



**GRASSROOTS**  
Environmental Education

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September 4, 2015

U.S. EPA Administrator Gina McCarthy  
U.S. Environmental Protection Agency  
Office of Administrator  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

Via Email to: [McCarthy.Gina@epa.gov](mailto:McCarthy.Gina@epa.gov)

Re: Petition to U.S. EPA to object to Algonquin Incremental Market Air Title V Permits issued by  
New York State Department of Environmental Conservation  
Application ID: 3-3730-00060/00013 – Air Title V – Southeast Compressor Station  
Application ID: 3-3928-00001/00027 – Air Title V – Stony Point Compressor Station

Dear Administrator McCarthy:

Please consider this letter and attachment as a formal petition pursuant to 40 CFR 70.8 (d) to object to Title V Air Quality Permits issued to Spectra Energy by the New York State Department of Environmental Conservation for the expansion of the Southeast Compressor Station in Putnam County, New York and the Stony Point Compressor Station in Rockland County, New York as part of Spectra Energy's Algonquin Incremental Market (AIM) pipeline expansion project.

We write on behalf of several independent scientists and researchers whose peer-reviewed research and data was cited in comments submitted to the New York State Department of Environmental Conservation (DEC) regarding public health impacts of the proposed AIM project to correct inaccuracies, misstatements and omissions made by DEC in their published responses. We believe the EPA, in its capacity of oversight over Title V permits, should have the benefit of clarification from the experts, as they pertain directly to EPA and DEC's mandate to protect public health and environmental quality.

As an overall comment, we are disturbed by DEC's position that the natural gas flowing through the AIM pipeline will be substantially different from the gas originating at wellheads in Pennsylvania, Ohio and West Virginia. This unproven and nonsensical assumption is used by DEC to dismiss some of the most valuable independent research we have on health impacts of exposure to emissions from natural gas operations, both at unconventional drilling sites and at various transportation facilities. We urge EPA to

reject DEC's dismissal of these studies and to question DEC's reliance on best-case industry model projections.

We are also troubled by DEC's cavalier dismissal of matters relating to radiation. The DEC uses an industry-sponsored study, purporting to show that in-home radon levels from gas extracted from the Marcellus Shale will be low, to dismiss legitimate and scientifically sound concerns about radon in natural gas transmitted through pipeline infrastructure. The DEC quotes FERC as reporting a decay time of "less than one hour" for "radioactive decay products in the pipeline," without explaining how the industry is able to reduce the decay time for radon (universally recognized as about 3.8 days) so drastically, or account for radon progeny, polonium and lead with half-lives of 138 days and 22.3 years, respectively.

Finally, we are aware that several prominent researchers have been evaluating the tools currently being used to measure air pollutants, concluding that some environmental monitoring protocols are incompatible with the goal of protecting the health of those living and working near gas operations, including facilities like the compressor stations under review here. We urge EPA to continue its dialogue with these scientists, especially as their research may inform EPA about the actual level of pollutants, and not the reassuring industry projections which rely on outdated and insufficient monitoring methods.

Whether or not the recent studies confirming higher-than-expected levels of pollutants found at compressor stations and the studies showing that existing monitoring methods may dramatically underestimate those pollutants constitute "newly discovered material information" that would argue for a denial of the permit by NYS DEC is a question we hope that EPA will consider carefully.

The follow-up comments of the scientists and researchers are attached. I hope you will share these with EPA staff charged with reviewing the Title V Air Permits.

Thank you for your careful consideration of these comments and your efforts to protect the health and safety of all Region II residents who will be exposed to the air pollution from this massive build-out of gas transportation infrastructure.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Wood', with a long horizontal flourish extending to the right.

Douglas A. Wood  
Associate Director

cc: Ms. Judith A. Enck, Regional Administrator  
U. S. Environmental Protection Agency Region 2  
Via Email to: [Enck.Judith@epa.gov](mailto:Enck.Judith@epa.gov)