

16 December 2022

Pennsylvania Department of Environmental Protection
Attn: Edward Painter, Air Quality Engineering Specialist
400 Waterfront Dr
Pittsburgh, PA 15222

Re: Comment on Eastern Gas Transmission and Storage, Inc. J.B. Tonkin gas compressor station
(Operating Permit 65-00634)

Dear Mr. Painter,

Eastern Gas Transmission and Storage, Inc's (Eastern) application to renew the air pollution permit for the J.B. Tonkin Compressor Station (65-00634) in Murrysville of Pennsylvania is a **direct threat the health of residents living near the facility and Westmoreland County's air quality; therefore the approval of the permit is a false pretense of safety posed by the Pennsylvania Department of Environmental Protection (DEP).**

The request for a natural minor State Only Operating Permit, rather than a major source permit, is inadequate and should not be approved by the DEP. The 500-hour restriction on the operation of the newly installed Caterpillar G3512 auxiliary generator should, alone, require this permit be listed as a synthetic minor permit due to restriction on operation time. It is also inappropriate to exempt this pollution source's volatile organic compound (VOC) emissions in the potential to emit (PTE) worksheet for the proposed permit renewal. Although the installation of this equipment was exempt from a plan approval, that does not exempt its emissions from being included in the required renewal of the facility's operating permit, particularly given that the reduction of VOC emissions is the justification for the proposed minor source status.

Similarly, the proposed permit renewal does not contain any explanation of the use of the facility's auxiliary generator, including hours of operation for the previously used generator and/or a history of Emergency Shutdowns (ESD) at the site. In fact, the only discussion of ESDs in the proposed permit renewal is in reference to pollution incidents at other related compressor stations like Eastern's Perulack Station, including one incident on 4/21/21 where power was lost at the compressor station and the auxiliary generator also failed. In order to assess the 500 hour restriction on the newly installed auxiliary generator, a history of auxiliary generator use at the

site should be included in the permit application. Similarly, the proposed permit renewal contains no explanation of the history of blowdowns at the site and how the emissions estimates from this source were calculated.

Most concerning is the large deviation in the potential to emit (PTE) figures in the currently proposed permit renewal compared to the PTE figures related to two separate technology modifications made at the facility in 2021. Sitewide speciated hazardous air pollutants (HAPs) are simply not included in the PTE figures related to the permit renewal application while speciated HAPs are listed related to the two 2021 technology modifications. Emissions estimates related to the two 2021 modifications include significantly different PTE figures for several pollutants, specifically VOCs and HAPs, that could require a major source permit. DEP should require Eastern to speciate HAPs in the current permit renewal application in order to demonstrate that formaldehyde emissions are below the 10 tons per year (TPY) major source threshold, particularly given that the pollution control technology added to Engine #1 (Source 102) is the justification of this facility's proposed minor source status. In terms of VOC emissions, in a letter sent on October 5, 2021, VOC emissions from Source 102 are listed as 41.62 TPY after the installation of the pollution control technology but then listed as 24.45 TPY in the permit renewal application filed on March 14, 2022. Similarly incongruent, HAP emissions from Source 102 are listed as 12.72 TPY in the October 5, 2021 plan approval application, but then 10 TPY in the March 14, 2022 permit renewal application. Both of these deviations could result in the facility qualifying as a major pollution source. DEP must require Eastern to explain these conflicting pollution estimates.

It is additionally concerning that only 4 days after the permit renewal application was submitted, DEP discovered an air pollution violation regarding a "Stack Test Compliance Evaluation" at the JB Tonkin compressor station seen [here](#)¹. The Department of Environmental Protection should require Eastern to resubmit this proposed permit renewal application with details regarding this air quality violation, particularly if it is related to the newly installed auxiliary generator and/or the oxidation catalyst installed on Source 102.

Similarly, this proposed air permit should not be approved until the "consent order agreement" between Eastern and DEP is finalized related to the September 15, 2021 emissions limit

¹ https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3397072

exceedance of formaldehyde from Source 102 that initiated the installation of an oxidation catalyst. This emissions violation is particularly concerning because it was not an isolated incident but rather a misestimation of the continuous emissions of the probable carcinogen formaldehyde. Eastern had previously claimed a 1.94 lb/hour emissions rate of formaldehyde from Source 102 that was found by DEP to be 3.36 lb/hour. Eastern is now proposing a pre-control 3.3 lb/hour formaldehyde emissions rate that is controlled to achieve a 1.3 lb/hour emission rate. More information is needed about the cause of this misestimation before a minor source air permit should be granted at this facility.

Please require Eastern to resubmit this air pollution permit renewal application to address these issues.

Regards,

Russell Zerbo
Advocate
Clean Air Council



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Staff Environmental Scientist
Protect PT



Gillian Graber
Executive Director
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