State of New Jersey
Department of Environmental Protection
Air, Energy and Materials Sustainability
401 East State Street
P.O. Box 420, Mail Code 401-02
Trenton, NJ 08625-0420
Tel. (609) 292-2795 • Fax (609) 777-1330
www.nj.gov/dep

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

SHAWN M. LATOURETTE
Commissioner

PAUL BALDAUF
Asst. Commissioner

HEARING OFFICER'S REPORT

Response to Public Comments

FOR

Tennessee Gas Pipeline Company

164 Libertyville Rd. (County Rt. 650)
(SUSSEX COUNTY), NEW JERSEY, 07461

Program Interest (PI) Number: 83405 Permit Activity Number: BOP190001

AIR POLLUTION CONTROL OPERATING PERMIT (TITLE V)

Hearing Officer

Danny Wong

Danny Wong Date 1/19/2023

HEARING OFFICER'S REPORT

List of Commenters (in the order of appearance at August 4, 2022 public hearing):

No.	Name	Association
1.	Michael J. Stiles[1]	Business Manager of Pipefitter's Local 274
2.	Ed Driscoll	Member of Pipefitter's Local 274
3.	Paula Rogovin[1]	Member of Don't Gas the Meadowlands Coalition
4.	Jeff Rapaport	Resident
5.	Ciro Scalera[1]	Director of Public Affairs for NJ Laborer's Union
6.	William Rodendough	Resident
7.	Jason Grablutz	Member of NJ Laborer's Union
8.	Tom Conway[1]	Resident & Chairperson, Ringwood Environmental Commission
9.	John Rocco	Representative of Operating Engineers of Local Local 825, Member of Morris Sussex County Building Trade, & Director of Sussex County Building Trades.
10.	Michael Kubicka	Member of Local 25 & Resident
11.	Drew Dipalma	Member of Local 825 & Resident
12.	Nick Civitan	Member of Local 825 & Resident
13.	Bucky Rocco	Member of Local 825
14.	Carolyn Jackson[1]	Resident
15.	Brian Scanlan[1]	Resident
16.	Brienne Stevenson	Resident
17.	Jared Coffin	Resident
18.	Ted Glick	Resident
19.	Elliott Ruga[1]	Policy and Communications Director with NJ Highlands Coalition
20.	Lee Ziesche	Documentary Film maker from New York City
21.	Neil Sauerwein	Resident
22.	Jane Califf	Member of 350 NJ Rockland County
23.	Pranite Bijlani[1]	Resident
24.	Carol Gay	President of the New Jersey State Industrial Union Council
25.	Ruth Neustadter	Resident
26.	Erica Panek	Resident
27.	Kelly Kessler / Jeff Keida	Residents
28.	Kimberly Noel	Resident
29.	Annica Noel	Resident
30.	Greg Gorman	Representative of New Jersey Sierra Club
31.	Owl	Resident
32.	Tanja Israel	Resident
33.	Melissa Brown Blaeuer	Resident
34.	Christine Clarke[1]	Resident
35.	Karl Stehle	Resident

36.	Renee Allessio[1]	Resident
37.	Jennifer O'Hagan	Resident
38.	Fred Potter	Member of Local 469
39.	Julie Otto[1]	Resident
40.	Norma Jean Martine	Resident
41.	Skyler Sumner	Resident
42.	Fred Mendez	Resident
43.	Jill Aquino[1]	Resident
44.	Sam DiFalco[1]	Representative of the Food and Water Watch
45.	Robert Madison	Resident
46.	Curtiss Wells	Representative of Local 469
47.	Kathy Ebbinkhuysen	Resident
48.	Margaret Wood[1]	Resident
49.	Unidentified Speaker	
50.	Phillip Tintle	Resident
51.	Jamie Parlgreco	Resident
52.	Liz Cieri	Resident

Commenters noted with the superscript [1] also submitted written comments to the New Jersey Department of Environmental Protection (NJDEP).

List of Additional Commenter(s) from whom written comments were received:

1.	Rachel Sellen	Resident, Representative of 70 Health Professionals
2.	Taylor McFarland	Conservation Program Manager, New Jersey Sierra Club
3.	Robert Calafiore	Resident
4.	Lisa Reider	Editor of Sussex County Newspapers
5.	Marie Curtis	Resident
6.	Stephen Marshall	Resident
7.	Kristin Evans	Resident
8.	Kathryn Hjelle	Resident
9.	Jonathan Salazar	Resident
10.	Morgan Spicer	Resident
11.	Teresa Brown	Resident
12.	David Lawrence	Resident
13.	Rose Reina-Rosenbaum	Resident
14.	Christine Dunbar	Resident
15.	Allison Orsi	Resident
16.	Ken Dolsky	Resident
17.	John Kessler	Resident
18.	Charles Burgi	Resident

19.	Amy Goff	Resident
20.	Daniela Gioseffi	Resident
21.	Bonnie Kessler	Resident
22.	Janice Cooper	Resident
23.	Temma Fishman	Resident
24.	Ann Kelly	Resident
25.	Ryan Stauss	Resident
26.	Linda Powell	Resident
27.	Eberhard Dieterich	Resident
28.	Marylin Rye	Resident
29.	Keith Voos	Chair, Health, Education, Energy and Pollution Subcommittee of the Environmental and Climate Justice Committee of the NJ State Conference, NAACP; and Chair, Environmental Justice Committee of the Metuchen-Edison-Piscataway Branch, NAACP
30.	Mary Ellen Teshima	Resident
31.	Food and Water Watch (F&WW)	Collection of 769 Public Comments from 524 Individuals
32.	Michael McCawley	Associate Professor in the School of Public Health at West Virginia University
33.	Eric Israel	Resident
34.	Kirk Frost	Resident
35.	Anjuli Ramos	Director, New Jersey Sierra Club
36.	Borough of Alpine	
37.	Township Council Bloomfield	
38.	Borough of Hamburg	
39.	Montauge Township	
40.	Borough of Ringwood	
41.	Borough of Somerset	
42.	Township of Vernon	
43.	Wantage Township	

