

## **Roseland, NJ response to FERC Environmental Assessment**

I am writing as the Mayor of Roseland, NJ to relay to FERC my opposition and that of my constituents relative to the proposed expansion of the Williams Transco compressor station in our borough. We implore FERC to deny a permit for the operations of this facility!

Some history: the subject facility had operated for decades as a natural gas transfer and metering station. Gas was transferred from the pipeline, metered, and sold to the local utility for local distribution. In 2013, with FERC approval, the subject facility was transformed into a mega-facility for the interstate transport of natural gas, including fracked gas, to other parts of the country. A 27,500 horsepower compressor was added to the site, along with many buildings, and the impervious coverage on the site was greatly expanded.

We have been advised by the operators that the new compressor, built five years ago, is rarely in operation. They tell us that the compressor only operates on peak demand days, the coldest days of winter, and that these peak days amount to very few days per year.

The borough questions why an additional, larger, 33,000 hp compressor would be considered for this facility when the existing compressor is barely used.

It is obvious that the local and regional environment will be negatively affected by the proposed expansion of this facility. Additional impervious coverage will occur, and several additional buildings will be constructed. The result will be increased runoff from the site that is the subject of major recurring flooding now!

The increased pressure into the 60-year-old pipeline will most definitely cause leakage of natural gas and its additives into our air and soil and ultimately into the groundwater. This includes the components found in fracked gas.

I find it ironic that the seepage would be permitted to occur right next door to the Essex County Environmental Center, located smack dab in the middle of the Hatfield Swamp, in an area known as the Passaic River basin. This all seems like a recipe for an environmental disaster!

We are not environmental experts, nor are we experts on the transport of natural gas. However, over the course of the past few years, we can all attest that we have been forced to learn more about natural gas and its transmission than should be expected of us as owners of neighboring properties to the subject site.

Earlier this month the chairman of the Roseland Environmental Commission wrote a letter to the editor of our local newspaper. It is in opposition to the expansion of the compressor station facility. The author wrote about being a student of the local grammar school, located about ½ mile from the compressor station, back in 2013 when Williams/Transco performed an unannounced “blow down” of gas and released the gas and its components into the atmosphere. The entire town, along with surrounding communities, were permeated with what the author describes as “toxic air.” The school was evacuated that day and mass hysteria ensued throughout our community. And not a word from Williams Transco. They exhibited indifference and even anger when confronted about the situation.

Since that event, Williams Transco has done little to provide the borough of advance notice of blowdowns at their facility.

The author shared how teachers and students were frenzied and became wary. The entire community was scared for their lives! These are our children!

The chairman goes on to express opposition because the proposed expansion would be located in the Passaic River flood plain and contiguous to a multi-state electric substation, all sitting within 200 feet of the banks of the

Passaic River, in the Hatfield Swamp, an area that has been relatively untouched by human development. The swamp is a habitat for several endangered species which could become further imperiled should you approve the permit. The chairman concludes that: "to build another compressor is to double our environmental risk of imminent decimation."

As an added note, I recall that the expansion of Eisenhower Parkway, a roadway that, if built, may have alleviated traffic congestion in the region, was called off due to the existence of endangered species in the area. Eisenhower Parkway would have run right along the pipeline right of way, so how the roadway project could be squashed and this compressor station could be permitted is difficult to comprehend.

My constituents and I are gravely concerned about our local environment and that of the region. We hope that you will side with us and deny this permit. In doing so you will be doing your part to preserve our natural environment and to advance the public health and safety of the region.

Below is more a more detailed and specific response to the Environmental Assessment which you published on July 17<sup>th</sup>.

Sincerely,

Roseland Mayor John Duthie

"A natural gas compressor station or aboveground interconnect site involves some risk to the public in the event of an accident and subsequent release of gas. The greatest hazard is a fire or explosion following a leak, or rupture at the facility. Methane, the primary component of natural gas, is colorless, odorless, and tasteless. It is not toxic, but is classified as a simple asphyxiate, possessing a slight inhalation hazard. If breathed in high concentration, oxygen deficiency can result in serious injury or death."

