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Sent by eFile

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Comment on CP25-528-000

Protect PT is a nonprofit organization dedicated to ensuring residents' safety, security, and quality of life by engaging in education and advocacy to protect the economic, environmental, and legal rights of the people in Westmoreland and Allegheny counties. Protect PT submits this comment on docket no. CP25-528-000, regarding the environmental impacts of Eastern Gas Trans & Storage Inc.'s ("EGTS") Appalachian Reliability Project ("ARP") in Westmoreland County, and reasonable alternatives to this project that will better safeguard the environmental health of residents in Westmoreland County. Protect PT's interest in this project derives from its members who reside less than a mile from ARP infrastructure and some of whom send their children to the Franklin Regional Primary School, less than a mile and a half away from ARP infrastructure. Protect PT asks that the Federal Energy Regulatory Commission ("FERC") deny a Certificate of Public Convenience and Necessity ("CPCN") to EGTS for the ARP under 15 U.S.C. § 717f(e).

Based on the Air Quality General Permit 5 ("AQ GP 5") [application](#) by EGTS to the Pennsylvania Department of Environmental Protection ("DEP") for the JB Tonkin Compressor Station and Exhibit F-I of the Resource Report submitted to FERC by EGTS, granting this permit **would not be in the public convenience and necessity**. The ARP would severely pollute

the air in Murrysville with increased quantities of criteria air pollutants, hazardous air pollutants (“HAPs”), carbon dioxide, and noise, creating a severe impact on the surrounding community that EGTS has not proposed to adequately mitigate.¹ FERC should consider these impacts as part of its review of EGTS’s application under the National Environmental Policy Act of 1969 (“NEPA”). FERC should further consider the accuracy of these reported emissions quantities in light of 2022 reports of the total Potential to Emit (“PTE”) of the JB Tonkin Compressor Station having given greater PTE values for a wide range of air pollutants. In the absence of significant emissions reductions in the time between these 2022 reports and the 2025 data provided to the DEP by EGTS, FERC should conclude that the true baseline values for PTE at the JB Tonkin Compressor Station are likely higher than reported in EGTS’s data provided in 2025, and so the cumulative impact of the new proposed emissions will have an even more severe, detrimental impact on the surrounding community. FERC should also factor in the radioactive particulate emissions that will be produced by the additions to the JB Tonkin Compressor Station and violations by EGTS at the JB Tonkin Compressor Station and other Pennsylvania facilities, as well as leaks and damage to Pennsylvania’s air and waters from the TL-636 pipeline. At the same time, FERC should consider increased emissions from the ARP’s other facility modifications in Westmoreland County, including those at the Delmont M&R Station in combination with existing emissions from the nearby Oakford Compressor Station and the Rock Springs Compressor Station. Considering all of these issues compared to the benefits of available alternatives for meeting Pennsylvania’s energy needs, FERC should deny a CPCN for the ARP.

¹ See Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC 61,227, P. 24 (1999)

Impacts from the JB Tonkin Compressor Station

To summarize, the AQ GP 5 application proposes that EGTS should be permitted to significantly increase the Compressor Station's emissions of nitrogen oxides by 34% to 95.08 tons per year ("tpy"), carbon monoxide by 16% to 31.40 tpy, sulphur dioxide by 29% to 1.40 tpy, all particulate matter by 49% to 13.41 tpy, HAPs by 18% to 14.19 tpy, and **CO2 equivalent emissions by 328%** to 128,495.79 tpy. This is despite the DEP's decision to downgrade the Compressor Station from a major source of air pollutants to a minor source of air pollutants in 2022.

Previous testing failures, combined with EGTS's estimate that the nitrogen oxides potential emission level will be 95.04 tpy, suggest the potential emissions of nitrogen oxides could exceed the 100 tpy limit per 40 C.F.R. § 51.165(a)(iv)(A)(2) and make the Compressor Station a major source since it is in the 42 U.S.C. § 7511c(a) ozone transport region.² This would require EGTS to apply for major source permitting for the Compressor Station, which EGTS has not done. In light of the significant likelihood that the nitrogen oxide emission levels at the facility will exceed 100 tpy if this permit is granted and the low probability of effective enforcement of a 100 tpy nitrogen oxide permit condition, **FERC should find that the creation of an unpermitted major source is not in the public convenience and necessity.**

The Compressor Station has a long recorded history of fugitive emissions, including [11 sources of fugitive methane emissions](#) found by the DEP in 2019 after community members reported unpermitted, odorous emissions from the Compressor Station. This is consistent with a

² See *infra*, Impacts of EGTS's Violations of State and Federal Environmental Law.