Individuals who contributed to Food and Water Watch collection of comments:

	First name or Initial	Last name or Initial
1	B.	A.
2	Bharat	Adarkar
3	Michael	Adas
4	Raghav	Akula
5	Pauline	Alama

6	Johan	Andrade
7	JL	Angell
8	Gloria	Antaramian
9	Judith	Arnold
10	Elise	Aronov
11	Alice	Artzt
12	Arlene	Aughey
13	Bella D.	August
14	Elizabeth	Bain
15	Renee	Bain
16	Pat	Balko
17	Elizabeth	Banwell
18	Esther	Barcun
19	Lee	Barile
20	Pamela	Barroway
21	L.	Bartkowski
22	Frank	Battersby
23	Bonnie	Bayardi
24	Renee	Becker
25	Delaney	Beecher
26	David	Bendich
27	Marilynn	Benim
28	Robin Rose	Bennett
29	Nick	Berezansky
30	Edna	Berkovits
31	Maureen	Berman
32	Bette	Bigonzi
33	Eileen	Bird
34	Cori	Bishop
35	Emily	Bittner
36	Roberta	Blitz
37	John	Blundo Jr
38	Leslie	Boen
39	Diana	Bohn

40	Ruth	Boice
41	Margaret	Bonaccorsi
42	Diane	Bonanno
43	George	Bourlotos
44	Jennifer	Brady
45	Faith	Brancato
46	Daniel	Brennan
47	Marinus	Broekman
48	Damon	Brown
49	Scott	Bruinooge
50	David	Bryan
51	Emily	Bryan
52	Janet	Bryan
53	Steven J.	Bryan, Esq.
54	Terese	Buchanan
55	Anne Marie	Bucher
56	Florence	Buckley
57	Barbara	Burke
58	Paula	Bushkoff
59	Jane	Califf
60	Sharon	Callahan
61	Jacqueline	Callas
62	Joshua	Camden
63	Allan	Campbell
64	Cathy	Campbell
65	Tracy	Carcione
66	Lauren	Carlton
67	Carol	Carmon
68	Jim	Carnal
69	Nadja	Carneol
70	Jessica	Caron
71	Siobhan	Carroll
72	Leslie	Carson
73	Sandra	Carstensen

74	Eldon	Carvey
75	Elise	Castner
76	Gus	Castro
77	Katherine	Castro
78	Michael	Cecchini
79	Grace	Chen
80	Robin	Chernoff
81	Nancy	Chismar
82	Consuelo	Chronis
83	Thomas	Cierech
84	Mary	Ciuffitelli
85	Maureen	Clark
86	Morgan	Clark
87	Susan	Clark
88	Christine	Clarke
89	Mark Alan	Cleaveland
90	Jessica	Clingman
91	Leslie	Cohen
92	Kat	Comer
93	Kathleen	Comer
94	Maria	Concilio
95	Annette	Coomber
96	Janice	Cooper
97	David	Copperman
98	M. Rute	Correia
99	Holly	Cox
100	Barbara	Coy
101	Thomas	Cozza
102	Chaz	Cronauer
103	Joyce	Cuomo
104	Eileen	Curran
105	Suzanne	Curry
106	Marie	Curtis
107	John	Dagostino

108	Kenneth	Dahse
109	Emma	Dale
110	Marie	DAnna
111	Beth	Darlington
112	Donna	Davies
113	Rachel	Davis
114	Ron	De Stefano
115	Chris	Deczynski
116	Rosemary	Deflorio
117	Linda	DeLap
118	Glenn	DeLuca
119	Teri	DeMaio
120	Carol	Devoss
121	Karen	Diehl
122	Eberhard	Dieterich
123	Kerstin & Eberhard	Dieterich
124	Sam	DiFalco
125	Janice	Dlugosz
126	Merelyn	Dolins
127	David	Domier
128	Jo Ann	Doran
129	Elizabeth	Doughty
130	Jennifer	Downing
131	Jacquelyn	Drechsler
132	Cheryl	Dzubak
133	Allison	E Orsi
134	Susan	Eckstein
135	Dominique	Edmondson
136	Jane	Egan
137	Rusty	Eidmann-Hicks
138	Stanley	Enzweiler
139	Marilyn	Eppolite
140	Robert	Erickson
141	Tim	Estrada

142	Kent	Fairfield
143	Fred	Fall
144	Susan	Felsen
145	Glenn	Fennimore
146	Steven	Fenster
147	Frank	Fewkes
148	Nannette	Finkel
149	Temma	Fishman
150	John	Fitzgerald
151	Leona and George	Fluck
152	Robert	Focht
153	Nancy	Foster
154	Tracy	Foster
155	John	Fowler
156	Trevanne	Foxton
157	Jayn	Foy
158	Susan	Freel
159	Alice	Freund
160	Gloria	Friedman
161	Denise	Frullo
162	Sharon	Furlong
163	Sherrill	Futrell
164	Martha	Gallahue
165	Kathleen	Galligan
166	Croitiene	GanMoryn
167	Sandra	Garcia
168	Phyllis	Garr
169	Eric	Gaskill
170	Carol	Gay
171	Anne	Gelman
172	Debra	Gemind
173	Robert	Giaquinta
174	Maria	Giffen-Castro
175	Nicole	Gillespy