-p. 47 FERC Environmental Assessment for Gateway Expansion Project

The Roseland Borough Council, an intervenor in CP18-18, has a number of comments in response to the Environmental Assessment FERC has put together on it.

**1) There is no need for a 33,000 horsepower compressor unit to be added to the existing 27,500 hp unit.**

The Environmental Protection Agency, in their comments on the Gateway Expansion Project (GEP) sent to FERC on June 11, 2018, listed eight "issues (to) be analyzed." Number one called for: "A full discussion of the purpose and need of the proposed project which quantifies energy demand and the need for such facilities in the region, and whether this project is part of or necessary for another project on Transco's pipeline system."

We were unable to find any analysis to this effect in the FERC EA, a very serious deficiency.

We have analyzed this issue and have come to the conclusion that there is absolutely no need for a 33,000 horsepower unit to be constructed next to the existing 27,500 hp one.

The existing 27,500 horsepower compressor is capable of sending almost 1 ½ (1.426) billion cubic feet of gas a day, according to Williams/Transco. Williams has also reported that this plant is rarely used, only during times of high, peak demand on their system, like when it is very cold. The EA states, on p. 50: "Transco states that while utilization of CS 303 horsepower is relatively low on an annual basis, the station is essential for meeting customer demand during times of high system capacity utilization, such as periods of prevailing cold."

How many cubic feet of gas a day, on average, is Williams proposing for their 33,000 horsepower expansion? 65 million cubic feet, 65,000 dekatherms. This is slightly more than 4 ½% of what the existing compressor station is able to pass through. 4 1/2%!

Some more relevant information: In 2016 Williams, after receiving FERC approval, increased the horsepower on the existing compressor by 2500. It went from 25,000 to 27,500 hp. Why? According to Williams, so they could push through 115,000 additional dekatherms.

2500 horsepower for 115,000 dekatherms, and now this proposal for 33,000 horsepower for 65,000 dekatherms?

Williams' proposal is wildly out of kilter. It doesn't make sense, based on their own data and history.

We believe based on knowledge and research that the likelihood is that Williams wants a huge 60,500 hp compressor station in Roseland to ultimately send very large quantities of gas through it. One destination could be a proposed 1200-megawatt, gas-fired power plant in North Bergen in the Meadowlands area of NJ. The 60 year old pipeline coming out of the existing compressor passes through North Bergen. Another possibility, given what is happening within the gas industry, is that this 60,500 hp compressor would be to transport gas for export to other countries.

FERC's "Alternatives" analysis beginning on p. 56 is highly deficient. There is an apparent unwillingness on the part of FERC to do what the EPA suggested was the #1 task they should undertake, "a full discussion of the purpose and need of the proposed project." The "No Action Alternative" on p. 57, for example, reads as if 65,000 dekatherms per day is a significant amount of gas which could not be accommodated by the existing compressor unit. They do not mention the possibility of modification of that one to add horsepower, as took place in 2016 when 2500 horsepower was added for 115,000 dekatherms. This alternative is not mentioned in the listing of "System Alternatives" on pps. 57 and 58.

## **2) The FERC EA demonstrates a lack of knowledge about the flooding issue in Roseland and this area.**

On page 13, the "Flood and Severe Weather" section, the EA begins, "Several commenters expressed concern regarding the potential for the Project to impact or be impacted by flooding or severe weather events. Project areas could be impacted by flash flooding due to proximity to waterbodies and because portions of Project areas would be within the 100-year floodplain (AE Zone) and the 500-year floodplain (X Zone, shaded) as determined by the Federal Emergency Management Agency. AE Zones are subject to inundation by the 1 percent chance of an annual flood event. (Roseland Council emphasis) Specifically, the majority of the Paterson M&R is within the 500-year floodplain and portions of CS 303 are within the 100-year floodplain."