wider trend of [underestimating fugitive methane emissions](#) in the oil and gas industry due to abnormal operating conditions, causing excessive fugitive emissions of 2.3%, above standard estimates of 1.4%. The odorous emissions from the JB Tonkin Compressor Station further undermine EGTS's promise that the new compressor infrastructure will not produce odorous emissions beyond the property line, which will create a nuisance to nearby residents. These odors, as well as the added noise from the proposed additional compressor engine will all contribute to an even more severe nuisance created by the JB Tonkin Compressor Station than already exists. The application further does not include up-to-date testing of overall potential emissions, including fugitive emissions, from the actual compressor unit proposed by EGTS to be installed at the JB Tonkin Compressor Station. FERC is left to rely on less reliable manufacturer specifications and emissions modeling estimates to determine whether granting this permit will result in 95.04 tpy of potential nitrogen oxide emissions, or the just 5.2% more required over the numbers provided by EGTS to make the JB Tonkin Compressor Station a major source. Given only this information, **FERC should exercise prudence and err on the side of protecting the public from fugitive emissions and related nuisances by denying a CPCN for the ARP.**

Such prudence is especially warranted since [an emissions summary from three years prior](#) on March 14, 2022 indicated that, at that time, the facility-wide PTE from the JB Tonkin Compressor Station consisted of 86.94 tons of nitrogen oxides, 43 tons of VOCs, 42.33 tons of carbon monoxide, 10.91 tons of PM10, 10.91 tons of PM2.5, and 11.98 tons of all HAPs combined. These numbers differ significantly from the existing facility-wide PTE listed in Table 4-1 of EGTS's AQ GP 5 application. It is possible that the existing facility-wide PTE was

reduced in the past three and a half years, but according to Appendix B-1 of EGTS's AQ GP 5 application, the facility-wide emissions were taken from Section C, Condition No. 008 of DEP Permit No. 65-00634. In other words, EGTS assumed that its existing facility-wide PTE was in compliance with existing permits, rather than calculating the existing facility-wide PTE. This is suspect given that compliance with the existing minor source permit would then require that the JB Tonkin Compressor Station have seen an 18% reduction in nitrogen oxide emissions, a 26% reduction in VOC emissions, a 36% reduction in carbon monoxide emissions, an 18% reduction in particulate matter emissions, but essentially no change in HAP emissions, all over the same three and a half-year period. Given these significantly higher emissions in multiple categories three and a half years ago, FERC should deny a CPCN until and unless EGTS can explain how it concluded that the existing facility-wide PTE taken from Permit No. 65-00634 accurately describes the actually existing facility-wide PTE. This is especially concerning given that, if the facility-wide PTE from the JB Tonkin Compressor Station is accurately described by the facility-wide PTE from March of 2022, the addition of the new combustion turbine and associated components and processes would undoubtedly require a major source permit under Title V.

The emissions from this facility will also include a wide range of HAPs, including 1,3-Butadiene, acetaldehyde, acrolein, benzene, ethylbenzene, formaldehyde in amounts exceeding one ton per year, Polycyclic Aromatic Hydrocarbons (PAH), propylene oxide, toluene, and xylenes. According to the [EPA](#), sustained exposure to 1,3-Butadiene can cause heart disease, blood and liver disorders, reproductive health harms to developing fetuses, and leukemia. Sustained exposure to acetaldehyde can cause respiratory damage, reproductive health harms to

developing fetuses, and potentially cancer. Sustained exposure to acrolein can cause respiratory congestion and irritation of the skin, eyes, nose, and throat. Sustained exposure to benzene can cause blood and bone marrow disorders, aplastic anemia, leukemia, excessive bleeding, and immune system damage. Sustained exposure to ethylbenzene can potentially cause damage to the blood, liver, and kidneys. Sustained exposure to formaldehyde can cause respiratory damage, eye, nose, and throat irritation, possible reproductive system disorders, and cancers. Sustained exposure to naphthalene can cause cataracts, retinal bleeding, chronic respiratory inflammation, and hemolytic anemia, including in fetuses of exposed mothers. Sustained exposure to [PAH](#) can cause kidney and liver damage, respiratory damage, asthma, COPD, and cancer. Sustained exposure to propylene oxide can potentially cause stunted weight growth, mortality, and inflammatory lesions, though its impacts in humans are understudied. Sustained exposure to toluene can cause respiratory irritation, dizziness, headaches, sleeping disruption, and damage to the liver, kidneys, lungs, and ears. Sustained exposure to xylenes can cause headaches, dizziness, fatigue, loss of coordination, short-term memory loss, concentration difficulties, lung and heart damage, liver damage, and skeletal damage as well as decreased fetal body weight in fetuses of exposed mothers.