176	Phyllis	Ginsberg
177	Prof. D. Daniela	Gioaffi
178	Tony	Giordano
179	Dorothy Daniela	Gioseffi
180	Matthew	Glassman
181	Ted	Glick
182	Aileen	Glynn
183	Amy	Goff
184	Caitlin	Gold
185	Jeanne	Golden
186	Susan	Golden
187	Joyce	Goldsmith
188	Steve	Golin
189	Gail	Gordon
190	Greg	Gorman
191	Peter	Gotlieb
192	Stacy	Goto
193	Jeanne	Goyette
194	Catherine	Grano
195	Judith	Green
196	Bert	Greenberg
197	Jackie	Griffeth
198	Nancy	Griffeth
199	Diane	Grohn
200	Joanne	Grossi
201	Ann	Guarino
202	Nicole	Guerrieri
203	Marta	Guttenberg
204	Florence	Hadnot
205	Tarah	Haedo
206	Michael	Halloran
207	Stephen	Halpern
208	Kenneth	Hammond
209	Susan	Hansbury

210	Lori	Hartley
211	Bill	Haudek
212	Chris	Hazynski
213	Kerry	Heck
214	Bonnie	Helmer
215	Nicole	Henderson
216	Brenda	Hennessey
217	Mark	Hennessey
218	Denise	Herrington
219	Marie	Herron
220	Sean	Hickey
221	Lori	Highfield
222	Patricia	Hilliard
223	Thomas	Hills
224	Zachary	Hober
225	Diane	Hoffman
226	Nicholas	Homyak
227	Jamie	Hood-Speight
228	Martin	Horwitz
229	Jennifer	Hsu
230	Louis	Hsu
231	Rebecca	Hughes
232	Debra	Hull
233	Raymond	Intemann
234	Takako	Ishii Kiefer
235	Eric	Israel
236	Tanja	Israel
237	Carolyn	Jackson
238	Shannon	Jacobs
239	Carolyn	Jacoby
240	Anna	Jacus
241	Lori Jo	Jamieson
242	Deborah	Jenkins Braconi
243	Carolyn	Johnson

244	Joyce	Johnson
245	Kenneth W	Johnson
246	Richard	Johnson
247	Rev. Karen G	Johnston
248	Nancy	Jones
249	Stephanie	Judson
250	Richard	Kalish
251	Joyce	Kalison
252	Caroline	Kane
253	Leah	Kane
254	Pamela	Kane
255	Freda	Karpf
256	Tracey	Katsouros
257	James	Keats
258	Jeffrey	Keida
259	Ann	Kelly
260	Barbara	Kelly
261	Patricia	Kelly
262	Kathryn B	Kelly Herkert
263	Stu	Kennedy
264	Bonnie	Kessler
265	John	Kessler
266	Kelly	Kessler
267	Kevin	Kimmel
268	Jamie	Klenetsky Fay
269	Margaret	Kling
270	Dennis	Knaack
271	Walter	Korfmacher
272	Laurel	Kornfeld
273	Patricia	Kortjohn
274	Jennifer	Kosakowski
275	S.	Kovacs
276	Mark	Krasovic
277	Greg	Krawczyk

278	Jo-Ann	Krietzberg
279	Diane	Kuenstler
280	Daniel	Kurz
281	Judy	Kushner
282	Gretchen	Laauwe
283	Liana	Lang
284	Leslie	Lanphear
285	Lorraine	LaShell
286	Vera	Lazar
287	Anna	Lee
288	Jaewoo	Lee
289	Marie	Leithauser
290	Joel	Leitner
291	Cindy	Lenhoff
292	Veronica	Leone
293	Elizabeth	Lerma
294	Ryan	Levens
295	Carol	Levin
296	Shawn	Liddick
297	Lynsy	London
298	Colleen	Loughran
299	Arline	Lowe
300	Thalia	Lubin
301	John	Lynn
302	Denise	Lytle
303	Una	Mac Coille
304	Michael	Madden
305	Sid	Madison
306	Sue	Madison
307	Bambi	Magie
308	Kathleen	Maher
309	Eileen	Mahood-Jose
310	Sally	Malanga
311	Ann	Malyon

312	Marilyn	Manganello
313	Linda	Marks
314	Jessica	Marrotte
315	Stephen	Marshall
316	Donna	Martin
317	Michael	Martin
318	Olivia	Martindale
319	Linda	Maslanko
320	John	Massaro
321	Sheila	Mazar
322	Kelly	McBride
323	Timothy	Mcbride
324	Danelle	McCarthy
325	Kimberly	McClachrie
326	Taylor	McFarland
327	Carolyn	McGrath
328	Karen	McGuinness
329	Jenna	McGuire
330	Molly	McKaughan
331	Caephren	McKenna
332	Linda	McKillip
333	Eileen	McMenamin
334	Michael	Megnin
335	Judith	Mender
336	Kenny	Mercado Sr
337	Shell	Michele
338	Susan	Mikaitis
339	Barbara	Miller
340	Marilyn	Miller
341	Sophia	Milone
342	J. J.	Mistretta
343	Robert	Moore
344	Mon	Mor
345	Bert	Morris

346	Jon	Moscow
347	Patrick	Mulligan
348	Susan	Mullins
349	Brigid	Mulroe
350	Vivian	Murray
351	Jeanette	Myers
352	Kimberly	Myers
353	Nikki	Nafziger
354	Utkarsh	Nath
355	Elizabeth	Ndoye
356	Shlomo	Nessim
357	Ruth Bauer	Neustadter
358	Jennifer	Nielsen
359	Susan	Nierenberg
360	Bill	Nierstedt
361	Donna	Nina
362	Edward	Norkus
363	Christian	Nowell
364	Charles	Nunzio
365	Michele	Ochsner
366	John	Oda
367	Jennifer	O'Hagan
368	Doug	O'Malley
369	Shoshana	Osofsky
370	Irene	Osten
371	Alice	Owen
372	Dogan	Ozkan
373	Patricia	Palermo
374	Marco	Palladino
375	Sharon	Paltin
376	Joanne	Pannone
377	Morgan	Park
378	Mary	Paterson
379	Brian	Peng