FERC is apparently unaware that there have been three 100 year storms and floods in Roseland within the last 10 years. FEMA may say that the "chance of an annual flood event" is 1%, but based upon the last decade, it is more like 30%. And when these "100 year" storms and floods happened, the wetlands area on which CS 303 is located floods, usually closing down Eagle Rock Avenue for a full day or longer.

Any addition of impervious surface and new and expanded buildings will make this situation worse when the next "100-year" storm and flood hits.

## **3) Water, gas and electricity in close proximity are an accident waiting to happen.**

On page 51 of the EA FERC writes: "We received several comments on proximity of the Project to the existing PSEG station, citing concerns over risks of fires, explosions, risk of injuries from gas leaks and ruptures, and various health impacts. As discussed throughout the document, facilities must be designed to existing federal and state regulations that are designed to minimize the risks of such impacts."

That is a woefully inadequate response to very understandable concerns that many, many Roseland residents have about the existing compressor operation being located in a wetland on a flood plain right next to, not just an “existing PSEG station,” but high-voltage, interstate transmission electrical lines whose capacity was doubled via a Susquehanna-Roseland upgrade several years ago.

It is to be expected that major storms are going to become stronger and more frequent as the climate, and therefore the weather, change as the earth’s atmosphere continues to be heated up by the burning of fossil fuels. This area has already experienced Superstorm Sandy, in 2012, the year before CS 303 was constructed, which saw the downing of hundreds of electrical wires and transformers throughout Essex County and other parts of NJ.

What if a Sandy-type storm, or one even stronger, hits Roseland several years from now? Williams could have its 60,500 horsepower compressor station operating. Very high winds could blow down wires or a transformer along Eagle Rock Avenue or at the high-voltage power lines nearby. The wire could puncture a hole in the gas pipeline feeding the compressor, which a Williams engineering manager admitted in a meeting with Roseland officials several years ago has happened elsewhere, or the electricity from a downed wire or transformer could travel through the water to the compressor site. When the gas and electricity meet, a very destructive explosion would almost certainly take place.

The Gateway Expansion Project, if approved, will make this possibility more possible, more likely and, if it would happen, more destructive.

There is a great need for a credible safety study of this situation and the risks involved before any decision to allow Williams to increase the capacity of the compressor takes place.

**4) There is no serious assessment of the danger of leaks from the 60 year old pipeline coming out of CS 303 and how a 60,500 hp compressor could increase that danger.**

It is common sense to believe that if FERC allows Williams to create a 60,500 hp compressor in Roseland, Williams will look to increase the amount of gas sent through it. As indicated above, that could happen very soon in connection with the proposed 1200 megawatt gas-fired power plant in North Bergen. If this would happen it would inevitably increase the pressure inside that 60-year-old pipeline.

Since, right now, Williams is only saying that they want to send 65,000 dekatherms through this proposed 33,000 hp compressor, which is about 4 ½ % of the flow capacity of the existing CR 303, there does not seem to be a major problem with an increase of pressure within the pipeline. However, this should not be assumed. There should be a full-scale assessment by PHMSA of the condition of that pipeline.

**5) An increase in horsepower at CS 303 will inevitably lead to an increase in the amount of gas leaked and vented into the surrounding neighborhoods.**

It is stated in the FERC EA that there are “fugitive and blowdown emissions” from CS 303. This is true of gas compressor stations generally. If FERC allows the 27,500 hp compressor to become a 60,500 hp compressor, there is no doubt that there will be an increase in these unhealthy emissions.

Roseland residents often smell gas already when they are in the immediate area of CS 303. There should be a serious analysis of this problem, why it is happening and what can be done to correct it before there is an expansion of a primary contributor to gas emissions.

**6) The Essex County Environmental Center immediately adjacent to CS 303 will be negatively affected by an increase in the capacity of CS 303.**

Over the course of a year thousands of people visit the Environmental Center no more than a few hundred feet away from CS 303. There are trails through the woods in between the two buildings that people explore when the weather is warm enough. An increase in the capacity of CS 303 will mean an increase in noise and emissions, which is unhealthy for people and other living things who are in the area. Indeed, it is of great concern to many people that CS 303 was built where it was for just this reason. To expand it would be to add insult to injury.

