication of the notice of application in the Pennsylvania Bulletin on May 11, 2019. This document addresses comments directly related to the SSIP application only.

COMMENTS AND RESPONSES

1. Comment: Multiple comments were received regarding the siting of the facility within a floodplain:
 - Not only is the proposed location in a known flood plain that often sees flooding, it is very close to homes and less than 2000 feet from the west branch of the Susquehanna River. (2)
 - It is my understanding that the proposed site is in the flood zone and should the area flood, that would not only contaminate Montgomery, but also everything down stream. (3)
 - The proposed site is in a known floodplain. While a spill response plan is required, there has been no publicly released information on the equipment and procedures that will mitigate damage during a flooding event. Also, there are ordinances in place that do not allow various types of chemicals to be stored in a floodplain. It is my opinion that these ordinances are being willfully ignored and/or attempts are being made to “get around them” by either stating that the tanks are initially dry or by masking the substances under trademarked tradenames or common references (such as “it’s just lubrication oil”). (4)
 - There are other nearby zoned industrial sites that are not in a

floodplain. The proposed site is not the only industrial site in Lycoming County. (4)

- Other initiatives undertaken by local business such as an expansion of Thad's Place (a local restaurant), the first proposed construction site of a Dollar General, and a mini-market have been previously denied because they were located in a floodplain. If small business cannot expand or create in a floodplain then it should not be any different for a large corporation. (4)
- This proposed facility is located in the floodplain, and an Industrial Waste Stormwater permit is required. (6)
- The highest flood mitigation standards must be applied and enforced for this project. (6)
- This facility will be located in a flood plain. (10)
- Site is in the 100yr flood plain, and the flood zones in our area have been changing recently to include more locations. Recent floods have been unpredictable in nature. (11)
- A huge concern for the location proposed lies within the flood zone. The area has been flooded many times in past history and a threat of that alone would propose a threat to all residents. (13)
- Since 1972 our Lycoming County Planning Commission has advocated, administered and enforced Floodplain Management Regulations. The County of Lycoming has over 2,500 miles of rivers and streams within our borders and we have experienced a flood in at least one of those stream corridors every 5.6 years. And some floods have been far more severe. So the proposed location of a chemical storage and transfer facility within the floodplain raises grave concerns. (15)
- Being in a flood zone, this site is not suitable for chemicals. In 2018, the Susquehanna River flooded the area to the level of the neighborhood of the site. If tanks are compromised during flooding, residential neighborhoods AND the river will be affected. (17)
- I would like to express my concern with Coastal Chemical and their desire to store materials in a flood plain that poses a health risk to residents in the community and the water supply. I have never been a proponent of building in a flood plain due to insurance costs, and the increased likelihood of a disaster that ultimately can cost lives and put a burden on tax payers. It is not fiscally responsible to allow anyone to build in a flood plain. There are many other locations Coastal can store the chemical that are not in a flood plain and can build the proper safeguards for a spill. (18)
- I am really surprised that DEP would even consider placing these

storage tanks in Montgomery and especially in a flood zone and residential area. That area was really flooded in 1972 and the street, Broad Street, next to the area has flooded. I think those residents are required to carry flood insurance. (19)

- Please do not allow Coastal Chemical to place a chemical facility in the middle of our small town. The site is also in the Susquehanna River flood plain. (20)
- I am opposed to the subject site for volatile chemical storage. It is in a “flood way” near a residential area. We had to move our wood, yard clippings, tree trimmings waste area from the flood way, yet it’s OK to store hazardous chemicals in this area. (21)
- Also that gets flooded. How you can put something like that in an area when you can’t build a house in a flood plain. (26)
- The location is in a low flood plain next to the Susquehanna River. We operate a Summer Food and activity program for children in Montgomery Park, the largest park in the county. This program takes place less than one mile downstream from the proposed chemical facility. A chemical leak from the facility in the midst of a natural disaster could contaminate the park and potentially leave Summer Alive homeless. Our town does not have the resources to prevent this kind of disaster. (28)

Response: The SSIP regulations in 25 Pa. Code § 245.234(a)(1) (relating to Siting requirements) state that the Department of Environmental Protection (DEP) will not issue an SSIP if “the installation of storage tank systems and facilities is proposed on 100-year floodplains or a larger area that the flood of record has inundated **‘unless an industrial use on the proposed site was in existence as of August 5, 1989.’**” (emphasis added). DEP’s understanding is that the site has historically been used for industrial purposes. The site is currently zoned for industrial purposes. Further, one historical map – the 1928 Sanborn Map, for example, shows the site occupied by the Montgomery Lounge Co., Inc., a furniture maker, at that time.