380	Noreen	Pereira
381	Brooke	Perry
382	Karen	Phelan
383	Justin	Philipps
384	Alice	Piatek
385	Nancy	Picillo
386	Joseph	Ponisciak
387	Maureen	Porcelli
388	Anne	Powley
389	Angele	Price
390	Jim	Price
391	Rita	Raftery
392	Joann	Ramos
393	Steve	Ramshur
394	Eve	Rantzer
395	Mark	Reback
396	Edward	Reichman
397	Rose	Reina Rosenbaum
398	Gayle	Rembold Furbert
399	Bruce	Revesz
400	Charles	Rinear
401	Kathryn	Riss
402	Victor	Rivera
403	Inga	Robbins
404	Amy	Roberts
405	Paula	Rogovin
406	Pat	Rolston
407	Lisa	Rose
408	Joanne	Rosenberg
409	Linda	Rossin
410	Sharon	Rothe
411	Sharon	Rothman
412	Linda	Rubiano
413	Nicole	Rudick

414	Lisa	Ruffman-Weiss
415	Patricia	Ruggles
416	Brian	Russo
417	Rodney	Ruth
418	Elizabeth	Salerno
419	David	Sanders
420	Brian	Sandilands
421	Breeze	Sando
422	Ann	Sandritter
423	Paul	Sauers
424	Lise	Sayer
425	Gail	Scanlan
426	Corey	Schade
427	George	Schaefer
428	Helen	Schafer
429	Cynthia	Schieding
430	John	Schreiber
431	Gerd	Schubert
432	Karyn	Schuchardt
433	Maureen	Schulze
434	Brandon	Schwartz
435	Gil	Schwartz
436	P.	Scoville
437	Rachel	Sellen
438	Kim	Sellon
439	Susan	Sferas
440	Michael	Shakarjian
441	Annette	Shandolow-Hassell
442	Dein	Shapiro
443	Sally	Sharp
444	Vikram	Sikand
445	William	Silverman
446	Debbie	Simpkins
447	Jo	Sippie-Gora

448	Douglas	Smith
449	Patricia	Smith
450	Jaszmene	Smith
451	David	Snope
452	Diane	Soherty
453	Silvia	Solaun
454	Jiahn	Son
455	Cynthia	Soroka-Dunn
456	Carole	Speechley
457	N. C.	Starss
458	Ryan	Stauss
459	Norma	Stehle
460	David	Steinberg
461	A.L.	Steiner
462	Christina	Stephens
463	George	Stephens
464	Elyse	Sternberg
465	Barbara	Stomber
466	Richard	Stomber
467	Gail	Stoughton
468	Mark	Sudol
469	Katharine	Sween
470	Victor	Sytzko
471	Robert	Szuter
472	Nancy	Taiani
473	Sherry	Taylor
474	Paula	Tedesco
475	Kurt	Thoens
476	Barbara	Tillman
477	Janis	Todd
478	Joozer	Tohfafarosh
479	James	Tomori
480	Rosemary	Topar
481	Steve	Troyanovich

482	Justin	Truong
483	Gabriel	Tucker
484	Ross	Turiano
485	F. Joseph	Uhrhane
486	Carol	Van Kirk, PhD
487	Sandra	Van Sant
488	Ro	Vanstrien
489	Leena	Varghese
490	Lee	Varian
491	Sue	Velez
492	Maggie	Vetter
493	Ben	Vitale
494	Peter	von Christierson
495	Don	Vonderschmidt
496	Christopher F.	Vota
497	Raphael	Wakefield
498	Mark	Waltzer
499	Sheila	Ward
500	Colin	Webb
501	Kimi	Wei
502	Daniel	Weinberger
503	Boris	Weinstein
504	Charles	Weisbecker
505	Tina	Weishaus
506	Joanna	West
507	John	Wheeler
508	Toni	White
509	Ellen	Wijesinghe
510	John	Wilga
511	Keith	Wilkins
512	David	Williams
513	Paul	Williams
514	Patricia	Williamson
515	G.	Y.

516	Margaret	Yelenik
517	Dennis	Yi
518	Tracy	Youngster
519	Nicole	Zanetakos
520	Sam	Zappala
521	Judith	Zelikoff
522	Dawn	Zelinski
523	Barbara	Zipperlein
524	Bennet	Zurofsky

Table of Contents

A) Climate Change / Renewable Energy / Greenhouse Gasses

1. **Several commenters stated that we do not need additional natural gas right now so we should not be considering expanding natural gas infrastructure.**
   Comment: This week, in a filing with the Federal Energy Regulatory Commission, The New Jersey Board of Public Utilities and the Division of Rate Council have testified that New Jersey is unlikely to experience a shortage of natural gas, at least through the end of this decade and that there is no need for additional natural gas. (Ruga)
   Comment: The Board of Public Utilities had a study done in December 2021, that said we don't need any more fossil fuels in New Jersey until at least 2030. (Madison, Frost, F&WW)
   Comment: In May 2021, the International Energy Agency said that if we are going to make our 2050 goal and have any chance of turning this situation around [extreme weather events and the destabilization of our ecosystems and our communities], we need to stop the expansion of the fossil fuel industry right away. (Glick, Madison, F&WW)

   Response: The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit is limited to the addition of one natural gas-fired combustion turbine, one natural gas-fired boiler, one natural gas-fired emergency generator, one pipeline liquids storage tank, and other ancillary equipment at a single facility located in Sussex County, New Jersey. The application before the NJDEP does not include the entire Tennessee Gas Pipeline East 300 Upgrade project (East 300 Project), which includes multiple activities in multiple states. Further, when issuing a new or modified Air Pollution Control Operating Permit, the NJDEP does not have a statutory duty or the regulatory authority to conduct a "public need" determination.

   Executive Order No. 274 includes a directive that the Office of Climate Action and the Green Economy (OCAGE) "coordinate the efforts of Executive Branch departments and agencies to further develop and implement the objectives and strategies detailed in the New Jersey Energy Master Plan (EMP) and 80x50 Report or otherwise established in order to accomplish the policy set forth in this Order."

