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September 17, 2020

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Algonquin Gas Transmission, LLC, Atlantic Bridge project, Docket No. CP16-9-000,

Request to FERC to Halt Construction, Order Additional Health Impacts Review

Dear Secretary Bose,

Food & Water Watch, joined by Greater Boston Physicians for Social Responsibility, Climate Code Blue, and Fore River Residents Against the Compressor Station with their counsel, Michael Hayden, collectively request that the Federal Energy Regulatory Commission (FERC) rescind the November 27, 2019 Notice to Proceed with construction for Enbridge's Atlantic Bridge project, in light of numerous recent developments that demonstrate the developer's inability to comply with Certificate and state permit requirements as well as the inadequacy of the health impact assessments upon which this project's Certificate were predicated.

At approximately 9 A.M. on September 11, 2020, a gasket failed on the sump tank of one of the inlet filter separators being tested by Enbridge, resulting in line pressure gas venting at ground level into the surrounding community. Enbridge has reported to the Massachusetts Dept. of Environmental Protection (MDEP) that this leak resulted in 265,000 scf of gas and 35 pounds of Volatile Organic Compounds (VOCs) seeping into the surrounding community's ground-level air.

The most recent version of the MDEP air permit (May 2018) lists the maximum natural gas release rate as 20,000 scf per hour. Per the Sept 3, 2020 Enbridge notification concerning their planned Emergency Shutdown test, this project would have released gas at a rate of 1,590,000 scf/hour. This has potential implications for safety and public health; as such, FERC must halt construction and operation until the public can be fully appraised of why there is such a substantial discrepancy between the application and the actual operation of the facility.

Based upon the average hourly composition of natural gas provided by Enbridge for this project's May 2018 MDEP air permit application update, the amount of VOCs released in a 265,000 scf emergency shutdown event would be 264 pounds; not the 35 pounds reported. Since these simple calculations are based solely upon data provided by Algonquin, they and MassDEP need to clarify why the quantities of VOCs Enbridge

claims are released with a 200,000-265,000 scf gas release are an order of magnitude smaller than what would be expected from their application. Such a discrepancy demonstrates that the premises upon which this Commission issued its Certificate are fundamentally faulty and require more thorough review and analysis. FERC's Certificate is premised upon a project developer obtaining valid permits from state regulators and such a glaring deficiency of said permits requires FERC to suspend this Project's construction and Certificate until all discrepancies can be fully addressed.

Moreover, Enbridge quite clearly stated, in all of their various applications, that the Fore River Basin was a High Consequence Area due to tightly packed residences mixed with other explosive and toxic industry. The public safety concerns here are further exacerbated by an independent audit of the health impact assessment upon which this project's air permit is premised.¹ Independent review has found that the air permit upon which this Project's FERC certificate is conditioned has severe scoping limitations resulting in an inadequate scope of review for health impacts. Moreover, the air permit failed to meaningfully look at the cumulative pollutant exposures presented by the surrounding sources within the project area and how those cumulative emissions may impact the area's environmental justice communities.

Given the discrepancies between projected and observed emission rates, as well as the inadequacy of air permits upon which FERC's Certificate is conditioned, it is of the utmost importance that the Commission rescind this project's Notice to Proceed with Construction until this Enbridge can fully comply with all the legal requirements of its FERC Certificate. For all these reasons, we respectfully request that FERC rescind the NTP, or suspend it until the MDEP has reissued its air permit to reflect changed understanding of observed air emissions.

Respectfully submitted,

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¹ <https://foreriverhia.com/>

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