



The Commonwealth of Massachusetts

Senate

State House • Boston • 02133

July 11, 2019

Martin Suuberg, Commissioner
Department of Environmental Protection
One Winter Street, 2nd Floor
Boston, MA 02108

Dear Commissioner Suuberg:

We the undersigned, write out of strong concern for the circumstances and procedure that surround Algonquin Gas Transmission, LLC's ("Algonquin") application to construct a natural gas compressor station in North Weymouth.

Since the project was first proposed to the Town of Weymouth by Spectra Energy in 2015, this issue has proven to transcend municipal concern. As we have seen, local movements against natural gas infrastructure have grown from local to regional to statewide concern. The proposal to construct a carcinogen-emitting compressor station directly adjacent to wetlands, public use waterways, and two environmental justice neighborhoods brings into question the public health, safety, and energy policy of the Commonwealth as a whole.

In 2008, the Massachusetts State Senate voted to pass the Global Warming Solutions Act, which requires our Commonwealth to achieve greenhouse gas ("GHG") emission reduction goals between 10-20% below statewide 1990 GHG emission levels by 2020. A single compressor station emits over 52,000 metric tons of carbon dioxide annually—the equivalent of adding 1.1 million cars to our roads annually, which will further hinder the Commonwealth from meeting its statutory obligation to satisfy carbon emissions reduction goals.

The Senate continues to be a leader on clean energy initiatives. Last session, the Senate Committee on Global Warming and Climate Change conducted hearings across the state to discuss the importance of renewable energy as part of the Clean Energy Future tour. In the past, the Senate has voted to lift the cap on solar net metering projects, to take aggressive approaches to offshore wind procurement goals, to prohibit "pipeline taxes", and to ban natural gas fracturing in the Commonwealth.

Pipeline expansions in one community impact the climate change goals of the entire state and are counter to the clean energy policies that we have been promoting as a body. That is why in 2017, opposition from affected communities and the broader legislature successfully defeated the Kinder Morgan pipeline expansion in Western Massachusetts. We rise again today in opposition to the proposed compressor station in the Fore River Basin.

Compressor stations are known to sustain a constant threat to their surrounding communities. These stations routinely conduct what are known as “blowdowns”, which are frequent and intentional releases of the potent greenhouse gas, methane, and toxic or carcinogenic volatile organic compounds. Facility malfunctions occur frequently, most recently in January 2019, when a compressor station in Armada, Michigan exploded and caught fire. It is because of incidents like this that compressor stations are routinely situated in remote, rural areas on parcels of land at least 50 acres in size.

The proposed Weymouth site is a 4-acre parcel of land abutting the newly completed Fore River Bridge and across the river from a palm oil factory, a fertilizer plant, a hazardous waste facility, an oil tank farm, and two power plants. There are around 930 homes within a half-mile of the site and 3,100 children who live or go to school within one mile of the site. This would also be the first compressor station to be located on a public waterway, only a few feet above sea level. The stark contrast between the Weymouth site and typical compressor station parcels represents a dangerous precedent that the Commonwealth would be setting if this project were to move forward.

Air quality monitoring data collected by local physicians and climate experts found repeated levels of benzene and formaldehyde that exceed the state's own Ambient Air Limit. After approval of the air quality plan for the project, the Massachusetts Department of Environmental Protection (DEP) subsequently admitted it had two additional sets of air quality data that it withheld from interested parties including local residents and appealing parties. These tests showed that concentrations of cancer-causing and toxic air pollutants such as acrolein, acetaldehyde, and 1,3-butadiene frequently exceed the state's safe exposure limits.

The surfacing of this data is especially relevant to the two Environmental Justice neighborhoods adjacent to the proposed compressor site. These communities, which already bear a disproportionate share of negative health and environmental impacts, would be further afflicted by the introduction of a compressor station. Because of their status as Environmental Justice neighborhoods, additional consideration should be given to any project that would expose them to additional environmental blight, and yet the opposite has occurred. They have not received the degree of protection that they are promised by state statute, raising concerns of injustice and the infringement on the rights of citizens who are already disadvantaged.

In the appeal hearing for the air quality plan, the DEP emphasized that they do not consider background concentrations of pollutants that would be released by the compressor station to be relevant. Instead of proposing remedies for the air quality problems that were verified by their own testing, the importance of those results has been downplayed. It does not appear that any concentration of toxic or cancer-causing pollutants would warrant action by the DEP. Instead, it is clear that the residents and communities of the Fore River Basin would bear exceptionally and disproportionately greater risks than existing communities with compressor stations, and that their pleas for justice are falling on deaf ears.

Over the course of the past several weeks, the surfacing of new data and lack of transparency throughout air quality permit plan approval hearings has proven the permitting and administrative appeals process to be flawed. The Metropolitan Area Planning Council (“MAPC”), which conducted the state-ordered health impact assessment of the Fore River Basin, has publicly urged the DEP to prevent the project from advancing. The DEP has confirmed that they relied on insufficient air quality data when issuing permit plan approvals. Considering the impact that this project would impose on public health, it should

be presumed that our standards of adjudicative transparency would be upheld to the highest degree. Unfortunately, the opposite has been the case, and public trust is lost.

