

COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT
STATE HOUSE, BOSTON 02133-1053

April 24, 2017

Thomas Cushing, Permits Chief
MassDEP Southeast Regional Office
20 Riverside Drive
Lakeville, MA 02347

Dear Mr. Cushing:

We write in strong opposition to the issuance of the Proposed Air Quality Plan Approval to Algonquin Gas Transmission, LLC's non-Major Comprehensive Plan Application. This approved permit would advance the plan to construct a natural gas compressor station in the Town of Weymouth as a component of the Atlantic Bridge project. The plan to build a compressor station in this location is inherently flawed not only because of inadequate siting standards, but also due to the extreme health and safety risks that are now being imposed on the community.

As you know, the proposed site of the compressor station is a small peninsula bordered by the Fore River, Kings Cove, and densely populated North Weymouth and Quincy neighborhoods. The Fore River Basin is overloaded with an abundance of industry, including the natural gas-fired Fore River Energy Center, which is already polluting the local air in the Quincy, Weymouth, and Braintree regions. The site is within one half-mile of over 960 homes, 38 educational facilities, a water treatment plant, and a public park. An estimated 3,100 children live within one mile of the proposed site and 13,200 children attend school within three miles of the location. The Wessagusset and Snug Harbor Elementary Schools are the two educational facilities located closest to the Fore River, and have already been found to have statistically significantly higher rates of asthma than the state average.¹

Existing compressor stations are known to create excessive noise and odor, due in part PM2.5 emissions including Ethylbenzene, Butane, and Hexane,² which are known contributors to childhood autism.³ A report issued by Algonquin's parent-corporation, Spectra Energy, reveals that at least ten carcinogenic chemicals will be emitted from the compressor station.⁴ According to 310 CMR 7.02(5)(c) of the Comprehensive Plan Requirements, "[a]dditional information shall be furnished upon request by the Department including, but not limited to, air dispersion modeling, additional plans or specifications and documentation or evidence to support the application." As it stands, air dispersion modeling cannot be accurately acquired from the Fore River Basin because its assigned air monitors are located at least eleven miles away.⁵ The spatial separation between the site and monitoring devices increases the probability that any readings will be diluted and inaccurate. This has already been proven through the

¹ Massachusetts Department of Public Health. *Pediatric Asthma in Massachusetts 2008-2009*. 2012.

² Southwest Pennsylvania Environmental Health Project. *Summary on Compressor Stations and Health Impacts*. 2015.

³ International Society for Environmental Epidemiology. *Exposure to Particulate Matter Air Pollution during Pregnancy Is Associated With Increased Risk for Autism Spectrum Disorder*. *Environmental Health Perspectives*, 2013.

⁴ Trinity Consultants. "Non-Major Comprehensive Plan Approval Permit Application – Transmittal No. X266786". Page 3-3. January 2017.

⁵ Massachusetts Department of Environmental Protection. *Massachusetts 2015 Air Quality Report*. 2016.

Comprehensive Permit Application process, when the Hazardous Air Pollutant modeling failed to account for preexisting background pollution including benzene.⁶

The Massachusetts Department of Environmental Protection has a legal responsibility under the Global Warming Solutions Act of 2008 to investigate and protect residents of the Commonwealth and our natural surroundings from projects that would contribute to climate change processes. Section 7 of the Act explicitly addresses the issue at hand, ordering that “[i]n considering and issuing permits, licenses and other administrative proposals and decisions, the respective agency, department, board, commission or authority shall also consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions”. According to the aforementioned report by Spectra Energy, at least 41 tons of greenhouse gases will be emitted from the compressor station every year.

Confirming this application will not only neglect the laws set forth in the Global Warming Solutions Act, it will also put Weymouth and its surrounding communities at a greater risk of breaking compliance with National Air Quality Standards. After a recent recommitment to the Act by way of Executive Order, as well as a Supreme Judicial Court ruling to reinforce adherence to the Act, it would be both counterproductive and injudicious for the Department to confirm the issuance of the Proposed Plan Approval to Algonquin. More importantly, consenting to the construction of the compressor station will be doing a severe injustice to the residents who live in immediate and surrounding areas by sharply increasing health risks, jeopardizing their property values, damaging their local economies, and sustaining a perpetual threat to their lives.

We are grateful for this opportunity to comment on this pending project that affects our communities. However, it is our hope that this opportunity does not prove to be fruitless and that the scientific and circumstantial evidence provided in our testimonies will not be ignored. We thank you in advance for your time and consideration of this important request. Please do not hesitate to contact us directly with any questions or concerns.

Sincerely,



Patrick M. O'Connor
State Senator
Plymouth & Norfolk District



John F. Keenan
State Senator
Norfolk & Plymouth District

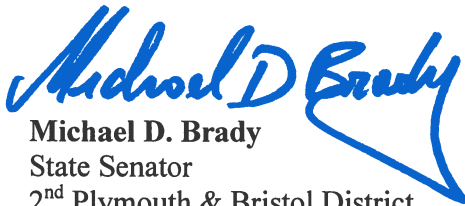


Ronald Mariano
House Majority Leader
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James M. Murphy
State Representative
4th Norfolk District


⁶ United States Environmental Protection Agency. *Form R Reports, Part II. Chemical – Specific Information, Document Control Number 1315213793488*. 2015.




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