This extensive recitation of the symptoms and harms to human health that will be caused by the expansion of EGTS's JB Tonkin Compressor Station underlines just how damaging to the environment this decision will be for current and future generations of Pennsylvanians. The harm to these residents from the expansion of the Compressor Station will be shared by the [approximately 695 children](#) who attend school 1.4 miles away at the Franklin Regional Primary School. Even if the total quantity of HAPs emitted by the facility will not exceed 25 tpy, the

increase in these HAPs to a total quantity of 14.19 tpy will pose an unacceptable cost to the health and safety of the [over three thousand people](#) living within two miles of the Compressor Station. These residents are already exposed to more air pollutants such as ozone and particulate matter than the overwhelming majority of Pennsylvanians and will be cumulatively impacted by the addition of more than two tons per year of additional HAPs to their local air. Exacerbating the harms created by their environment even further by allowing EGTS to emit even more hazardous air pollutants will cumulatively impact their environment and risk violations of federal law meant to protect clean air both in the ambient and the local environment. These exacerbations of environmental harms in a community already suffering disproportionate burdens from pollution compared to statewide averages across Pennsylvania additionally implicates environmental justice concerns. **This is why it is especially important that FERC conduct a public scoping meeting in Murrysville regarding the ARP.**

On the topic of exposures to particulate matter, the ambient particulate matter exposure of residents in the two miles surrounding the JB Tonkin Compressor Station is already 8.58 micrograms/cubic meter. In 2024, the Environmental Protection Agency passed a final rule in 89 Fed. Reg. 16202 that set a primary annual PM2.5 standard of 9 micrograms/cubic meter, meaning that the local area would require only a 5% increase in PM2.5 levels to exceed the annual PM2.5 standard. EGTS's application for a permit to emit an additional 4.41 tpy of particulate matter, without distinguishing whether this particulate matter will be PM10 or the more dangerous PM2.5, risks increasing the local PM2.5 concentration above the primary annual PM2.5 standard by increasing the PM2.5 emissions of the Compressor Station by 49%. EGTS should be required to clarify what portion of its PM emissions from this modification are PM10

versus PM2.5. Without any information to disaggregate whether the particulate matter emitted by the Compressor Station will be PM10 or PM2.5, FERC should conservatively assume that all particulate matter emitted by the Compressor Station is and will be PM2.5 and consider whether these additional emissions will cause an exceedance of the 9 micrograms/cubic meter standard. The application further fails to account for [the production of additional particulate matter](#) from the decay of radioactive [radon gas](#) into radioactive particulate matter in the air, releasing both radiation and an increased quantity of particulate matter. This is an inevitable result of fugitive emissions from natural gas, whether these fugitive emissions arise upstream at the well site or in the midstream processes at a Compressor Station. This results in the application likely underestimating the overall quantity of particulate matter the proposed expansion of the Compressor Station will release. **FERC should therefore deny this permit to prevent an exceedance of the primary annual PM2.5 standard.**³

Aside from acute risks from air pollution, EGTS's application for permission to increase its emission of CO2 equivalent ("CO2e") emissions by approximately 98,500 tpy from its current 30,000 tpy runs afoul of the goals and methods detailed in [Pennsylvania's 2024 Climate Action Plan](#) (the "Climate Action Plan"). The Climate Action Plan forecasts a benefit of \$179 for every metric tonne of CO2e emissions removed from the atmosphere, translating to a \$179 cost for every metric tonne added. This means that the issuance of this permit alone would have a potential cost of approximately \$16 million to the public every single year, including to Pennsylvania's residents. The expansion of compressor station capacity to accommodate more pipelines carrying fracked gas will also accelerate climate change, increasing the indirect cost of

³ See *Venture Global CP2 LNG, LLC Venture Global CP Express, LLC*, 191 FERC 61,153, at P. 22 (2025).

this infrastructure even more at a time when Pennsylvania is already aiming to reduce overall CO₂e emissions by 1.43 Million Metric Tonnes before 2030 and 8.39 Million Metric Tonnes by 2050. For every year that the applied-for compressor is operational, it alone will impede Pennsylvania from reaching its 2030 CO₂e emissions reduction target by approximately 6%. Of course, this estimation is also based on the assertion that the CO₂ emissions factor drawn from the 2015 application by Environmental Resource Management for Atlantic Coast Pipeline, LLC, is accurate and applicable here, which FERC should verify before relying on this calculation. The risks of this counterproductive emissions expansion are not abstract. According to the same Climate Action Plan, these emissions will increase the risk and damage to Pennsylvanians from inland flooding, heat waves, landslides, sinkholes, sea level rise and major river flooding, severe storms, and an overall increase in billion-dollar-cost weather events such as Hurricanes Beryl and Debby in 2024. **FERC should deny this permit in order to avoid impeding the goals of Pennsylvania's Climate Action Plan and prevent irreversible economic and environmental harm relative to the purported benefits of the project.**

EGTS asserts that, in order to comply with regulations on the emissions of carbon monoxide and unburned hydrocarbons, it will install an oxidation catalyst to reduce the emission of carbon monoxide by at least 93% and reduce the emission of unburned hydrocarbons (UHCs) by at least 80%. EGTS is superficially correct that these control efficiencies, if achieved, would result in carbon monoxide and UHC levels consistent with current federal regulations. However, EGTS admits that it does not yet have a finished design for an oxidation catalyst, let alone an actual finished product to test in order to ensure that it will, in fact, reduce carbon monoxide and UHC concentrations by these amounts. EGTS asserts that it is basing the parameters for its

oxidation catalyst on a similar design to an existing oxidation catalyst already in use, but EGTS cannot know that its oxidation catalyst will be similar to an existing design when it has not even completed the design of its oxidation catalyst yet. This assertion by EGTS is purely speculative and FERC has been given no information on the performance of a similar design or how the still not-yet-designed oxidation catalyst will be similar in relevant respects in order to achieve the required control efficiencies.

