

Talking Points for the Maryland Department of the Environment Air Quality Permit

Write a detailed, individualized written comment letter to Shannon Heafey before June 12th. Make sure to *use your own words* and to focus on only one or two of these points.

The most important issue to stress is that we need a HEALTH IMPACT ASSESSMENT.

Mail your letter, or send via email to:

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The Maryland Department of the Environment (MDE) should not be rushing to approve this application. Only four days after MDE received Dominion's most recent supplemental information, they released their "tentative determination" of approval. MDE should have taken more time to consider the material and deferred to the decision made by the local zoning authority: the Charles County Board of Appeals. For MDE to give a tentative determination so quickly after highly questionable and technical supplemental data was submitted by Dominion is a red flag.

Dominion's proposed compressor station would emit many harmful air pollutants, including nitrogen oxides, carbon monoxide, volatile organic compounds, particulate matter, and formaldehyde (which is considered a hazardous air pollutant by the Environmental Protection Agency (EPA)). These air pollutants are associated with health impacts ranging from respiratory illnesses to cardiovascular effects, birth defects, cancer, etc.

Air pollution from compressor stations includes "spikes" of pollution during "blowdowns" when the station is depressurized and air pollutants are literally shot out of the station at great speeds and in great quantities. Dominion estimates that these "events," which include plant startups and shutdowns, would be scheduled on about one third of the days of each year; plus unplanned emergency blowdowns would occur. In combination, all these "events" would expose people to extremely high spikes of pollution that could cause acute negative health effects.

The air permit application and draft permit do not include the blowdown emissions in the estimated one-hour nitrogen oxide emissions, so there is no way to measure whether Dominion will be in compliance with federal air limits during blowdowns, which will be frequent.

The air pollution in our community would be worse than for many other communities near compressor stations because the proposed compressor station is a particularly large one -- larger than all compressor stations in New York, for example. Plus, this station would be located in a geographic depression where pollution collects. Finally, the planned smoke stack height was lowered from 83 feet to 50 feet, which will further increase the amount of air pollution lower to the ground.

Dominion's lowered, proposed stack height of 50 feet is just 4.6 feet higher than the proposed compressor building. When smoke stacks are not sufficiently taller than the buildings that surround them, air pollutants tend to get trapped in recirculating paths downwind of the buildings, in a phenomenon called "downwash." Downwash leads to greater pollution levels near the ground level, downwind of the smoke stacks. In order to prevent downwash, EPA created rules to regulate stack height. The EPA formula is that the stacks should be 2.5 times the building height - something called the "good engineering practice" stack height. According to this formula, Dominion's good engineering practice stack height should be 113.5 feet. Dominion's stack height is 63.5 feet lower than the recommended height, which means the downwash increase in ground level pollution will be severe. Also, Dominion has not released its electronic air modeling files for this project, so the downwash effects on the air modeling and anticipated emissions on this site are currently unknown.

The air application and draft permit do not include estimates for unregulated “fugitive emissions.” These are leaks from connectors that are common at LNG facilities. They are often substantial, but may go unnoticed if the gas isn't odorized (which it is not planned to be here). Dominion is allowed thirty days to fix leaks, so citizens could routinely be exposed to emissions that exceed federal air limits for as long as a month due to leaks. In the Cove Point case, Dominion argued that they could not monitor fugitive emissions and also that they should not be required to monitor fugitive emissions.

MDE is not considering the worst-case scenario for the ambient air, which is especially problematic given how close to the legal limit some air pollutants are reported to be. Regional/multi-source modeling should have been done instead of using background averages based on ambient air monitoring data from across the river in Arlington, Virginia, more than 13 miles from the proposed compressor station site.

Estimates show that the proposed compressor station could emit an illegally high amount of nitrogen dioxide (NO₂). 188 is the one-hour NO₂ limit. In their original application, Dominion reported their predicted NO₂ emissions would be 177. In the recently submitted supplemental information, the number changed to 129. Why are Dominion's numbers so different since the project has not changed? In MDE's tentative approval of the project, the estimated number is 181.5. Modeling uncertainty is +/- 30%.

MDE should provide an opportunity for the cross-examination of witnesses. Dominion has submitted two contradictory air-modeling statements. Citizens need an opportunity to cross-examine Dominion's expert witnesses. This is the best way to learn the truth about the inconsistencies in their application.

The EPA has required that the NO₂ levels not be exceeded for purposes of public health. The health of people with existing health problems (such as asthma and respiratory illnesses), would be threatened by NO₂ levels that exceed the federal standards. Some studies already question the sufficiency of current standards.

MDE needs to conduct a “health impact assessment” to determine potential and predicted health impacts for the local population.

At the current time, the region is already not in compliance with the federal ozone standards. The proposed compressor station would further exacerbate air pollution and related health problems.

The proposed project would result in approximately 5.9 million metric tons of CO₂e emissions per year from end-use combustion. This is equivalent to the annual emissions of over 1.2 million cars and is greater than the annual emissions of a major coal-fired power plant.

Emissions per year of just four kinds of air pollutants would equal that emitted by 887 idling tractor trailers, 41 tractor trailers worth of nitrogen oxide (NO_x), 53 tractor-trailers worth of volatile organic compounds (VOCs), 132 tractor-trailers worth of carbon monoxide (CO), and 661 tractor-trailers worth of ambient particulate air pollution (PM_{2.5}).

Cumulative impacts of multiple pollutants can be severe, but are being ignored. Potential health impacts are being considered on a one-by-one pollutant basis without consideration of their accumulated impacts. Dominion and MDE have failed to assess the additive impacts of exposure to multiple pollutants (e.g., PM_{2.5}, ozone, NO₂), an especially important concern for already health sensitive individuals including the very young, the elderly, pregnant women, and those with pre-existing conditions. The standards also do not consider the potential synergistic effects of different pollutants.