

Other

From a review of the “Fact Sheet” (June 2019) that was provided with the applications to NJDEP, the amount of misinformation as well as lacked responsiveness provided by Williams/Transco should give those in the NJDEP who are responsible for reviewing the applications cause for cautious skepticism about all information in the applications. Additionally, some of the answers to questions in this format were not responsive, and others raised further questions about the NESE Project.

Pages 1 & 2 –

There is no “upside” to the NESE Project for Franklin Township.

Notations about economic “benefits” (from the Rutgers report) were refuted by The Goodman Group Ltd. report (5-14-18).

Indirect “benefits” to New Jersey include unsubstantiated claims of:

- displacing 900,000 barrels of heating oil
- reducing CO₂ by up to 200,000 tons in the first year which will improve regional air quality and is akin to removing 500,000 cars
- reducing other emissions in the first year including smog, acid rain and particulates that cause negative impacts on NY’s neighboring state of NJ

NOTE: There were no baselines reported for these, so this cannot be considered to be a true assertion. Additionally -

Smog is a not an emission – It is a type of severe air pollution. The word "smog" was coined in the early 20th century, and is a contraction of the words smoke and fog to refer to smoky fog; its opacity, and odor. The word was then intended to refer to what was sometimes known as pea soup fog, a familiar and serious problem in London from the 19th century to the mid-20th century. This kind of visible air pollution is composed of nitrogen oxides, sulphur oxides, ozone, smoke and other particulates. Man-made smog is derived from coal combustion emissions, vehicular emissions, industrial emissions, forest and agricultural fires and photochemical reactions of these emissions.

Acid rain is a rain or any other form of precipitation that is unusually acidic, meaning that it possesses elevated levels of hydrogen ions (low pH). It can have harmful effects on plants, aquatic animals and infrastructure. Acid rain is caused by emissions of sulfur dioxide and nitrogen oxide, which react with the water molecules in the atmosphere to produce acids. (Wikipedia)

“Construction and operation emissions from the NESE Project would increase the atmospheric concentration of GHGs, in combination with past and future emissions from all other sources, and contribute incrementally to future climate change impacts.” (FERC’s FEIS 1/25/19 – Section 4.12.4 on page 4-389)

Williams/Transco wrote that all mitigation projects would be received by New Jersey (truck replacement and diesel upgrades to reduce NO_x), yet they neglected to acknowledge that this is required for General Conformity since their construction emissions of NO_x exceed allowable limits by the amount that they plan to offset with these projects, and they neglected to note that they proposed a \$3.4 million mitigation project for New York after calculating 25-cents per destroyed clams for an oyster restoration project at the end of Long Island and not in the area where the NESE Project would kill clams. Williams’ price per clam (\$.25) divided into its proposed contribution to the Shellfish Restoration Project (\$3.4 million) amounts to **13.6 million clams killed as a result of this project**. No amount of money could ever make up for the harm that such a loss will inflict on our harbor.

Page 3 –

It is not true that an electric compressor station would require electric lines to cross the Delaware & Raritan Canal. Also – There’s no documentation about consultation between PSE&G and Williams/Transco or their contracted groups about this.

Page 4 –

They wrote that the existing pipeline that CS206 would connect to = Class 1. However, they later wrote that the pipelines that CS206 would connect to are those that were moved & replaced in 1987 as Class 3 – Trap Rock Quarry lines (see page 6).

Pages 5 & 20 –

They wrote that they are now proposing to install potable water tanks for operational water at CS206. This is new, and it should be explored in light of plans that have the water lines under the proposed access road as well as the need for access to water by first responders.

Page 7 –

Blast Vibration analyses did not include modeling of accumulated impact from TRQ blasting.

Page 15 –

They noted that they can't estimate CO₂ emission rate without knowing the turbine selection & key operating parameters (annual natural gas usage) which is not yet finalized.

Page 18 –

They note that the compressor station piping can only be vented by a Transco employee through a silencer. Question: What if it needs to be done beyond the business hours when a Transco employee will be on site?

Page 19 –

They ask a question about a firewater pond & diesel-driven firewater pump with hydrants & monitors around the compressor station site, but their answer does not respond to this. They just list safety plans & write that a fire outside the compressor station would be addressed by local first responders.

Page 20 –

They still say that the offshore construction would last for 12 months beginning Q2 2020 (and their recent submission to NYSDEC has it lasting only 7 months). Their answer here does not address their question about marine life impacts.

Page 21 –

Quality of life & health concerns (CS206) – They did not answer the question, and reliance on only NAAQS does not include other toxic emissions.