   Though EO No. 274 placed the primary responsibility for coordination of efforts with the OCAGE in November 2021, the Governor recognized the need for a comprehensive strategy to combat climate change much earlier. In 2018, Governor Murphy issued Executive Order No. 28 (May 23, 2018) (EO No. 28), which directed multiple executive branch departments to participate in updates to the EMP. The updated 2019 EMP includes extensive modeling that resulted in the identification of seven overarching strategies the State should pursue in order to meet the 80x50 goal of the Global Warming Response Act (GWRA), as well as the goal of 100 percent clean energy by 2050 set forth in the 2019 EMP. See 2019 EMP, https://www.nj.gov/emp/docs/. On October 15, 2020, the NJDEP released the GWRA 80x50 Report, which builds on the 2019 EMP by analyzing New Jersey's emissions reductions to date, evaluating plans presently in place for further reducing emissions, and presenting a set of strategies across seven emission sectors for policymakers to consider in formulating legislation, regulations,

policies, and programs to ensure that New Jersey achieves the 80x50 goal. See GWRA 80x50 Report, https://www.nj.gov/dep/climatechange/mitigation/, Executive Summary p. v.

Both the 2019 EMP and the GWRA 80x50 Report highlight the fact that reaching the 80x50 goal and the goal of achieving 100 percent clean energy by 2050 will require transformation in all economic sectors through the collaboration and planning of multiple State agencies, as well as the private sector, over the next three decades. See GWRA 80x50 Report, Introduction, and Executive Summary; and 2019 EMP, Executive Summary and Conclusion, p. 231. Thus, the strategies and recommendations of the 2019 EMP and GWRA 80x50 Report are intended to build on one another over time and across sectors.

Since 2021, the NJDEP has proposed multiple sets of rules, consistent with the strategies and recommendations of the 2019 EMP and GWRA 80x50 Report. Given the magnitude of the emission reductions needed to achieve the 80x50 goal, the NJDEP along with the Legislature and many other State agencies, will need to continue to develop, and refine, the mix of policies, rules, and laws that will be needed to mitigate climate change and strengthen resilience in the State. To date, the NJDEP has not pursued a regulatory change that would require an "alternative analysis" for emissions of greenhouse gases or a "need determination" as part of its permitting process. Should updates to the EMP and GWRA 80x50 Report include either of these analyses as a strategy or recommendation, the NJDEP would consider this idea for future stakeholder and rulemaking efforts.

2. **Comment:** Governor Murphy said that we have to integrate climate change into consideration in the air quality permit. You've been given the authority, executive order 100, take it out and use it. (Conway)

   Response:
   The NJDEP is in the process of establishing the Protecting Against Climate Threats (PACT) regulations, pursuant to executive order 100. Executive Order 100 directs NJDEP to establish the PACT regulations within 2 years of the orders issuance. See more details about the PACT rule https://dep.nj.gov/njpact/.

   As part of the PACT regulations, NJDEP recently adopted the following:
   1) Carbon Dioxide Emission Reductions from Electrical Generating Units (N.J.A.C. 7:27F-2) establishes CO2 emission limits for electrical generating units with a nameplate capacity equal to or greater than 25 MWe. These emission limits will effectively restrict electrical generating units from combusting oil, other than as a backup fuel since they will not be able to comply with the emission limits while combusting fuel oil.
   2) Carbon Dioxide Emission Reductions from Fuels (N.J.A.C. 7:27F-3) bans the storage or combustion of No.4 and No.6 fuel oil in New Jersey.

3. **Several commenters are concerned about the contribution that this project will have on global warming and climate change.**
   Comment: Gas compressors add significantly to global warming and climate change. (Rye)

Comment: This compressor station will emit more than 520 tons of greenhouse gasses each year. (Ruga)
Comment: This project will release substantial greenhouse gas emissions, contributing to climate change. (A Noel, Rogovin, Panek, Blaeuer, Sellen, Voos, McFarland, Ramos, F&WW)
Comment: This pipeline expansion would result in 312,896 additional metric tons of carbon pollution every year, plus 2,530,000 metric tons of carbon pollution emitted by downstream gas use in Westchester County, NY. (DiFalco)
Comment: This compressor station expansion approximately doubles the existing permitted methane emissions. The significant sources alone are permitted to emit 3 tons per year (tpy) of methane. Blowdowns would release millions of cubic feet of untreated natural gas into the air. (Ramos)

Response: As noted in response to comment A-1, starting in 2021, the NJDEP proposed multiple sets of rules, consistent with the strategies and recommendations of the 2019 EMP and GWRA 80x50 Reports. The NJDEP's rulemaking efforts are part of an overall strategy to meet the 80x50 goal. However, the magnitude of the emission reductions needed to achieve the 80x50 goal will require the NJDEP along with the Legislature and many other State agencies, to continue to develop, and refine, the mix of policies, rules, and laws that will be needed to mitigate climate change and strengthen resilience in the State. The NJDEP's current regulatory scheme for issuing Air Pollution Control Operating permits does not provide authority for the NJDEP to deny an application for a permit or modification of a permit because the activity would increase greenhouse gas emissions. Accordingly, these comments are beyond the scope of the NJDEP's review.

See response to comment A-2, regarding NJDEPs Protecting Against Climate Threats (PACT) regulations.

The Total CO2e emissions listed in Section A, Table 1 of the draft Operating Permit inadvertently included only potential CO2e emissions from the significant source operations at the facility (162,796 tpy). As noted in footnote 2 of that table, that value should have included all CO2e emissions for the facility, including insignificant source emissions (10,400 tpy) and fugitive emissions (649 tpy). Therefore, NJDEP has updated this value, in the proposed permit, to reflect the total potential CO2e emissions from the entire facility, including significant sources, insignificant sources and fugitive emissions (173,845 tpy). This change does not affect the potential emissions allowed by the permit as the individual permit limits have not changed.