With respect to the control efficiency of formaldehyde, on August 27, 2025, the DEP received a [response](#) to a deficiency letter by EGTS that claimed that Solar Turbines, a product manufacturer for EGTS, claimed the control efficiency of formaldehyde would exceed 95%. [However, this claim is also not supported by evidence provided by either Solar Industries or EGTS.](#) For each of these control efficiencies, no testing data from actual existing devices proposed to be installed at the JB Tonkin Compressor Station is provided in order to verify that the asserted control efficiencies will be achieved. Instead, EGTS asks the DEP to trust EGTS that future designs that neither FERC nor the DEP can examine at this time will achieve the required control efficiencies. FERC should not merely set compliance with stated emission reduction levels as a “reasonable term[] or condition[]” of a CPCN under 15 U.S.C. § 717f(e), as there is no guarantee that the threat of enforcement actions will result in compliance with emissions level requirements by EGTS. Instead, EGTS may simply regard the cost of enforcement actions as a regular business expense and continue polluting the surrounding air above permitted levels to the detriment of local residents. Instead, FERC should disregard any estimates of emissions that rely on the unproven speculation that EGTS’s emissions controls will achieve at least these 93%, 80%, and 95% reductions in emissions, respectively. FERC should further disregard any

estimates of emissions that rely on the uncited assertion by EGTS that VOC emissions will be conservatively estimated on the assumption that 20% of UHCs are VOCs, given the lack of supporting documentation provided for the assertion that this is a conservative assumption.

FERC should deny this CPCN because there is insufficient information to verify that EGTS will comply with federal Best Available Technology (BAT) limitations on carbon monoxide and UHC, and because EGTS cannot verify the stated control efficiency for formaldehyde.

Because the design of the oxidation catalyst is incomplete, EGTS is further unable to provide any definite information on the maximum pressure drop across the catalyst bed. EGTS again states that it is basing the parameters for the maximum pressure drop on a similar oxidation catalyst design, but EGTS cannot ensure that its oxidation catalyst is similar with respect to maximum pressure drop to an existing design when the relevant design for the oxidation catalyst has not yet been completed. The pressure drop across the catalyst bed significantly impacts the percentage control efficiency of an oxidation catalyst. A high pressure drop can lead to channelling of fluids across the catalyst bed, [concentrated hot spots](#) of fluid that heat the catalyst bed beyond normal operating ranges, and decreases in oxidation catalyst efficiency that result in excess levels of emissions. **FERC should deny this CPCN because, without EGTS providing precise and verifiable data on the maximum pressure drop across its oxidation catalyst, EGTS cannot accurately forecast the emissions from its equipment.**

Taken together, the significant impacts on air quality, human health, and the local and statewide environment from the additions to the JB Tonkin Compressor Station proposed as part of the ARP, in addition to the upstream and downstream GHG impacts of the ARP, require FERC

to conclude after an environmental assessment that a full environmental impact statement is necessary for the ARP.⁴ Any such full environmental impact statement should lead FERC to conclude that the ARP is not in the public convenience and necessity when compared to the diminished public benefit of supplying markets comprised primarily of EGTS’s existing customers already served by the existing EGTS LN-25 and TL-342 pipelines, and where demand growth is merely projected in future years rather than present based on current market conditions.⁵

Impacts from the TL-636 Natural Gas Transmission Line

Based on an environmental justice analysis of populations living within one mile of the proposed TL-636 pipeline route, calculated as one mile from any one of a set of nineteen points laying approximately equidistant along the proposed pipeline route beginning at latitude and longitude approximately (40.42305, -79.59217) and ending at latitude and longitude approximately (40.46247, -79.64040)⁶ and using data from the [Environmental and Residential Population Analysis Multisite tool](#) (“EJAM”), the approximately 3,500 people living within a mile of the proposed TL-636 pipeline already suffer from more particulate matter exposure,

⁴ Although the Council on Environmental Quality (“CEQ”) regulation defining significance in 40 C.F.R. pt. 1508.27 was repealed in March of 2025, 90 FR 11221, “the Commission is fully capable of determining the significance of GHG emissions” and other emissions absent CEQ guidance, and no draft GHG Policy Statement is forthcoming which would counsel in favor of FERC abstaining from this determination. *Gulf South Pipeline Company, LLC*, 181 FERC 61,145 (2022) (Glick, Chairman, and Clements, Commissioner, concurring, at P. 1 n.1); *Venture Global CP2 LNG, LLC Venture Global CP Express, LLC*, 189 FERC 61,148, at PP. 27-29 (2024) (even as the Commission is not required to determine if emissions are “significant” or “insignificant” as a binary, and has so far considered itself unable to evaluate the significance of GHG emissions for their impact on climate change, the Commission still considers these emissions at the EIS stage of NEPA review in order to evaluate their foreseeable impacts on the environment rather than concluding that such emissions would have no significant impact).