Since an industrial use previously existed onsite, DEP cannot deny this SSIP based upon the installation being located within the floodplain. While DEP’s statutory and regulatory authority in this instance are generally limited to the Storage Tanks Act and Chapter 245, Montgomery Borough may have its own separate authority or requirements related to the siting of a facility or any other additional protective measures due to its location within the floodplain.

2. Comment: Multiple comments were received regarding the increase in truck traffic through Montgomery, and the potential effect on the safety of individuals using the streets and sidewalks:

- The Montgomery Area School District is within one mile of the proposed site. According to its website, during the school year 2009-2010 it had 902 pupils, 77 teachers, 55 full and part time personnel, and 7 administrators. In the event of an emergency evacuation due to an event at the proposed site, that is over 1,000 individuals that would need to be moved. According to the 2014 census, the population of Montgomery was 1,571 individuals. Again, in the event of an emergency evacuation due to the proposed site, there are now at least 2,000 individuals within the borough limits that may need to be removed. There are a limited number of roads for ingress/egress to the town. (4)
- There is room for expansion of the tanks and operation of the hauling trucks. It has been stated by Coastal Chemical that only two additional jobs will be created. However, if the “natural gas boom” increases, then drilling activities will increase. This will mean an increased need for the products that Coastal Chemical supplies. With increased demand comes increased storage requirements, truck movement and more. Again, all in a known floodplain. (4)
- The site is under half a mile from a k-12 school. Any release will certainly effect the school. Truck traffic will also be driving through the same neighborhood as students live, walk, and play. Students also walk through the neighborhood of the proposed site on the way to school. (5)
- First of all it will be located in what is mostly a residential area. The site is also located close to the Montgomery Area School District and there are three Federal and one State Correctional Institutions in the area. Having retired from the Bureau of Prisons I know what a problem it would be to evacuate inmates if there would be the need. It is my understanding that truck traffic in the area would increase. Most of the streets in Montgomery are narrow and would cause problems. (8)
- The truck traffic to shuttle product in and out alone will come with serious consequences. When asked, Coastal representatives were unable to say what routes would be utilized. However, based on location, I’d say our (fairly) quiet street is a serious contender. (9)
- Which streets will be used coming into and from the facility? What state routes will be used? (10)
- The proposed facility is yards away from residential areas and a half mile from the Montgomery Area School District. Many of the children will walk past his facility to and from school. (10)
- School with 1000 students is 0.21 miles from the site. Public park, Little League fields, soccer fields, local library and downtown

business districts are all less than 0.39 of a mile from the site. Any routes to and from the site will involve narrow residential roads that are school bus routes and have children crossing that walk to school. Some routes will require trucks to cross railroad tracks in residential neighborhoods. (11)

- The borough streets that would be used to access these tanks are narrow and not designed for large tank trucks. Access to the major highways would require tanks trucks to use streets that are not designed for large trucks. (12)
- My main concern would be the transportation of these chemicals. The route into Montgomery is a very narrow roadway and difficult for bigger vehicles to maneuver, along with residents that live very close to the roadway. (13)
- Whose responsibility will it be to keep up the maintenance of the roads in the area? (14)
- Traffic congestion has increased in our area in recent years and the last thing we need is more trucks carrying dangerous chemicals on our roads and streets. (16)
- The site is under half a mile from a Pre-K thru 12 school. Truck traffic for this site will also be driving through the same neighborhood as students live, walk, and play. Students also walk through the neighborhood of the proposed site on the way to school. (17)
- Why would anyone want to have these tanks in town, or city? If these trucks would be coming in from Route 15 on Route 54, they will need to travel Main Street which is very narrow, plus 54 is a very busy road, and a lot of Amish buggies. The same for Route 405 leading into Muncy and 180. You're placing these tanks right in the middle of a residential area. (19)
- And we have plenty of children in this community that play everyday in town now we will have even more traffic! And our roads they aren't the greatest and now more traffic Who is gonna pay for that The Taxpayer? And look at Montgomery Street and Main Street them roads are very narrow you can barely get 2 cars through there let it along 1 tanker truck and a car possibly more accidents!!! (23)
- Children use this path where this company is trying to set up to walk from the elementary school to get home from school for the day. (24)
- This company will be making our roads worse than they already are. (24)
- We are a small community with residential areas on the upper side and across the tracks. We also have a school on the hill. We are concerned about the traffic which may be going down Broad Street

which is a residential area with families. (26)

Response: DEP appreciates these comments regarding truck traffic. Issues related to a potential increase in truck traffic, however, are beyond the scope of the SSIP siting regulations, especially those within 25 Pa. Code §§ 245.231-245.237 regarding the review and approval of SSIP permits. Issues such as traffic concerns, or whether to perform a traffic analysis, and other local zoning decisions may be directed toward the local municipality.