4. **Several commenters are concerned about global warming and climate change and the effects they may have on the state of New Jersey and the planet.**
Comment: The climate crisis is real and that is why we must stop these fossil fuel projects. (Gay)
Comment: We are in a climate emergency. (Neustadter, F&WW)
Comment: I am very concerned about our local and federal government's continued approval of fossil fuel projects despite the dire realities of climate change and worse times to come. I am also concerned about the effect that the pipeline and compressor stations will have on New Jersey residents. (F&WW)

Comment: Scientists around the world are sounding alarms that climate impacts are accelerating at a rate faster than anticipated and causing real harm now. (F&WW)
Comment: The effects are global warming and climate change are already being felt, in New Jersey, the United States and the world. Increased drought, wildfires, heat waves, severe storms, flooding, sea level rise, crop failures all being caused by global warming and climate change. (Glick, F&WW)
Comment: Longer and warmer seasons and increased heat in the atmosphere are causing more ticks, harmful algae blooms and increased frequency and magnitude of hurricanes, tornadoes, winds, and other turbulent weather in New Jersey. (Clarke, F&WW, Wood)
Comment: Winds are traveling further than ever before. Texas now has hailstorms like they've never experienced before, and the northeast coast now gets tornados. Global warming is responsible for creating storms like Hurricane Sandy and Ida, which used to be a once in a 100-year event, now they occur about every 5 years. (Wood) Two tornados touched down in the Highlands Forest Region during 2021. (F&WW) Some recent effects of climate change include: the floods that devastated the Appalachian communities resulting in 30 deaths and hundreds missing, more than 2,000 lives lost in Portugal and Spain and the flooding and tornadoes brought to NJ by Hurricane Ida. (F&WW)
Comment: Hurricanes Ida, Sandy and Irene showed us the deadly consequences of the climate crisis and that we must do all we can to lower emissions. (Allessio, Powell, DiFalco)
Comment: "Sunny day flooding" will become a regular occurrence and will make some areas unlivable. Housing, water access and quality, food prices, insurance and insurable areas, healthcare and appropriate resources for inhospitable heat will become more serious issues for New Jersey. (Clarke)
Comment: We already know that the glaciers are melting, and we have had many climate disasters. (Kelly)
Comment: I don't want to consign my community and future generations to a world where these sorts of disasters increase uncontrollably. We know the only way to prevent this is to take decisive action now. (F&WW)
Comment: These are scientific facts: 1) Catastrophic climate change has begun. 2) It is going to get far worse. 3) We can still reduce the negative consequences of burning fossil fuels. (Mendez)
Comment: The earth and New Jersey only have about one to two decades to get the earth warming gases under control and down to zero to avoid the worst effects of climate change due to global warming. (F&WW)
Comment: Sea levels in Atlantic City have risen 18 inches; by 2050, the projected rise is 11 inches to 2.1 feet above 2000 levels. This rise will make coastal storms more disruptive. (Panek)
Comment: New Jersey's scientist report on climate change advises that there is a 17% chance of a 1-foot rise in sea level by 2030, a 50% chance of a 1.4 foot or more rise in sea level by 2050 and a 17% chance of a 2-foot rise in sea level by 2050. These projections extend to 3.3 to 5.1 feet by 2100. (Clarke, F&WW)
Comment: With moderate Greenhouse gas emissions continuing throughout the century, annual temperatures are expected to increase by 5 – 8 degrees Fahrenheit; with high emissions, temperatures could increase by 8 – 14 degrees Fahrenheit. Rising temperatures increase the likelihood of heat waves. (Panek)

Comment: The fourth National Climate Assessment estimated that the northeast would be about 3.6 degrees warmer on average than the pre-industrial era by 2035 but New Jersey has already experienced 3.6 degrees of warming. (Clarke, F&WW)
Comment: The average temperatures in New Jersey have climbed by almost 3.6 degrees since 1895, which is double the average for the lower 48 states. (F&WW)
Comment: Air doesn't know any borders. If you release methane here, it will pollute worldwide. That means temperature increases worldwide. (Martine, Wood, Dieterich)
Comment: Right now, there are 7 fossil fuel projects in New Jersey trying to get their permits. One study states that, if they are all permitted and built, it will lead to a 38% increase in greenhouse gas emissions. (Glick, Allessio, Powell, DiFalco)

Response: See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

5. **Several commenters stated that New Jersey must implement Governor Murphy's climate commitment goals.**
Comment: New Jersey must protect our climate and fulfill Governor Murphy's promises to address climate change by implementing his climate commitments. (Blaeuer, DiFalco, Scanlan, F&WW)
Comment: In a worsening climate and public health crisis, Governor Murphy and the NJDEP must live up to our state's climate commitments and stop new sources of fossil fuel pollution in our state. We cannot allow out of state corporate polluters to make unnecessary expansions to fossil fuel infrastructure, which already has harmful impacts on New Jersey communities to increase their own profits at the expense of NJ residents. (Allessio, Goff, Gioseffi, Fishman, Kelly, F&WW)
Comment: The Governor has given so many pro-climate action statements. Projects like this do not fit into the master plan. The administration and NJDEP need to put together a cohesive effort to meet these climate change goals. (Rapaport)
Comment: When Governor Murphy came to office, people were pleased with his promises to reduce Greenhouse Gas emissions. The State now has aggressive goals (50% GHG emission reductions by 2030 and 80% GHG emission reductions by 2050 (relative to 2006 levels) and we are less than 8 years away from the first checkpoint. (Conway, Blaeuer, Rapaport)
Comment: Governor Murphy has said that we need to do everything that we can, here in New Jersey, to act against this environmental crisis. (Glick)
Comment: Governor Murphy has time and again stated the need to fight climate change by cutting greenhouse gas emissions (GHGs). He has set state policy to achieve the virtually impossible task of reducing GHGs 50% by 2030 (which means cutting at least 60 MMT in 8 years). This task will not be made easier by supporting the expansion of Tennessee Gas Pipeline's (TGP) operation, which will increase GHG by 313,000 metric tonnes per year in NJ and add an additional 2.5 million metric tonnes of GHGs from downstream emissions. (Dolsky)
Comment: With New Jersey's GHG emission reduction goals, the expansion of an operation with a potential to emit 418 tons per year of methane (a short term GHG with a global warming potential

significantly higher than carbon dioxide) and a proposed increase of 71,996 tons per year of carbon dioxide equivalent, should not be allowed to move forward. (Ramos)