**7) The EA is deficient in its greenhouse gas emissions and cumulative impacts analysis.**

In EPA's letter to FERC about this EA, they call for a "comprehensive evaluation of cumulative, indirect and secondary impacts" and that this evaluation should include "FERC jurisdictional projects, intrastate pipelines and compression, gathering pipelines, gas processing facilities, gas wells, industrial or commercial facilities, and housing developments."

Within the EA, on p. 52 dealing with "Cumulative Impacts," the EA lists "seven projects identified as possible contributors to cumulative impacts in the area: four roadway rehabilitation projects, an electrical corridor upgrade, an oil pipeline project by Pilgrim Pipeline and development of a waterfront park."

They go on to say, "Comments were received regarding cumulative impacts of the Rivervale South to Market Project and the Northeast Supply Enhancement Project. Based on the geographic scope for cumulative impacts, neither Rivervale South to Market, nor the Northeast Supply Enhancement projects are within any of the areas of impact."

Rivervale South to Market and Northeast Supply Enhancement are both "FERC jurisdictional projects" that are also Williams/Transco projects. They are for the same general purpose as the Gateway Expansion Project: to increase the capacity and capability of Williams to move more gas into and through New Jersey.

To claim that these three Williams projects, taken together, will not cumulatively impact the amount of greenhouse gas emissions put into the atmosphere makes no sense. The fact is that proposals for all three of these projects were submitted to FERC in 2017. They are clearly linked.

The failure of the EA to look at the question of need for this project, as explained in point 1, is another example of not doing the necessary homework and thinking that an EA should reflect. The likelihood of an additional 33,000 horsepower compressor unit ultimately leading to a significant increase of the amount of gas flowing through the compressor, with all the fugitive and blowdown emissions, is nowhere present.

Along these lines, it is reasonable to conclude that the Williams pipeline which goes through North Bergen would be the source of gas for that proposed 1200 megawatt power plant and that the proposed 60,500 horsepower compressor on that pipeline would be employed to push that additional gas along.

All of these related projects should be assessed for their climate impacts, both upstream where hydraulic fracking wells bring up the gas and downstream where it is burned, or shipped overseas for export and then burned.

On the issue of climate impacts, the EA refers to the global heating potential of methane using a 100-year Global Warming Potential of 25 times as powerful as CO<sub>2</sub>. The Intergovernmental Panel on Climate Change, the leading scientific body studying climate change, has put forward the figure of 86 times more powerful over a

20 year period as a better measurement given the urgent need to shift away from fossil fuels to truly clean energy sources with all deliberate speed.

Finally, the EA references a NJ Energy Master Plan from 2011 which “calls for the safe expansion of the natural gas pipeline system in New Jersey.” What it does not reference is the legislation passed and signed by Governor Phil Murphy in May of 2018. The legislation, according to a statement on the governor’s website: “establishes one of the most ambitious renewable energy standards in the country by requiring 21 percent of the energy sold in the state be from Class I renewable energy sources by 2020; 35 percent by 2025 and 50 percent by 2030. . . In addition, Governor Murphy signed Executive Order No. 28 directing state agencies to develop an updated Energy Master Plan (EMP) that provides a path to 100 percent clean energy by 2050. The new EMP is to be completed and delivered by June 1, 2019 and will provide a blueprint for the total conversion of the State’s energy production profile to 100 percent clean energy sources by January 1, 2050.”

This proposed expansion of CS 303 to allow for an increase in the amount of natural gas to come into NJ, with a near-certainty that much more gas would flow through it in the future, is completely at odds with the direction set out by New Jersey this year regarding energy.

**For all of these reasons, we call upon FERC to refuse to grant a permit for the Gateway Expansion Project in its present form.**