3. Comment: Multiple comments were received relating to the ability of local emergency responders to react to a potential incident at the Coastal Chemical facility:
- The fire department is not well enough equipped to handle any kind of issue there. (3)
 - It will be an undue burden for the local fire department to acquire the specialized equipment needed to control a large scale fire or chemical spill event at the facility. The local fire department only has one engine, one heavy rescue, and one ambulance. In the event of an emergency other volunteer fire stations need to be called to assist. It was previously reported by the Williamsport Sun Gazette that Coastal Chemical was willing to meet with the local fire department in a closed door session to discuss needs. Even so, it cannot be assumed that Coastal Chemical will donate any volunteer manpower or funds to local fire departments for the needed specialized equipment that will be needed to control an event at their facility. While it may be true that state grant money may be available to procure such equipment, the process is again burdensome and lengthy. (4)
 - We do not have a 24/7 police force in our town, and our fire department is entirely volunteer. It is fiercely unfair to expect these individuals to handle the substantial risks associated with this venture. It is unfair to ask the residents to accept these risks. (9)
 - What would happen if one of the methanol tanks were to catch on fire? What exactly IS the impact zone for 24,000 gallons of methanol? (9)
 - Emergency response if something should happen is: call corporate headquarters then, they will call CURA (the chemical people didn't know where the closest CURA is located.) The local response teams would be notified. This does not seem to be an efficient emergency response. (10)
 - Our emergency response teams are volunteers with limited funds and equipment. Will the burden of training and buying specialized equipment fall on the borough taxpayer? (10)

- We have a very small volunteer fire company, no matter how well trained it is still small and subject to people working, sleeping, or being out of town when needed. (11)
- We do not have police on duty 24 hours a day, we have part time officers. State police respond to 911 calls as they can, often can wait up to an hour. (11)
- We have been told that the local Fire Companies are not now equipped to contain and control fires and spills of such a chemical facility. I therefore request that DEP specifically REQUIRE Coastal Chemical to pay for and provide all the specialized equipment and specialized training for the community First Responders + Fire Companies + Lycoming County Department of Public Safety. (15)
- My concern is the public what would happen if there was a spill or fire? We as a small community does not have the equipment to fight that fire or contain that spill! From what I'm getting you need foam substance to fight a chemical fire. So who is gonna supply that foam or equipment for that, The Taxpayers? (23)
- I live less than a eighth of a mile from the site well within the explosion radius of the two highly flammable tanks. (25)

Response: Primary oversight of fire, explosion, and safety issues is handled by the Pennsylvania Department of Labor & Industry (L & I), through its Flammable and Combustible Liquids program and associated installation permitting process. Of the proposed regulated substances to be stored in storage tanks at this facility, only methanol is a flammable or combustible liquid. While issues related to fire and explosion concerns are beyond the scope of DEP regulations related to the SSIP process, please note that 25 Pa. Code § 245.612 of the storage tank program regulations (relating to performance and design standards) require any tank systems storing flammable or combustible liquids to be designed, constructed, and installed in accordance with an appropriate current code of practice such as National Fire Protection Association (NFPA) 30 (Flammable and Combustible Liquids Code). In addition, every aboveground storage tank storing flammable or combustible liquids is required by L & I to have some form of construction or device that will relieve excessive internal pressure caused by exposure fires. *See* 34 Pa. Code § 14a.8(b) (relating to Emergency relief venting for fire exposure). If tank pressure escalates, the emergency vent will open to relieve pressure on the tank, thereby minimizing the risk of explosion.

A detailed Spill Prevention and Response Plan (SPRP) is a requirement under Chapter 9 of the Storage Tank Act (Tank Act). Further, all owners and operators of storage tank systems must comply with the corrective action and notification requirements under Chapter 245, Subchapter D, which, for certain facilities that exceed 21,000 gallons in storage capacity, includes

immediate notification of a release to the county emergency management agency, the Pennsylvania Emergency Management Agency, and DEP; and appropriate response to the release. In addition, certain downstream water users must also be notified in the event of a release.