Response: See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

6. **Several commenters believe that we cannot obtain Governor Murphy's climate change goals if we continue to expand natural gas usage.**
Comment: By using fossil fuels, we are not meeting what Governor Murphy calls his climate commitments [to reduce greenhouse gasses]. We need more power grids, wind and solar energy and heat pumps not more toxic fossil fuels if we expect to survive the effects of climate change. (Blaeuer, Teshima, Keida, Powell, F&WW)
Comment: If Governor Murphy's stated clean energy goals are to have any credibility whatsoever, his administration must put a halt to climate polluting infrastructure. (F&WW)
Comment: Goal 5.4.1 of the 2020 NJ Energy Master Plan states: Approving unnecessary infrastructure expansion would be an imprudent investment and would significantly thwart efforts to achieve climate goals. This project is contrary to that goal. (Ruga, F&WW)
Comment: The proposed expansion of the Wantage compressor station goes against New Jersey's commitment to reduce greenhouse gas (GHG) emissions and address climate impacts. This expansion of fossil fuels will increase New Jersey's GHG emissions, including one of the most potent GHG emissions there is, methane. This will make it more difficult to advance clean, renewable energy and to meet New Jersey's GHG emission reduction commitment. (McFarland, Ramos, F&WW, Conway)
Comment: What is DEP's plan to meet Governor Murphy's emission reduction goals if we are increasing emissions with new fossil fuel projects? (Powell, DiFalco)
Comment: This project contradicts President Biden's and Governor Murphy's commitment to reduce reliance on fossil fuels and to address climate change. (F&WW)
Comment: Controlling methane emissions is one of the quickest ways to reduce the GHG issue. (Conway)
Comment: If NJDEP approves the 7 fossil fuel projects that are currently pending, Governor Murphy won't reach any of the climate goals that he set in his plan for New Jersey's future. (Wood)

Response: See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey. Even if New Jersey had sufficient facilities in place to generate enough electricity to fulfill its entire electrical demand with electricity from renewable energy sources, such as wind and solar, we would still need to maintain a reserve of natural gas-powered electrical generation facilities in order to ensure sufficient electrical supply during emergencies and when wind and solar generators are not available.

7. **Several commenters believe that we must stop using natural gas to survive climate change. Other commenters believe that we must switch to renewable energy.**

Comment: We will never stop climate change by building more pipelines. We need to reduce our reliance on fossil fuels in order to survive climate change. (Scanlan, F&WW) We need to stop using piped gas as a resource and let other states follow our example. (Rye, F&WW)
Comment: It is foolish to spend more money on fossil fuel infrastructure when, in order to avoid climate catastrophe, we must reduce the use of fossil fuels considerably. (F&WW)
Comment: We must stop our dependence on fossil fuels immediately to mitigate the climate crisis. According to the IPCC, we must do this within the next 5 years if we want to limit global warming by 1.5 degrees and avoid climate catastrophes. (F&WW)
Comment: There are too many dangers and risks to our health, safety, and fragile ecology to expand an already proven dangerous operation! We must say no to fossil fuels and the poisoning of our planet. (Kelly, F&WW)
Comment: Please recognize and act upon the immediate danger that climate change has brought to everyone in our state and on the planet. An expansion of the use of fossil fuels brings us ever closer to the environmental collapse we now know is our fate unless we stop the use of fossil fuels. (Fishman)
Comment: The U.N. Intergovernmental Panel on Climate Change has warned us against the expansion of fossil fuel infrastructure if we are to have a livable planet. (F&WW, Gay)
Comment: NJ DEP must have a discussion with the NY Public Service Commission to coordinate a mutual backing away from fossil fuel projects of all kinds before disastrous and irreversible damage occurs to the life-enhancing natural processes that sustain us all. These operations must be forsworn before further irrevocable damage is done to the earth's natural systems. (Voos)
Comment: We must do everything we can to avoid releasing more carbon into the atmosphere. If we don't, nothing else is going to matter. (F&WW)
Comment: We are seeing the consequences of fossil fuels globally; they are more extreme and widespread than they were 10 years ago. I lose sleep worrying about what they will be in 5 or 10 years if we don't stop enabling fossil fuels. (F&WW)
Comment: The push to continue expansion of natural gas, a fossil fuel that has been linked to climate change, air and water pollution and the destruction of pristine environments, like West Milford, is unconscionable. (F&WW)
Comment: Preventing expansion of natural gas is a necessary step toward cleaner air and toward making green energy prevalent. What was to be in 30 or 40 years is now on our doorstep, climatological doomsday is here. (F&WW)
Comment: As a community, a state, and a country, we all need to come together and face the fact that the time for fossil fuels is over. We must transition away from fossil fuels and into clean, renewable energy sources (such as solar panels, windmills, water turbines, nuclear generators) (Bijlani, K. Noel, F&WW, T. Israel, Blaeuer, Neustadter, Otto, Parlgreco, Mendez)
Comment: As a society, we need to invest money into clean renewable energy projects (such as solar and wind) instead of fossil fuel projects to help us fight global warming instead of making it worse. (Rye, F&WW) This will ensure a sustainable, healthy environment for future generations of Americans and for the world. (F&WW, Kelly).

