

Commenting Tips for Spectra's Air Quality Permit Application

The Massachusetts Department of Environmental Protection (MassDEP/DEP) is reviewing Spectra's Air Quality Plan and they are **accepting public comments until May 1**. We encourage folks to submit comments either by mail or email. We understand that much of the information in these documents can be difficult to sort through and requires a lot of time. To help make the commenting process easier, we've tried summarized some of our findings.

Below are some suggested comments that you are welcome to use as you write your public comment.

Comments can be mailed to:

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MassDEP Southeast Regional Office
20 Riverside Drive, Lakeville, MA 02347*

Or emailed to: thomas.cushing@state.ma.us

Suggested Commenting Points

1. Missing sources of pollution

- Multiple sources of emissions were not measured or monitored because regulations exempt them for tracking and control. These fugitive* emissions add up to a significant source of pollution impacting the Fore River basin. Not acknowledging their presence is misleading.
- Some sources of pollution that were not accounted for:
 - Pollution from ships coming into the Fore River
 - The venting of the sewer pump station and the emissions from deliverables to Clean Harbors from many truck deliveries and transfers of products to multiple tanks.
 - Off-loading of products from ships and the breathing from the storage tanks.
 - Continuous petroleum truck loading from the multiple oil and gasoline tanks generate vapor release.
 - The MWRA sludge plant bakes dewatered sewage sludge generating odors and compounds into the vicinity.
 - Twin Rivers processes fatty acids into a component of biofuel and stores the product in tanks and then transfers it to railroad tank cars for transfer off site as well as receiving deliveries of material to be processed at the plant by ship (palm oil) and by truck.
 - The power plant stores oil as a backup fuel ; gas is released from the tank as a result of the tank breathing
 - Pollution from the twenty thousand cars day that travel over the bridge every day.
 - Off-loading of road salt by ship at Cashman' property and other activities by Quirk that generate emissions that are not measured by permits.
 - **Fugitive emissions: the release of gases/vapors from pressurized tanks; unintended leaks; irregular release of gases due to industrial activities (source: Wikipedia)*

2. Concerns about existing levels of pollution

- Levels of benzene already exceed the DEP's Ambient Air Limits (AALs) in the greater Boston area.
 - The Citgo oil tank farm in Braintree releases a significant amount of benzene and is located w/in 1 mile of the proposed site. According to data from the EPA's Toxics Release Inventory, Citgo released 576 pounds of benzene into the air in 2015.
 - The most recent EPA National Air Toxics Analysis (NATA) demonstrates that local benzene levels are high enough to increase local cancer risks.

3. Further Testing Needed

- The DEP should request the Applicant provide dispersion modeling of hazardous air pollutants HAPs that incorporates ambient and local source data (i.e. ambient benzene levels near Citgo).
- The DEP should conduct independent testing for formaldehyde in and around the proposed facility location, if they do not already collect these data.
- Data on hazardous and radioactive pollutants needs to be addressed
 - Both the permit and the application do not address the presence of radon, heavy metals, and radioactive lead in natural gas and natural gas infrastructure.
 - The DEP should require the applicant to provide test results for these hazardous pollutants, and the permit application should be amended with an analysis of the impacts of these releases prior to its approval