4. Comment: Multiple comments were received regarding the benefits that Coastal Chemical brings to the Borough of Montgomery, as well as the concern that Coastal Chemical's facility will depress local residential property values:

- The potential risks outweigh the benefit of locating the chemical storage tanks in Montgomery. (2)
- The value of their homes is going to drastically depreciate. (1)
- While I am not opposed to business in Montgomery or in that particular site, I do believe that it is a poor choice for this site. I feel the risks of potential leaks far outweigh any benefits to our town. (3)
- I do not believe there is any benefit to the area to have that many VOCs so close to my home and the school. (3)
- This site brings no benefit to the residents of Montgomery, only to a company with no local interest. They admit that their only reasoning for picking the site over others was the inexpensive cost of rent. (5)
- I believe this will negatively affect property values. (3)
- My home is .09 of a mile away, we have lived here for 30 yrs, have done many improvements and now our property value will definitely be lowered as well as the likelihood of someone wanting to buy our property. Many people will be in the same situation. (11)
- There is no real benefit for the borough to have these tanks since there will be little or no property tax income. Little opportunity for employment since the company will have a supervisor and a small number of drivers. (12)
- The borough of Montgomery has long been an eyesore due to industries moving or closing down. Empty buildings populate this area, some that are not maintained well. In the past couple of years a community development committee has formed with the goal to clean up the town and pull in small businesses to boost local growth to the town and improve the image of the town. Putting in yet another "dead" facility with the hopes of filling only two jobs will continue to add to Montgomery's poor image and do nothing to improve the town or its image. (13)
- It has the possibility to scare away potential new businesses to come to the area, in the future. (14)

- If there were significant benefit to Montgomery from this installation, I might be more favorably disposed, but as I understand it, there is little beyond creating a couple of jobs. There really is no justification for allowing this project to put our area in unnecessary jeopardy. I have no reason to expect that this out-of-state company that seems to have tried to quietly slip into our community will be a good neighbor. (16)
- This site brings no benefit to the residents of Montgomery, only to a company with no local interest. No jobs or revenue will be brought to Montgomery. Coastal Chemical admits that their only reasoning for picking the site over others was the inexpensive cost of rent. (17)
- I disagree with them moving in here and to what extent is the community benefitting from this? 2 jobs and they are already taken!! Plus the fear of the community that everyday we have to worry about spills or a catastrophe!! I Myself, I have lived here for 15+ years and have never had to fear that something like this would happen granted there is “accidents”. The oil company itself will be the only people that benefit from this not the community the only thing we will have is fear everyday that nothing happens! (23)
- We are a very very low income community and this company is not bringing any value whatsoever to our community to set shop up here. (24)
- They are employing one person locally who will be the driver of a tanker. (24)
- There is no community benefit to the proposed storage no tax revenue decreased property values. (25)
- The value of our homes will go down and who would want to live in a town with dangerous chemicals. How many other towns have chemical tanks in the middle of their town? Why can't they put them out in the country where no one lives. Please let us keep our little town without the dangers of the tanks and the turmoil it will make. (26)

Response: Comments related to economics and aesthetic values are beyond the scope of DEP's regulations related to SSIP requirements. These are issues that may be addressed by a local municipal authority. The applicant has provided a copy of the issued zoning permit for the proposed facility.

5. Comment: Multiple comments were received concerning potential air emissions at the facility:

- I object to Coastal Chemical being exempt from the DEP air

emissions standards. VOCs are not good for our physical health. (6)

- I have serious health issues with severe asthma and am on a nebulizer multiple times a day! What do you think this meth factory will do to me! And then my husband has lung issues from working at a factory and has been forced to change positions at work due to lung sensitivity. What do you think will accidentally become of his health? Does anyone care about not only my children but the 1000s of children in the area that this might cause unknown health issues? Bottom line this can't be just about being the cheapest location to do this to so many people!!! Children will get sick and then who is going to be held accountable for issues here??? (7)
- Why will the facility be exempt from air emissions? Doesn't oil and these other chemicals have an odor or are we supposed to breath in acceptable levels...tell that to someone with lung and breathing problems. (10)
- Air quality concerns from operational fumes and accidental releases need to be addressed. (15)
- There will be trucks going all day long and I can't believe we will not have fumes from the trucks loading and unloading at the tanks. (26)

Response: Pursuant to 25 Pa. Code § 127.14, DEP's Air Quality Program has determined that the proposed facility qualifies for an exemption from review under a plan approval application and from the requirements of an operating permit for the air contaminant sources at the proposed facility. In determining an exemption, DEP's Air Quality Program evaluates the types of storage tanks at the facility due to their potential to emit air contaminants, and whether they are exempt from review under the submission of a plan approval application. Second, the facility is then reviewed with respect to its overall potential emissions and estimated actual emissions as to whether it can be determined to be exempt from operating under the requirements of an Air Quality operating permit. These exemptions notwithstanding, the facility and sources remain subject at all times to all otherwise applicable air quality regulations specified in 25 Pa. Code Chapters 121-145. Among these regulations are restrictions regarding malodors and fugitive particulate matter. In particular, the proposed methanol storage tanks are subject to the storage tank requirements of 25 Pa. Code §§ 129.56 and 129.57. Further, per the stipulations found in the Department's Plan Approval and Operating Permit Exemption document (275-2101-003), if DEP determines that any exempted source is causing air pollution in violation of Section 8 of the Air Pollution Control Act, 35 P. S. § 4008, or 25 Pa. Code § 121.7, DEP may order the installation of additional air cleaning devices. In those cases, plan approvals and operating permits may be required.