⁵ See 88 FERC 61,227, at P. 25.

⁶ The [Clean Water Act Section 401 Application](#) for the TL-636 pipeline lists the starting coordinates for the pipeline as (40.42305, -79.59217) and the ending coordinates as (40.46247, -79.64040). The [csv file used for the EJAM analysis](#) however uses points proceeding from north to south, rather than south to north as used in the Section 401 Application. This change in directionality has no impact on the outcome of the EJAM analysis.

ozone exposure, toxic air releases, proximity to facilities using extremely hazardous materials, and proximity to hazardous waste than the median American.

Summary of Analysis Residents within 1 mile of any of the 19 specified points
Area in Square Miles: 59.69
Population: 3,448

Environmental and Residential Population Indicators

	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA	RATIO TO US AVG	RATIO TO STATE AVG
POLLUTION AND SOURCES							
Particulate Matter (PM 2.5 in ug/m3)	8.47	8.13	72	8.45	61	1.0	1.0
Ozone (ppb)	63.3	59.9	80	61.8	64	1.0	1.1
Nitrogen Dioxide (NO2)	4.8	6.8	18	7.8	21	0.6	0.7
Diesel Particulate Matter (ug/m3)	0.133	0.171	34	0.191	41	0.7	0.8
Toxic Releases to Air	1,400	4,000	39	4,600	65	0.3	0.3
Traffic Proximity and Volume (daily traffic count/distance to road)	290,000	1,400,000	28	1,700,000	30	0.2	0.2
Lead Paint Indicator (% pre-1960s housing)	24.14%	0.48	24	0.3	53	0.8	0.5
Superfund Proximity (site count/km distance)	0.00	0.35	0	0.39	0	0.0	0.0
RMP Proximity (facility count/km distance)	0.54	0.55	56	0.57	65	0.9	1.0
Hazardous Waste Proximity (facility count/km distance)	1.6	2.5	46	3.5	55	0.5	0.7
Underground Storage Tanks (UST) indicator	0.6	3.5	26	3.6	45	0.2	0.2
Wastewater Discharge Indicator (toxicity-weighted concentration/distance)	66	6,400	25	700,000	52	0.0	0.0
Drinking Water Non-Compliance	0.0	1.04	0	2.2	0	0.0	0.0
RESIDENTIAL POPULATION INDICATORS							
Demographic Index USA	0.57	1.14	29	1.34	18	0.4	0.5
Supplemental Demographic Index USA	1.16	1.52	17	1.64	25	0.7	0.7
% Low Income	18%	28%	32	30%	34	0.6	0.7
% in limited English-speaking Households	0%	2%	16	5%	56	0.0	0.1
% Unemployed	5%	6%	41	6%	57	0.8	0.8
% with Less Than High School Education	4%	9%	26	11%	31	0.4	0.5
% under Age 5	3%	5%	32	5%	29	0.5	0.5
% over Age 64	25%	19%	68	18%	80	1.4	1.3
% People of Color	9%	25%	43	40%	19	0.2	0.4

A screenshot of the output of an EJAM analysis of populations living within 1 mile of 19 points along the proposed TL-636 pipeline route

In the absence of underground leak detection, potential leaks from the TL-636 pipeline [could go undetected for a significant period of time](#), posing a greater threat to surrounding populations from explosions and releases into the ambient air over time. This is especially relevant when [measurements of average pipeline leakage rates in pipelines surrounding the Pittsburgh, PA area](#) indicate leakage rates far greater than those assumed by the Environmental Protection Agency (EPA). There is no reason to believe that the TL-636 pipeline in particular will deviate from this pattern of greater-than-assumed leakage rates. These leaks will cumulatively impact [populations in environmental justice areas](#) less than a half mile from the route of the proposed TL-636 pipeline, including a disproportionately high number of elderly residents who will be less able to evacuate in the event of a catastrophic pipeline failure and [whose bodies are more susceptible to respiratory damage](#) from everyday instances of leakage.

These leaks will expose these thousands of local residents to each of the toxic and hazardous contaminants discussed in the above section regarding the JB Tonkin Compressor Station, with all of the resulting negative health impacts already described. The compliance failures of EGTS, described above as well, show the propensity of EGTS to skirt applicable regulations. In the case of an underground pipeline, these failures to comply with regulations will risk even further harm to surrounding residents.

