I**SSUE: HEALTH IMPACT ASSESSMENT IS NEEDED NEAR PROPOSED COMPRESSOR STATION 206**

Copy to NJDEP: [Ruth.Foster@dep.nj.gov](mailto:Ruth.Foster@dep.nj.gov) and [Megan.Brunatti@dep.nj.gov](mailto:Megan.Brunatti@dep.nj.gov)

Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101), and I am writing to request reconsideration of FERC’s conclusion that “construction and operation of the Project would not have a significant impact on air quality and a health impact assessment for a facility of this size and limited impact is not warranted.” (DEIS – page E-7) I strongly disagree! The size of the proposed facility and the amount of impact are not good enough reasons to decline completing this important assessment to ensure that all environmental impacts are considered with use of current and valid information.

Federal and New Jersey state agencies have recognized airborne chemical emissions as highly toxic to human health and causing a variety of immediate and chronic health conditions for the following that Williams/Transco already reported would be emitted from Compressor Station 206 if it is built: Formaldehyde, Ammonia, Acrolein, Acetaldehyde, Ethylbenzene, Benzene, Toluene, Propylene Oxide & Xylenes. These are not measured or regulated under the NAAQS, so stating in the DEIS that “emissions from Compressor Station 206 would be less than the NAAQS, which were established to protect human health (including sensitive subpopulations such as children or those with chronic illnesses) and public welfare” does not account for measurement of all toxic emissions that can cause us harm and that have been identified to FERC and NJDEP as ones that would be emitted from Compressor Station 206 if it is built.

Just because the reported emissions are ESTIMATED to be below NAAQS does not mean that the emissions during blowdown or at other times would not be so high as to actually cause harm. Additionally, in the Application from Williams/Transco for NESE, they report an expectation, based on modeling, that PM2.5 emissions for Compressor Station 206 and background air would approach the minimally “acceptable” thresholds:

Annual: 10.1 microgram/m3 (EPA-NAAQS threshold: 12 microgram/m3 )

24-hour 32.1 microgram/m3 (EPA-NAAQS threshold: 35 microgram/m3 )

There are current studies that report health impacts from emissions around natural gas compressor stations that FERC staff should review and analyze before deciding about whether or not to do something that could help protect us.

Recognizing that the final controls and mitigation “recommendations” FERC will issue are not yet published, we should at least know that the Federal and State agencies independently assessed the risks, reviewed current studies about impacts from these pollutants on human health, and required additional data to help protect us.

In conclusion, I request that FERC complete a more robust analysis of the potential environmental health impacts and require completion of a Health Impact Assessment in the areas around the proposed Compressor Station 206 site.

Some studies of **Health Hazards of Emissions from Natural Gas-Fired Compressor Stations =**

Bowe, B., Xie, Y., Li, T., Yan, Y., Xian, H. & Al-Aly, Z. (2017, September 21). Particulate matter air pollution and the risk of incident CKD and progression to ESRD. Journal of American Society of Nephrology, 29: 218-230. Retrieved from <http://jasn.asnjournals.org/content/29/1/218.full.pdf+html>

Compendium of scientific, medical, and media findings demonstrating risks and harms of fracking (unconventional gas and oil extraction) (5th ed.) (2018, March). Concerned Health Professionals of New York & Physicians for Social Responsibility. Retrieved from <http://concernedhealthny.org/compendium/>

Kloczko, N. (2015, November). A brief review of compressor stations.  Southwest Pennsylvania Environmental Health Project. Retrieved from <http://www.environmentalhealthproject.org/files/A%20Brief%20Review%20of%20Compressor%20Stations%2011.2015.pdf>

NY Compressor Station Report. Retrieved from http://www.environmentalhealthproject-ny.org/

Russo, P.N. & Carpenter, D.O. (2017, October 12). Health effects associated with stack chemical emissions from NYS natural gas compressor stations: 2008-2014. Institute for Health and the Environment - A Pan American Health Organization / World Health Organization Collaborating Centre in Environmental Health, University at Albany.

Retrieved from <https://www.albany.edu/about/assets/Complete_report.pdf>

Summary of Minisink Monitoring Results.

Retrieved from <http://www.environmentalhealthproject.org/resources/10/click/5>

Summary on compressor stations and health impacts. (2015, February 24). Southwestern Environmental Health Project. Retrieved from <http://www.environmentalhealthproject.org/files/Summary%20Compressor-station-emissions-and-health-impacts-02.24.2015.pdf>

The hazards of a compressor station: A town wakes up to the realities of corporate deception. (2015,

November). Retrieved from <http://350ma-berkshires.org/the-hazards-of-a-compressor-station-a-town-wakes-up-to-the-realities-of-corporate-deception/>