6. Comment: Multiple commentators expressed frustration at the response provided by

Coastal Chemical during the June 4, 2019 public meeting:

- I attended the public meeting that was held to provide information to the residents of Montgomery. The representatives of Coastal Chemical couldn't or wouldn't answer a large majority of the questions that were posed to them. We heard a lot of "we don't have that information" and "we don't have those statistics." The only real fact they shared with us is that this location would be the cheapest place for them to place this facility. (8)
- I feel that a toxic waste facility would best be located away from homes and schools. I am also concerned about the security of the facility. We were told at the meeting there would only be two employees. The monitoring of the facility would be done remotely. When asked, they could not provide an answer as to what the response time would be if something occurred that needed attention. This is unacceptable. I got the feeling that this company is not properly prepared for locating a toxic waste facility in this area. Their responses to the legitimate questions that were asked were evasive and uninformative. (8)
- The public meeting only exacerbated the concerns of Montgomery residents, myself included. Representatives from Coastal Chemical were unable to sufficiently answer any questions of value. However, they were sure to mention (several times) that Montgomery was the cheapest location, and how it helped THEIR bottom line. With all due respect, I could care less about their bottom line. To me, it is unconscionable to store that quantity of chemicals in the center of town. (9)
- After the public meeting with Coastal Chemicals on Tuesday, June 4, many questions and concerns remain unanswered. (10)
- I was at the Tuesday 6/4/19 public meeting with Coastal Chemicals. I was under the impression that this meeting was happening so they could answer the communities questions. They did not even know the names of the streets trucks would be using to get to and leave their plant or how many trucks would be driving through our neighborhoods. Very few questions were answered at all. The one question they were very clear on was why they chose the middle of a residential area for this storage site of dangerous and hazardous chemicals and that answer was because it was the cheapest location. (11)
- Coastal chemical representatives failed to answer a dozen questions asked to them by the public at the public meeting. Why? (24)

Response: Some of the questions posed to Coastal Chemical Co., LLC are beyond the scope of DEP's regulations regarding SSIP permits. DEP has determined

that Coastal Chemical Co., LLC provided the necessary information and responded to DEP questions relative to its SSIP application in accordance with 25 Pa. Code §§ 245.231-245.237.

7. Comment: Multiple commentators were concerned about the potential impacts to the Susquehanna River should a release occur at the Coastal Chemical Co., LLC facility:
- A spill or leak would not only contaminate local residential properties, but could travel downstream and harm a much larger area. (2)
 - This site is within .25 miles of the Susquehanna River. Any spill is highly likely to have downstream consequences. In 2018, the Susquehanna River flooded the area to the level of the neighborhood of the site. (5)
 - Any leakage from the facility, whether from accidental or natural causes, likely would contaminate the site, the nearby community, and the Susquehanna River, to which the site is uncomfortably close. (16)
 - This site is within .25 miles of the Susquehanna River. Any spill is likely to have downstream consequences. (17)

Response: DEP's aboveground storage tank regulations, beyond those found within the sections pertaining to SSIP permit requirement, generally require owners and operators of storage tanks to comply with many installation, performance, and oversight requirements that aid in spill prevention. The issuance of a SSIP is only one component of DEP's oversight of regulated aboveground storage tanks. Other components, intended to prevent a release of product from the storage tank systems, include the use of DEP-certified individuals to install, modify and remove tanks; proper design and installation of tanks in accordance with relevant industry standards and manufacturer's specifications; requirements for routine operation and maintenance of the tanks; inspections of the facility conducted by independent third-party DEP-certified inspectors as well as DEP staff; development and implementation of a detailed Spill Prevention and Response Plan; installation and maintenance of acceptable secondary and emergency containment structures, spill and overflow prevention and security measures; requirements for corrosion prevention and proper labeling; requirements for proper closure of regulated tanks; and requirements for rapid reporting of and response to releases, including strict corrective action measures when necessary.