The TL-636 pipeline [will disturb 23 streams, including 18 streams rated as High Quality, as well as 14 wetlands](#). These High Quality streams have at least the quality necessary to support the propagation of fish, shellfish, and wildlife and recreation, as required by 25 Pa. Code § 93.4b(a). This is only a portion of the 26 wetlands and 31 streams within the Project Area of Interest that risk damage in the event of erosion and leaks from the TL-636 pipeline. Some of the

crossings through these wetlands will extend ever further than 200 feet, disturbing not just a small cross-section of wetland resources but a broad swath of wetlands. This level of disturbance suggests at a minimum the need for an alternative pipeline route to avoid disturbing dozens of wetland resources across thousands of feet combined across less than four miles of pipeline. The project will permanently alter a tributary to Turtle Creek in order to construct an access road to a pig launcher/receiver site, and will destroy a palustrine forested wetland by converting it to a palustrine emergent wetland. The placement of the pig launcher itself so close to a stream ensures that when the pig launcher is used for pipeline maintenance [it will release PCBs, VOCs, methane, and ethane into the air](#), where it will contribute to air pollution and pollution of the nearby water in a tributary to Turtle Creek as it interfaces with polluted air.

Looking at the [How's My Waterway](#) EPA database of waterway quality within the Haymaker's Run watershed, waterways impacted by the TL-636 pipeline are already impaired for aquatic life due to poor water quality impacted by sediments (in Steel's Run, various unnamed tributaries to Steel's Run), and sediments as well as acidity (in various unnamed tributaries to Turtle Creek). The particular concern over erosion of soils and sediments from the pipeline construction process casts doubt on the temporary nature of these impacts when eroded soils and sediments will be permanently deposited into these waterways. This cumulative impact on top of existing impairments for sediment risks the long term viability of these streams as continued high quality streams able to support aquatic life and recreation in the case of the non-Turtle Creek streams, and risks degrading the unnamed tributaries to Turtle Creek from perennial or intermittent flow to an ephemeral flow as sediment deposits from erosion caused by

the TL-636 pipeline disturb and alter stream flow. FERC should find that this artificial degradation of stream quality **is not in the public convenience and necessity**.

The US Fish & Wildlife Service (“USFWS”) review of the TL-636 project for impacts to threatened or endangered species indicated that the project may impact the Indiana bat, the northern long-eared bat, the tricolored bat, and the monarch butterfly. Although none of the critical habitats for these species are within the Project area, tree removal even outside of the summer occupancy season for the northern long-eared bat and the tricolored bat will still diminish the available habitat for these species, risking overcrowding and gradual habitat destruction regardless of when tree removal takes place. EGTS consulted with USFWS regarding impacts to the Indiana bat, and was informed that impacts to the Indiana bat would be insignificant. However, EGTS did not discuss or further evaluate any impacts of the project on the monarch butterfly, a proposed threatened species under the Endangered Species Act. This failure to evaluate impacts on monarch butterfly populations, a species that has been [declining in population across Pennsylvania](#) and is [proposed for federal protection by the USFWS](#),⁷ indicates that **the ARP’s TL-636 is not in the public convenience and necessity as it will plausibly threaten monarch butterfly populations**.

FERC should deny a CPCN for the ARP where foreseeable leaks from the ARP will exacerbate air pollution in environmental justice communities, cumulatively impact vulnerable populations, damage and permanently alter the quality of local waters, and increase the risk of a catastrophic failure that could disproportionately endanger elderly residents who are less able to evacuate in the event of an emergency.

⁷ See 89 Fed. Reg. 100662 (Dec. 12, 2024).

Impacts from the Delmont Metering and Regulation Station Upgrades

The Delmont Metering and Regulation Station (“Delmont M&R”), aggregated with the Oakford Compressor Station approximately 150 feet away, is already a major source of air pollutants under the Clean Air Act because of the emission of [nitrogen oxides, carbon monoxide, VOCs, formaldehyde, and overall HAPs](#). The addition of two natural gas-fired small combustion units will add even more emissions to this major source, including 1.22 tpy of nitrogen oxides, 0.64 tpy of VOC, 11.08 tpy of CO, 0.60 tpy of PM10, 0.04 PM of PM2.5, 0.12 tpy of sulphur dioxide, and 13,485.18 tpy of CO2e. Given their quantities, the additional carbon monoxide and CO2e are especially concerning. According to an analysis from the EJAM database of the population surrounding the latitude and longitude (40.4016, -79.5614), these would be added to an area within two miles of the Delmont M&R where nearly 6,000 residents already suffer from above-median exposure to particulate matter, ozone, toxic releases into the air, facilities with extremely hazardous substances, and facilities with hazardous wastes. Predictably, this facility is already located in a [2024 Pennsylvania Environmental Justice Area](#).

