Protect PT

3344 Route 130, PO Box 137
Harrison City, PA 15636

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Sent by Certified Mail and Email

Mark Gorog, Department of Environmental Protection, Bureau of Air Quality Southwest Regional Office Program Manager
400 Waterfront Drive
Pittsburgh, PA 15222

Dear Mr. Gorog,

Protect PT (Penn-Trafford) 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. This letter concerns the Department's consideration of permit no. AG5-65-00018A, Authorization ID 1536323, an Air Quality General Permit 5 for a compressor and associated machinery at the JB Tonkin Compressor Station (the "Compressor Station") in Murrysville, Pennsylvania. On behalf of its members, some of whom reside less than a mile from the Compressor Station and some of whom send their children to the Franklin Regional Primary School, and the teachers, staff, and approximate 695 children who attend Franklin Regional Primary School, Protect PT asks that the Department deny this permit to prevent public health impacts via exposure to dangerous and hazardous air emissions.

Based on the permit application by Eastern Gas Trans & Storage Inc ("EGTS"), granting this permit would violate the Air Pollution Control Act ("APCA"), violate the constitutional rights of Pennsylvanians, and result in an unreasonable degradation, diminution, and destruction of Pennsylvania's natural environment and airborne resources.

To summarize, the permit 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, hazardous air pollutants (HAPs) by 18% to 14.19 tpy, and ***CO2 equivalent emissions by 328%*** to 128,495.79 tpy. This is despite the Department's decision to downgrade the Compressor Station from a major source of air pollutants to a minor source of air pollutants in 2022. That decision ignored failures to comply with emission testing standards at the Compressor Station that indicated asserted emissions levels could be lower than actual potential levels of air pollutant emissions. Though this testing failure was detailed in a 2022 comment by the Clean Air Council (CAC), the Department did not heed the CAC's warning at the time. The Department has another opportunity now to fix its mistake and prevent a radical increase in air pollution in Westmoreland County.

These 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, incorporated under 25 Pa. Code § 121.1 (defining "Title V facility"). 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, the Department should deny this permit because the application does not include up-to-date and reliable testing of current overall potential emissions, including fugitive emissions, from the Compressor Station.

The Compressor Station has a long recorded history of fugitive emissions, including 11 sources of fugitive methane emissions found by the Department in 2019 after community members reported unpermitted, odorous emissions from the Compressor Station. This is consistent with a 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 Compressor Station further undermine EGTS's promise that the new compressor infrastructure will not produce odorous emissions beyond the property line. These odors, the added noise from the proposed additional compressor engine, and the additional required lighting at the facility will all contribute to an even more severe and unlawful nuisance created by the 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 Compressor Station. The Department 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 Compressor Station a major source. Given only this information, the Department should exercise prudence and err on the side of protecting the public from fugitive emissions and related nuisances by denying this permit application.

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 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 permit 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 application, the facility-wide emissions were taken from Section C, Condition No. 008 of 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 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, the Department has a duty to deny this permit until 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 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 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, including at least four members of Protect PT, 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 enough to unreasonably degrade it in violation of their environmental rights under Article I, Section 27 of the Pennsylvania Constitution.

On the topic of exposures to particulate matter, the ambient particulate matter exposure of residents in the two miles surrounding the 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%. Without any information to disaggregate whether the particulate matter emitted by the Compressor Station will be PM10 or PM2.5, the Department should conservatively assume that all particulate matter emitted by the Compressor Station is and will be PM2.5.

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. The Department should therefore deny this permit to prevent an exceedance of the primary annual PM2.5 standard.

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 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. Every year prior to 2030 alone that the applied-for compressor is operational, it alone will impede Pennsylvania from reaching its CO2e emissions reductions 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 are accurate and applicable here, which the Department 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. The Department should deny this permit in order to implement 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 the Department is given no information on the performance of this 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 Department 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 Compressor Station is provided in order to verify that the asserted control efficiencies will be achieved. Instead, EGTS asks the Department to trust EGTS that future designs that the Department cannot examine at this time will achieve the required control efficiencies. The Department should not merely set compliance with these emission reduction levels as a condition of a granted permit, 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 associated fines as a regular business expense and continue polluting the surrounding air above permitted levels to the detriment of local residents. Instead, The Department 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. The Department 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. The Department should deny this application for providing insufficient information to verify that EGTS will comply with federal Best Available Technology (BAT) limitations on carbon monoxide and UHC, and for failing to 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 to the Department 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 because 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 ultimately decreases in oxidation catalyst efficiency that result in excess levels of emissions compared to projections

based on ideal control efficiencies. The Department should deny this permit 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.

On the subject of the violations acknowledged by EGTS, the violations in the permit application are limited to violations of the APCA since the previous submission by EGTS. The Department should not limit itself to only the most recent APCA violations by EGTS, but should instead consider the entirety of the violations history of EGTS, including violations of environmental statutes other than APCA. 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 Department. The only reasonable interpretation of this action is that it is a deliberate violation of the law, not an accident. Considering the 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 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. This pattern of failures to follow good operating procedures and ensure compliance at the 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. These violations only emphasize the need for the Department to deny this permit in a situation where even the officially reported data from EGTS shows the Compressor Station approaching major source status.

As a minor note, on Page 18 of Form 2700-PM-BAQ0267, EGTS notes that there are two "other" applicable federal regulations not listed on the Form, including 40 CFR Part 60, Subpart OOOOb. However, EGTS does not specify what the second additional federal regulation is. The Department should compel EGTS to clarify what this additional "other" regulation is and detail EGTS's steps for demonstrating compliance with this additional regulation before making any decision on whether to issue or deny this permit.

Because the Department has a duty to protect the environmental rights, health, and safety of all Pennsylvanians, the Department should deny this permit. Based on the contents of the permit application and the responses of Eastern Gas Trans & Storage Inc ("EGTS") to the Department's deficiency letters, granting this permit would violate the law, endanger local residents, and risk irreversible damage to the local environment in Westmoreland County and across Pennsylvania. Given the significant degree of public interest in this permit indicated by this letter and by the proximity of the Compressor Station to thousands of local residents, including multiple members of Protect PT, Protect PT requests that the

Department schedule and notify the community of a public hearing in Murrysville, PA on the Department's consideration of the permit.

Thank you for your consideration of these requests. You may contact Protect PT by email at dylan@protectpt.org or by phone at 412-254-3494 if you have any questions, responses, or concerns with regard to this letter.

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