In addition to the above-referenced general regulatory requirements, a detailed SPRP is a requirement under Chapter 9 of the Tank Act. 35 P.S. §§ 6021.901-6021.904 (relating to Spill Prevention Response Plan). Further, Chapter 245, Subchapter D, requires rapid notification of a release to the

county emergency management agency, the Pennsylvania Emergency Management Agency, and DEP; and appropriate response to the release. In addition, downstream water companies, downstream municipalities and downstream industrial users within 20 miles of an aboveground storage tank facility that is located adjacent to surface waters shall be notified on a priority basis based on the proximity of the release by the owner within 2 hours of a release which enters a water supply or which threatens the water supply of downstream users. 25 Pa. Code § 245.305(g) (relating to Reporting releases). Subchapter D addresses the corrective action process for owners and operators of storage tanks and storage tank facilities and other responsible parties.

8. Comment: Multiple comments were received related to potential general safety concerns with the placement of a bulk chemical facility in the Borough of Montgomery:

- My first concern is their [family] safety and the safety of the town. Why would they want to build right in the middle of town that may be putting people's lives and/or health in jeopardy. (1)
- I don't understand why they would want to put chemical tanks in the middle of a small community when I see acres of land for sale in the surrounding farm lands. (1)
- I feel it is very irresponsible to have so many potential contaminants so close to homes, schools and river. (3)
- This site is next door to occupied residences. Use of this site for petrochemical storage and transport through this neighborhood will be detrimental to the health of residents. (5)
- What if there is an accident or a spill and the ethylene get into the ground? Would it effect our water? (9)
- The last and most major concern is the chemicals. The volume itself is a worry, even though we are being led to believe that the chemicals would not propose any hazards. If all that is true, questions arise on why DEP is involved and a public forum is needed? In my opinion, if no threat exists, then DEP would not be involved. (13)
- I believe that this facility would constitute an unreasonable risk to the people of Montgomery and the surrounding area. The natural gas fracking industry has already compromised the environment, infrastructure and quality of life in this part of Pennsylvania. The potential for more damage from the proposed facility is too great. (16)
- We have recently seen devastating chemical fires at facilities in Houston and elsewhere. We have experienced numerous severe weather events in this area and there is no reason not to expect more

of them. A tornado or similar wind event striking the proposed facility would be devastating. (16)

- This site is next door to occupied residences. Use of this site for petrochemical storage and transport through this neighborhood will be detrimental to the health and quality of life of residents. (17)
- Other chemical providers for the gas shale have located away from populated areas. Coastal officials stated that “safety came before profits” yet they chose a populated area because “it was affordable”. Please advise Coastal to find an alternate site out of the flood way and away from residential areas. (21)
- I feel this is an assault on a low income community. The only thing they have to offer our borough is risk at this point. This company had little to no answers for us at our public meeting. The Health and safety of our borough is important and this company insisting over and over that these chemicals are harmless is proof in itself (especially after reading the Safety Data Sheets) that they have no desire to be honest about this business. So how honest will they really be about your safety requirements? (22)
- Why we would want these chemicals storage in such close proximity to our children in this community? (24)
- They have no security guard on site 24/7 so there is no security for the community. (24)
- I don't feel these chemicals are safe this close to residential properties. Why can't they be stored in an open field miles from anyone. (24)
- The superintendent of the school is very uncomfortable with this chemical storage facility being a quarter of a mile from 1000 students. (24)
- I know there are a lot of safety procedures as far as the Coastal Chemical build are concerned by my neighbors and I are worried if there would be an incident that got out of control how it would effect the house that totally surround it. (25)
- I'm concerned about the proposed chemical storage in Montgomery. Number one reason and had to be moved to a different job at work because of 22 years of exposure I'm alarmed at the proposed amounts. The anodize line I ran was the second biggest on the East Coast and all the tanks combined didn't hold the volume of one of these tanks. (25)
- I am writing concerning the placement of chemical storage tanks in Montgomery. In this age of environmental awareness, it seems counterproductive to purposely place large amounts of chemicals in a

flood plain. Please consider the health and safety, not only of our community, but all those affected by our waterways. (27)

Response: 25 Pa. Code § 245.231(a)(2) requires Coastal Chemical Co., LLC to receive an approved SSIP prior to the installation of their proposed new large aboveground storage tank facility. Prior to operation of the storage tanks, approved operating permits are required per § 245.203 to ensure the storage tanks are maintained and operated in compliance with the standards and requirements of Chapter 245 and the Tank Act. The performance, monitoring, and corrective action requirements under Chapter 245 mitigate the risk of the storage of these substances (see the response to Comment 7 above). DEP's review of a SSIP and subsequent operating permits is based on whether the applicant has met the relevant requirements under sections 245.231 through 245.237. As discussed above, the Tank Act and Chapter 245 regulations are designed to protect public health and the environment.