Summary of EJ Analysis

Residents within 2 miles of this specified point
Population: 5,982

Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (PM 2.5 in ug/m3)	8.33	8.13	57	8.45	56
Ozone (ppb)	62.8	59.9	71	61.8	61
Nitrogen Dioxide (NO2)	5.4	6.8	32	7.8	27
Diesel Particulate Matter (ug/m3)	0.139	0.171	38	0.191	43
Toxic Releases to Air	1,400	4,600	39	4,600	65
Traffic Proximity and Volume (daily traffic count/distance to road)	340,000	1,400,000	33	1,700,000	33
Lead Paint Indicator (% pre-1960s housing)	0.26	0.48	26	0.3	54
Superfund Proximity (site count/km distance)	0.00	0.35	0	0.39	0
RMP Proximity (facility count/km distance)	0.73	0.55	72	0.57	73
Hazardous Waste Proximity (facility count/km distance)	1.9	2.5	54	3.5	57
Underground Storage Tanks (UST) Indicator	1.0	3.5	43	3.6	52
Wastewater Discharge Indicator (toxicity-weighted concentration/distance)	110	6,400	32	700,000	56
Drinking Water Non-Compliance	0.0	1.04	0	2.2	0
SOCIOECONOMIC INDICATORS					
Demographic Index USA	0.53	1.14	27	1.34	16
Supplemental Demographic Index USA	1.35	1.52	37	1.64	37
% Low Income	18%	28%	37	30%	35
% in limited English-speaking households	0%	2%	66	5%	56
% Unemployed	0%	9%	68	9%	68
% with Less Than High School Education	9%	9%	42	11%	37
% under Age 5	2%	5%	24	5%	23
% over Age 64	31%	19%	88	18%	89
% People of Color	0%	25%	30	40%	14

A screenshot of the output of an EJAM analysis of populations living within 2 miles of the Delmont M&R Station

FERC should especially consider the impacts of increased carbon monoxide and CO2e emissions on the local population, given that much of this population resides in environmental justice areas designated by Pennsylvania. These emissions will cumulatively impact a population that is already exposed to 900.93 tpy of nitrogen oxides, 385.72 tpy of carbon monoxide, 98.49 tpy of VOCs, 42.77 tpy of PM10, 0.77 tpy of sulphur dioxide, 61.63 tpy of HAPs, 35.97 tpy of PM2.5, and 246,310.44 tpy of CO2e from the Oakford Compressor Station alone. This is to say nothing of the emissions from the Rock Springs compressor station, [which is a single facility along with the Oakford Compressor Station](#), because these facilities are less than one-quarter mile apart. Considering in addition the 33.33 tpy of nitrogen oxides, 9.57 tpy of carbon monoxide, 11.69 tpy of VOCs, 0.09 tpy of sulphur oxides, 0.04 tpy of PM2.5 and PM10, and 7.84 tpy of HAPs from the Rock Springs Compressor Station, **FERC should conclude that it is**

not in the public convenience and necessity to increase the enormous cumulative impact of air pollutants on the surrounding community even further.

Notably, the additional heaters at the Delmont M&R will represent a 2.7% increase in carbon monoxide emissions, a 15.6% increase in sulphur dioxide emissions, and a 5.5% increase in CO₂e emissions. The HAPs already emitted by the facility include 41.09 tpy of formaldehyde, 1.95 tpy of benzene, 0.95 tpy of toluene, 0.11 tpy of ethylbenzene, 0.26 tpy of xylene, 0.90 tpy of n-Hexane, 7.68 tpy of Acetylaldehyde, and 7.69 tpy of Acrolein. These measurements do not consider the speciation of HAPs from tank emissions, which could add to these totals if properly speciated in EGTS's calculations. The previously discussed health issues arising from exposure to HAPs and the above-listed pollutants will additionally impose a cumulative impact on the surrounding population, worsening the quality of the air they breathe and endangering their health. **Consideration of the environmental justice impacts of this approval by FERC and provisions for a public scoping meeting are especially important** given that the DEP explicitly did not apply its environmental justice policy to the approval of the small combustion units at the Delmont M&R. Such a public scoping meeting will make clear to FERC why the ARP does not serve the public convenience and necessity.

Impacts of EGTS's Violations of State and Federal Environmental Law

The violations listed in EGTS's AQ GP 5 application are limited to violations of Pennsylvania's Air Pollution Control Act ("APCA") since the previous submission to the DEP by EGTS. In considering the likely environmental impacts from the ARP, FERC should not limit itself to only the most recent APCA violations by EGTS, but should instead consider the entirety of the federal and state law violations history of EGTS, including violations of environmental

statutes other than APCA, many of which implement federal standards under the Clean Air Act and the Clean Water Act. These violations demonstrate the propensity of EGTS to disregard and violate environmental law. Just last year in nearby Hempfield Township, EGTS [attempted to install an unpermitted replacement dehydrator](#) at a compressor station and poured multiple foundations for this project before the violation was discovered by the DEP. The only reasonable interpretation of this action is that it is a deliberate violation of the law, not an accident. Considering an equipment malfunction at the North Summit Station in January of 2025, EGTS was negligent in reporting an equipment malfunction related to a release of fugitive emissions.

