**ISSUE: SAFETY –**

**PROXIMITY OF TRAP ROCK QUARRY BLASTING AND THE PROPOSED COMPRESSOR STATION 206**

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Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101). I am writing because I am concerned that the analyses of potential environmental and safety impacts from Compressor Station 206 construction/operation and the nearby mining operations at Trap Rock Quarry were not thoroughly analyzed.

In response to numerous comments from residents and elected officials about concerns pertaining to the impacts of Trap Rock Quarry’s ongoing mining operation which includes the use of dynamite blasting, the FERC staff pointed to the *Geotechnical and Vibration Analysis Report for Compressor Station 206,* available on the FERC docket, and FERC staff wrote, “Transco also committed to incorporate safety factors in the final foundation designs to prevent displacement if future blast intensity increases. We conclude that Compressor Station 206 would be adequately protected from blasting activities at the Trap Rock quarry and, in section 4.11.4, we recommend that Transco file its final foundation designs prior to construction.” (DEIS, pages ES-4,5)

The potential increases in blasting intensity are certainly a valid consideration meriting further analyses. Without that information, the conclusion of the FERC staff in the DEIS is not valid.

Additionally, FERC’s assertion that the compressor station would be safe even though they have not reviewed the final foundation designs does not seem to fully assess potential impacts.

Comments that were ignored by FERC’s responses pertained to requesting analyses of cumulative year-after-year impacts on the foundation of the compressor station. This year-after-year cumulating impact was not addressed in the *Geotechnical and Vibration Analysis Report for Compressor Station 206.*

The DEIS information provided by FERC staff on page 2-52 mentions: “After foundation construction, the buildings would be erected and equipment would be constructed and installed by skilled laborers in accordance with applicable building codes and manufacturer’s instructions. Construction would be conducted in compliance with applicable state and local building codes and subject to inspection for permitting authorities.”

Question: Do state and local building codes require analyses of the impacts of blasting vibrations over decades? This was not adequately addressed in the DEIS.

Additionally, by mentioning safety features which would be on the compressor units - “bearings that are designed to meet equipment vibration specifications. Normal vibration associated with operation of the compressor station, coupled with the periodic displacements from blasting, would not exceed the vibration limits on the unit bearings. For added safety, each compressor unit would include 16 vibration monitors, and the vibration monitoring system would initiate a shut-down of the compressor unit if vibrations were detected in excess of unit bearing limits, regardless of the source or cumulative effect of vibrations,” (DEIS – page ES-5), the impact on the actual foundation from decdes of blasting was not accounted for.

Furthermore, FERC has not independently assessed the long-term potential impact of frequent dynamite blasting on the compressor station’s foundation, building and equipment. Additionally, FERC’s conclusion that “Compressor Station 206 would be adequately protected from blasting activities at the Trap Rock quarry” was followed by a statement about their request for missing information: “and, in section 4.11.4, we recommend that Transco file its final foundation designs prior to construction.” (DEIS, pages ES-4, ES-5)

To provide the public with information required for making meaningful comments, I request that FERC require a more comprehensive analysis of the potential cumulative (year-after-year) impacts of the blasting at Trap Rock Quarry on the compressor station and also publish their independent analysis of the final foundation designs. Without doing so, and without affording the public an extended “comment period” following publishing of whatever information can be publically-viewable, FERC has not adequately determined that the compressor station would be safe for its lifetime of operations, if it is built.