The administrative proceedings surrounding the Weymouth compressor station application are fraught with errors, inaccuracies, and obstructions. Because of this, combined with the overall environmental and public health implications of the project, we believe that the DEP should rescind all permits pertaining to Algonquin's application predicated upon the many permitting appeals filed by citizen groups and affected municipalities, and reevaluate the proposal in light of the facts and in a publicly transparent fashion. As a Commonwealth, we should all be in approval before moving forward with something as precedent-setting as this.

For the reasons stated above, we stand opposed to the application to build a compressor station in Weymouth and the threat it would pose to the Commonwealth as a whole.

Sincerely,



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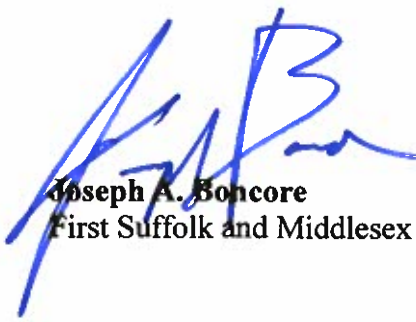
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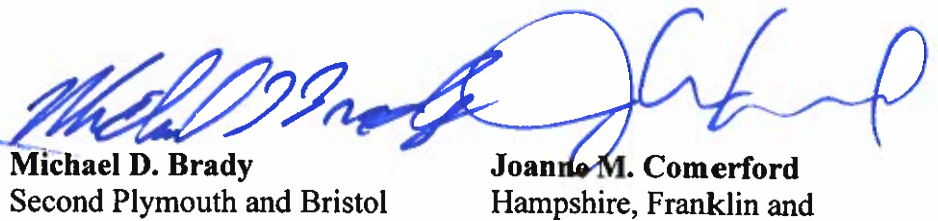
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Cape and Islands



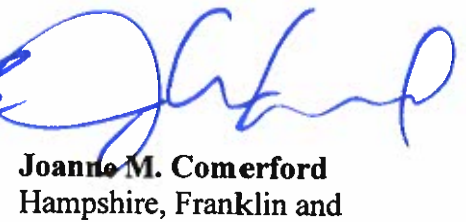
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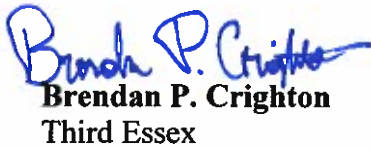
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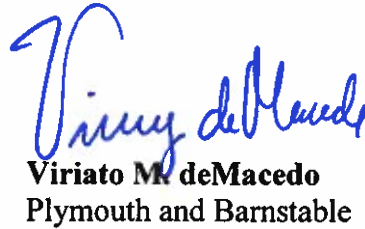
Michael D. Brady
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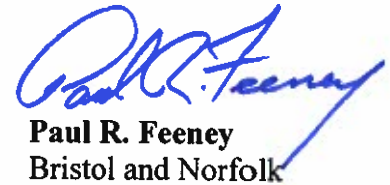
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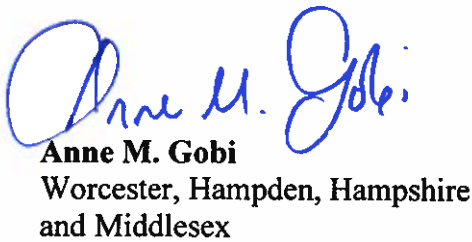
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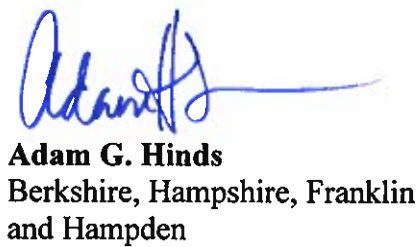
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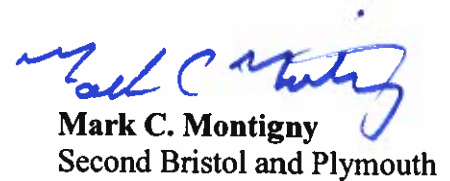
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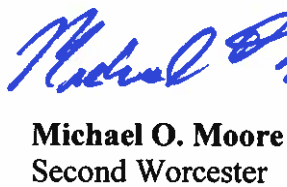
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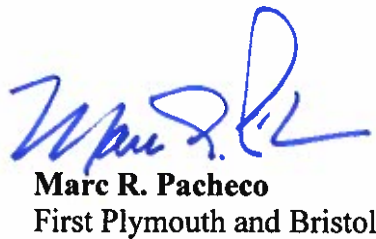
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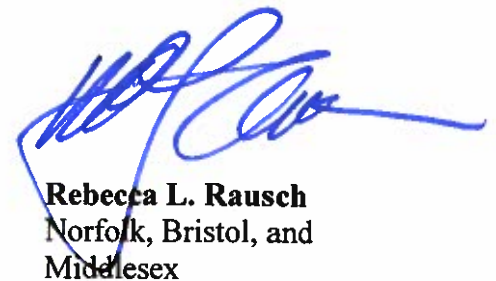
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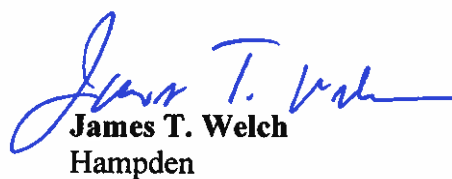
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