Looking at the past five years of operation, in 2022, the Compressor Station [failed a stack test compliance evaluation](#) that compared its measured formaldehyde emissions with its permitted emissions limitations. This suggests that potential emissions were higher than indicated by the relevant permit. In 2021, the JB Tonkin Compressor Station [received a notice of violation](#) during an administrative file review listing the very same type of violation as the one it received only a few months later in 2022. [EGTS received the same type of violation again](#) at another facility just this year. In 2023, EGTS [left a well unplugged so completely](#) that the air within the material around the wellhead was 100% methane, even as EGTS had promised to engage with the government on a solution to this continuously leaking well. This pattern of failures to follow good operating procedures and ensure compliance at the JB Tonkin Compressor Station suggests that, if EGTS is allowed to install yet another piece of high emissions equipment at the Compressor Station, it will again violate the law and exceed emissions limitations that are already approaching major source limits while continuing to claim minor source status. In 2021, [EGTS allowed a malfunctioning gas detector at a compressor](#)

[station to cause an unnecessary emergency shutdown](#) that vented VOCs into the air. In 2022, EGTS [allowed debris to build up in a check valve at another, different compressor station](#) that released VOCs and HAPs into the air. **These violations only emphasize the need for FERC to deny a CPCN in a situation where even the officially reported data from EGTS shows the Compressor Station approaching major source status.**

Alternatives for Meeting Energy Needs

The maximum supply from the ARP is 550,000 Dth/d, approximately 161,150 mWh/d, or approximately 6,715 mW of power. The market study prepared by ICF for the ARP indicates that increasing electrical demand, especially from data centers and other high-tech operations, is driving the increased demand for energy. The proposed alternatives, therefore, assume that the predominant use of the supplied gas will be for generating electrical power, consistent with the ICF report on sectoral gas consumption in the Marcellus and Utica regions by sector. Presuming that the supplied 6,715 mW of power would need to be replaced by an alternative energy source, this could be accomplished through multiple renewable energy options.

For solar installations, [100 sq ft of solar panels can feasibly generate 1 kW of power](#) in utility-scale operations. To provide 6,715 mW of power, utility-scale solar energy would therefore require approximately 24 square miles of solar panels at an up-front cost of approximately 3.35 billion dollars, but with an expected annual profit ranging between 307.2 and 614.4 million dollars, resulting in a forecasted payback period of between approximately 5 and a half years and 11 years for installations with a forecasted lifetime of over 25 years. This payback period will only diminish, and expected annual profits will only increase, as utility-scale solar panel efficiencies increase with new advances in solar cell technology. This alternative method

of supplying power to meet the electrical needs of high-tech power consumers, especially in the rural areas of Southwestern Pennsylvania that contain approximately [1 million acres of farmland with the potential for solar cell placement](#), will forego the significant environmental harms to southwestern Pennsylvania and the broader climate that will result from the use of gas to power significant energy loads in southwestern Pennsylvania. Though 24 square miles of land may appear to be a significant land use, this would represent less than 2% of the agricultural land in the region where solar energy facilities are suitable for siting.

For wind installations, [.3 hectares, or .75 acres of permanently impacted land can feasibly generate 1 mW of power](#), even without considering [advances in turbine efficiency since 2009](#). With these advances considered, to provide 6,715 mW of power, utility-scale wind energy would therefore require approximately 4 square miles of land, with an additional approximately 9.2 square miles of land seeing temporary impacts for construction activity. This would come at a cost of approximately 13 billion dollars, with operational expenses of 289 million dollars per year, but with gross profits of approximately 1.29 billion dollars and net profits of approximately 1 billion dollars [based on the market value of wind in the PJM Interconnect](#). This would result in a forecasted payback period of approximately 13 years for installations with a [forecasted lifetime of approximately 20 years](#). These wind facilities could feasibly be sited along the Appalachian mountains in the Pennsylvania counties of Somerset, Cambria, and Blaire, for example, where significant wind power sources are [already in place](#).

Conclusion and Request for Public Scoping Meeting

After an environmental assessment, FERC should find that the significant impacts of this project on the environment require the preparation of a full environmental impact statement

under NEPA. Following the preparation of such an environmental impact statement, FERC should deny this CPCN. Based on the contents of the permit applications and information provided by EGTS, granting this CPCN would endanger local residents and risk irreversible damage to the local environment in Westmoreland County. Given the significant degree of public interest in this CPCN process indicated by this letter and by the proximity of the ARP infrastructure in Westmoreland County to thousands of local residents, including multiple members of Protect PT, Protect PT requests that the FERC schedule and notify the community of a public scoping meeting in or nearby to Murrysville, PA on FERC's consideration of a CPCN for the ARP. All relevant portions of documents hyperlinked to this document are attached as PDF files for the Commission's convenience.

Sincerely,



Dylan Basescu
Staff Attorney, Protect PT
dylan@protectpt.org
412-254-3494



Gillian Graber
Executive Director, Protect PT
gillian@protectpt.org
724-392-7023