9. Comment: The following commentators felt there should have been additional time for the public to provide input into the permit decision:

- A public meeting should have been held long before we reached the final point in time where there was little time for public input. From what I observed, most of the citizens do NOT want these storage tanks within the borough. (12)
- I think it would be prudent to deny any application at this time to give the citizens ample time to review the proposal and to allow more public input before a final decision is made. (12)
- Our community was completely unaware of all this taking place. It was all done behind our backs from the get go. (24)

Response: SSIP applicants are required by 25 Pa. Code § 245.236 to provide public notice to the county and municipality in which the proposed storage tank systems will be installed prior to submitting a permit application. Coastal Chemical Co., LLC met this requirement by sending letters dated March 25, 2019 to the Lycoming County and Montgomery Borough Emergency Management coordinators. These letters informed the county and borough of the proposed installation of storage tank systems and submittal of an SSIP application to DEP. In addition, Coastal Chemical Co., LLC attended a public meeting on June 4, 2019 at the Montgomery Area High School. The Muncy Luminary and Williamsport Sun-Gazette published stories that covered the proposed project in April, May, and June 2019. Finally, the SSIP application has been available for public review in the Williamsport and Harrisburg (Central) offices since April 26, 2019.

10. Comment: Why isn't triethylene glycol a regulated substance? (10)

Response: Section 103 of the Storage Tanks Act, 35 P.S. § 6026.103, and 25 Pa. Code §

245.1 (relating to definitions) define a “regulated substance” as:

An element, compound, mixture, solution or substance that, when released into the environment, may present substantial danger to the public health, welfare or the environment which is one of the following:

(i) A substance defined as a hazardous substance in section 101(14) of CERCLA, including hazardous substances that are liquid or gaseous, or suspended therein regardless of holding temperature, but not including a substance regulated as a hazardous waste under Subtitle C of the Resource Conservation and Recovery Act of 1976 (42 U.S.C.A. § § 6921—6931).

(ii) Petroleum, including crude oil or a fraction thereof and petroleum hydrocarbons which are liquid at standard conditions of temperature and pressure (60° F and 14.7 pounds per square inch absolute), including oil, petroleum, petroleum mixed with ethanol, fuel oil, oil sludge, oil refuse, oil mixed with other nonhazardous wastes and crude oils, gasoline and kerosene.

(iii) Other substances determined by the Department by regulation whose containment, storage, use or dispensing may present a hazard to the public health and safety or the environment, but not including gaseous substances used exclusively for the administration of medical care. This includes the following other regulated substances:

(A) Nonpetroleum oils including biodiesel; synthetic fuels and oils, such as silicone fluids; tung oils and wood-derivative oils, such as resin/rosin oils; and inedible seed oils from plants, which are liquid at standard conditions of temperature and pressure. The requirements in this chapter for petroleum tanks in subparagraph (ii) apply for this group of substances.

(B) Pure ethanol intended for blending with motor fuel. The requirements in this chapter for petroleum tanks in subparagraph (ii) apply.

Triethylene glycol would not fall under the category of “regulated substance” since it is not defined as a “hazardous substance” under CERCLA, and it is neither a petroleum product nor specifically regulated by DEP by regulation.

11. Comment: Who owns and is leasing this property to Coastal Chemical? (10)

Response: Property records can be found by contacting the Lycoming County Recorder of Deeds.

12. Comment: Who is responsible for clean-up of spills and removal of tanks when this company leaves the area? (10)

Response: The storage tank owner is ultimately responsible for any cleanup of spills and maintenance or removal of storage tank systems. Should the company leave this site, ownership of the tanks will be transferred per the terms of the lease agreement, if Coastal Chemical Co., LLC does not remove them. Any contamination becomes part of the property and will be the responsibility of the property owner to address.

13. Comment: Huge mega watt lights shining in our yards and homes. (11)
Response: This comment is outside the scope of the SSIP review.
14. Comment: I also wonder what and why Montgomery was chosen for this site. There are many communities that have easier access and the same amount of empty buildings that could house these tanks. (13)
Response: This comment is outside the scope of the SSIP review.
15. Comment: It is my understanding that the person that wrote out the permit was not authorized to do so. (14)
Response: The applicant provided a copy of the approved zoning permit for the proposed facility.
16. Comment: It is my understanding that the property was planned to be a Brownsfields area by Lycoming County and Montgomery Borough, which is not to have permanent buildings or water and sewer hook-up on the area. I know there are buildings already located there but should not have been built. It should have been a recreational area years ago. (14)
Response: This comment is outside the scope of the SSIP review. Land use, zoning, and other related issues may be addressed at the municipal level.
17. Comment: How is the property owner benefiting from this deal? (14)
Response: This comment is outside the scope of the SSIP review.
18. Comment: While the storage tanks will be enclosed by a containment structure(s) the specific design and protective features need to be capable of sealing any inadvertent leaks due to pipe failures or leaky hose couplings. (15)
Backup designs to address human error while loading/unloading operations may incur spillage are important. (15)
Even small spills which can be tracked by truck tires from the facility onto Borough streets pose a safety and health hazard. The facility is located on a street which is a main corridor for kids that walk to the 3 schools nearby. If spills are tracked onto the streets by trucks kids can pick up those chemicals on their shoes and track them into their homes and onto the carpets and then the air and their pets can be exposed. (15)
Response: The issuance of a SSIP is only one component of DEP's oversight of regulated aboveground storage tanks. Other components include the use of DEP-certified individuals to install, modify and remove tanks; proper design and installation of tanks in accordance with relevant industry standards and manufacturer's specifications; requirements for routine operation and maintenance of the tanks; inspections of the facility conducted by independent third-party DEP-certified inspectors as well as DEP staff; development and implementation of a detailed SPRP; installation and

