



May 1, 2017

Thomas Cushing, Permit Chief
Massachusetts Department of Environmental Protection, Southeast Regional Office
20 Riverside Drive
Lakeville, MA 02347

Dear Mr. Cushing,

The Sierra Club Massachusetts strongly opposes the issuance by the Massachusetts Department of Environmental Protection (DEP) of the Proposed Air Quality Plan Approval for the Non-Major Comprehensive Plan Application submitted by Algonquin Gas Transmission, LLC, and Enbridge Inc., for the proposed Fore River Compressor Station on the Atlantic Bridge Project.

The Sierra Club is the oldest and largest grassroots non-profit environmental organization in the country, with over 2.7 million members and supporters nationwide. Our Massachusetts chapter has over 75,000 members and supporters. We work to create healthy, vibrant communities through support of clean air and water; clean energy; recycling and waste-elimination; and the preservation of the Commonwealth's most treasured forests, parks and open spaces.

The application fails to identify some sources of pollution, including, but not limited to, that from commercial and recreational ships coming into the Fore River; the venting of the sewer pump station; emissions from deliverables to Clean Harbors from many truck deliveries; transfers of products to multiple tanks; off-loading of products from ships; gaseous vapors from fossil fuel storage tanks; emissions from the MBTA Greenbush line commuter rail diesel locomotives and the Fore River Transportation freight locomotives.

Multiple sources of emissions were not measured or monitored because regulations exempt them from tracking and control. These fugitive emissions from the release of gas and vapors from pressurized tanks and

unintended leaks add up to a significant source of pollution impacting the Fore River basin. Not acknowledging their presence is misleading.

The Harrison Avenue site location in Boston used as the air monitoring site for the proposed permit is near a tightly packed small business and residential community. The medical center near Harrison Avenue has its own power plant; the Fore River Basin has two power plants that serve the region. The Fore River Basin also is impacted by a coastal zone inversion, where emissions are trapped close to the ground.

There are petroleum trucks frequently loading from the multiple oil and gasoline tanks, releasing vapors. The Massachusetts Water Resources Authority sludge plant bakes dewatered sewage sludge, generating odors and compounds in the vicinity. Twin Rivers Technologies, one of the largest oleochemical producers in North America, processes fatty acids into a component of biofuel, storing the product in tanks before transferring it via rail tank cars off site. It also receives deliveries of oil materials, including palm oil, for processing by ship and truck. The Calpine Power Plant stores oil as a backup fuel; gas is released from the tank through vents. Exhaust pollution is emitted from the 37,000 vehicles that travel over the bridge every day. Off-loading of road salt by ship at Cashman's property, as well as other activities by Quirk, generate emissions not measured by permits.

We have concerns about existing levels of pollution in the Fore River Basin. Benzene levels already exceed the DEP's Ambient Air Limits (AALs) in the greater Boston area. The Citgo oil tank farm in Braintree releases a significant amount of benzene and is located within one mile of the proposed site. According to data from the EPA's Toxics Release Inventory, Citgo released 5,665 pounds of benzene into the air in 2015. The most recent EPA National Air Toxics Analysis (NATA) demonstrates that local benzene levels are high enough to increase local cancer risks.

Further testing is needed within the Fore River Basin. DEP should request the applicant to provide dispersion modeling of hazardous air pollutants (HAPs) — HAPs that incorporate ambient and local source data, including but not limited to the ambient benzene levels near Citgo terminal in East Braintree and Sprague Terminals in Quincy.

DEP should conduct independent testing for formaldehyde in and around the proposed facility location, if they do not already collect these data.

Data on hazardous and radioactive pollutants need to be addressed. Neither the permit nor the application address the presence of radon, heavy metals, and radioactive lead in fracked gas and fracked gas infrastructure. DEP should require the applicant to provide test results for these hazardous pollutants, including an analysis of the impacts of these releases.

According to a 2005 report by the New England Environmental Justice Research Network at Northeastern University, low income communities in Massachusetts “face a cumulative exposure rate to environmentally hazardous facilities and sites which is four times greater than high income communities. In addition, high minority communities face a cumulative exposure rate to environmentally hazardous facilities and sites which is over twenty times greater than low minority communities... Environmentally hazardous sites and facilities of all kinds are disproportionately located in working class towns and communities of color.” In recent Federal Energy Regulatory Commission (FERC) filings, it is imperative to note that Enbridge is using the totality of Norfolk county to discredit the protection to which Quincy Point and Germantown, as Environmental Justice (EJ) communities, are entitled. Both of these neighborhoods are located within the one-half mile notification radius of the proposed compressor. Both have Federal and State EJ status. Using the entire county for modeling is inherently faulty.

EJ issues can only be achieved when all concerned have equal access to the decision-making process and everyone enjoys equal protection from environmental harm. These constituencies carry a disproportionate share of exposure to harmful and toxic power plant emissions, including lead, mercury, arsenic, soot and smog. Polluted air, water and soil can lead to adverse health conditions that can linger in communities for decades.

The DEP has a legal responsibility under the Global Warming Solutions Act of 2008 to investigate and protect residents of the Commonwealth from projects that would contribute to the release of greenhouse gases that contribute to climate change. Section 7 of the act orders that, “[i]n considering and issuing permits, licenses, or authority shall also consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions.” In the report by Algonquin, Enbridge Inc., at least 41 tons of greenhouse gases will be emitted from the compressor station every year, not to mention inevitable, dangerous leaks and failures in proposed new pipeline infrastructure. A prime example is the rupture on Algonquin/Enbridge’s pipeline in Providence, RI, on March 29, 2017, and the frozen relief valve on the Enbridge Gas Metering Station on January 6, 2017.

According to the Pipeline and Hazardous Materials Safety Administration, nationwide, there were 37 ‘serious’ and 305 ‘significant’ pipeline incidents in 2016. This year, there have already been seven serious pipeline incidents and 44 significant pipeline incidents.

The Massachusetts Supreme Judicial Court in 2016 clearly indicated the Commonwealth’s legal commitment to the Global Warming Solutions Act. That Act alone prohibits DEP from approving the Proposed Plan to Algonquin/ Enbridge Inc.

Sincerely,

Emily Norton
Chapter Director

Cathy Ann Buckley
Chapter Chair

Robert Kearns
Chapter Executive Committee

Massachusetts Sierra Club

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CC:

Governor Charlie Baker

Secretary Matthew Beaton

Senator Elizabeth Warren

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Representative Stephen Lynch

Mayor Robert Hedlund

Mayor Thomas Koch

Mayor Joseph Sullivan

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