maintenance of acceptable secondary and emergency containment structures, spill and overflow prevention and security measures; requirements for corrosion prevention and proper labeling; requirements for proper closure of regulated tanks and requirements for immediate reporting of and response to releases, including strict corrective action measures when necessary. Small spills are addressed in section 3.1 of the facility SPRP. Spills should not be tracked out of the facility.

19. Comment: When I served on the PA DEP State Water Plan Advisory Committee I was shocked to learn that PA is one of only 5 states which still DO NOT have private water-well construction and sealing standards. Therefore, and given that this facility is proposed to be located in a floodplain, it is CRUCIAL the DEP require Coastal Chemical to pay for sealing and grouting of down-gradient private and public water wells. (15)
- Response: This issue is beyond the scope of the Chapter 245 SSIP requirements.
20. Comment: The Coastal Chemical Facility in Montgomery Pa does not have a valid permit. The gentleman who issued their permit in December did not have the authority to issue industrial permits. (20)
- Response: This issue is outside the scope of the SSIP review. Coastal Chemical Co., LLC provided a copy of the issued zoning and construction permits.
21. Comment: Please say no to allowing this chemical facility to be placed close to our homes, school and also federal and state prisons. (20)
- Response: DEP's decision on whether to issue a SSIP and subsequent operating permits is based on whether the applicant has met the requirements of the Tank Act and the Storage Tank Program regulations. The Tank Act and 25 Pa. Code, Chapter 245 have been designed to protect public health and the environment.
22. Comment: Will the tanks be inside a building or outside? Who will monitor the number of tanks or what is stored in the tanks. (21)
- Response: The plot plan submitted with the SSIP application indicates that tanks will be located both inside and outside of the building. Coastal Chemical Co., LLC must follow all pertinent storage tank regulations regarding the use of DEP-certified tank installers and notification of any product changes or tank installations to DEP.
23. Comment: At a recent public meeting with Coastal Chemical, they stated they will not be blending chemicals at this facility, but their application lists on their Authorization Application: Blending & Distribution of process chemicals and lubrications. (22)
- Response: Coastal Chemical Co., LLC confirmed that there are no immediate plans for blending at this facility. Blending operations that may occur in the future would be the dilution of coolant with deionized water.

24. Comment: Their containment in the building can only hold just over 10,000 gallons – that’s not even enough to contain one of the six tank volume. (22)
- Response: Coastal Chemical Co., LLC is planning to install double-walled storage tanks, which do not require additional containment if they meet additional requirements in 25 Pa. Code § 245.612(d), which include spill prevention, overfill prevention, and anti-siphoning valving.
25. Comment: There is no contact names or numbers on their Spill Response Plan. (22)
- Response: Certain details within a SPRP, such as specific contact names and phone numbers, may not be available until the storage tanks are installed and the facility is readied for operation. As these details are typically determined immediately prior to facility operation, DEP will continue to review the SSIP independently of the SPRP. However, DEP will require the submittal of these details prior to issuing operating permits for the storage tanks. Operating permits must be issued prior to the delivery of product to the storage tanks.
26. Comment: On the engineers certification the company is listed as Coastal Comical. (22)
- Response: This appears to be a typographical error. The Engineer’s Certification is a required element of the federal Spill Prevention Control and Countermeasure (SPCC) plan but is not an element of a SPRP required under the Storage Tank Program regulations.
27. Comment: See Section 1.1 Applicability of Substantial Harm Criteria (attached). (22)
- Response: This section is not a required part of the SPRP, but rather the federal SPCC. The question relates to whether product is transferred over water, such as off a barge or ship. The Coastal Chemical Co., LLC facility does not transfer product over water.