Comment: Let's stop going back in history and go forward in a positive way. We can find other industries that we have not even thought of. We never thought of solar power and wind power before, let's give it a chance. (Cieri)
Comment: The passage of the Inflation Reduction Act demonstrates that energy expansion projects should be in the field of renewable energy sources (wind and hydro power) rather than fracked gas. The time has come for Governor Murphy and the DEP to begin living up to New Jersey's own commitment to a clean energy future. (F&WW, Voos)
Comment: Not only does this expansion put NJ at risk but it ultimately will affect NY as well. We need modern, sustainable, renewable, and clean energy. (F&WW)
Comment: Take the money spent on this unnecessary and harmful project and use it to help families pay for switching to solar, electric, geothermal, etc – Invest in our planet. (F&WW)
Comment: I applaud Governor Murphy's ambitious offshore wind projects. (F&WW)
Comment: Governor Murphy is trying to have NJ be a leader in green energy. Many studies say the opposite is true for fracking. (F&WW)
Comment: We need government leadership of the most sublime kind to bring solar and green electricity along with the infrastructure and renewable sources. (Blaeuer)
Comment: When I look at 1,000 miles of gas pipeline. I think there must be a much stronger drive for green energy. (Coffin)
Comment: Our need is for stable, green energy to run on and ultimately insure our nation. (Blaeuer)
Comment: I find it hard to believe this type of construction could be possible given the hard push that our government is making towards clean energy. (J. Kessler)

Response: See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey. Even if New Jersey had sufficient facilities in place to generate enough electricity to fulfill its entire electrical demand with electricity from renewable energy sources, such as wind and solar, we would still need to maintain a reserve of natural gas-powered electrical generation facilities in order to ensure sufficient electrical supply during emergencies and when wind and solar generators are not available.

Six New Jersey fossil fuel powered electric generating facilities have shut down in the past year. These facilities include Carneys Point Generating Plant, Logan Generating Plant, Essex Generating Station, Newark Bay Cogeneration Plant, Elmwood Park Power Plant and Pedricktown Cogeneration Plant.

8. **Several commenters believe we should get serious about addressing climate change and other environmental issues.**
Comment: When will we take action to clean up our environment and get serious about saving ourselves and the planet by addressing climate change. (F&WW, Ruga)
Comment: The climate is more important than short term and short-sighted efforts to develop energy. (F&WW)

Response: See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

9. **Commenters stated that we are working toward clean energy, but it won't happen overnight; meanwhile we should improve current fossil fuel infrastructure rather than expand it.**
Comment: We are all working toward clean, renewable energy sources but it won't happen overnight, it takes time. In the meantime, it is essential that we invest in upgrading and improving safety and environmental impacts of the cleanest currently available systems. (Stiles, Scalera, Grablutz)
Comment: I think we must live with the fact that this station is here to stay but instead of expanding it and making it bigger, more dangerous and a source of more gas release, lets upgrade it and make it safer. (Tintle)
Comment: Anyone who really opposes this gas line should go home and turn off your stove, water heater and everything else. We must live in a world with fossil fuels. (Kubicka)

   Response: The NJDEP acknowledges these comments**.**

10. **Several commenters suggested alternative projects that may reduce natural gas demand.**
Comment: If NY needs more gas, the first step should be to implement conservation programs in NY in order to reduce that need. For instance, they can use more efficient heating systems and appliances and improve the insulation in buildings. (F&WW)
Comment: New construction can easily install heat pumps and electric stoves and hot water heaters instead of gas appliances. (Dolsky, Wood)
Comment: Has a storage site on the NY side of the Hudson River to satisfy gas demand during peak situations been considered? (Dieterich)
Comment: West Milford could use the proposed compressor station site to set up a solar energy farm and use or sell the power from this clean energy source. (Dieterich, F&WW)
Comment: The 67-year-old pipeline should be decommissioned, and a string of tall, large wind towers installed in its place. It could provide truly clean energy to all of the rural households in Northern New Jersey and Northeastern Pennsylvania. (Wood)
Comment: Electric stoves running on Solar is the future. (Blaeuer)
Comment: I installed a heat pump last summer and saved a significant amount of money. (Gorman)
Comment: Solar Panels were installed on our house. Our electric bill was $7.75 last month. (Stehle)

   Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit is limited to the addition of one natural gas-fired combustion turbine, one natural gas-fired boiler, one natural gas-fired emergency generator, one pipeline liquids storage tank, and other ancillary equipment at a single facility located in Sussex County, New Jersey. The application before the NJDEP does not include the suggested alternate projects. Further, when issuing a new or modified Air Pollution

Control Operating Permit, the NJDEP does not have a statutory duty or the regulatory authority to require an alternative project be pursued.

Though potential alternative projects are outside the scope of the NJDEP's regulatory authority regarding review of this air pollution control operating permit application, New Jersey has been working toward a goal of 11,000 MW of offshore wind powered electrical generation by 2040 and is going to study the feasibility of increasing that goal. See more details on New Jersey's offshore wind pursuit https://dep.nj.gov/offshorewind/.

11. **Methane**
Comment: Methane is many times more harmful to the environment and people than other GHG. (Teshima, F&WW)
Comment: Methane is the most dominant heat-trapping gas in the atmosphere. It stays in the atmosphere for 20 years, which is precisely the window when we must cut our emissions in order to avoid the most drastic effects of climate change. (Stehle, F&WW)
Comment: A single megaton of methane, emitted into the atmosphere, can create enough ozone to cause $132 million in damages to forestry, agriculture, and public health, as well as hundreds of premature deaths annually. (Powell, DiFalco)
Comment: I am concerned about the negative environmental and public health impact of methane itself and natural gas infrastructure, including compressor stations which are known to be significant polluters. (F&WW)
Comment: There are hundreds of thousands of union members and their families here in New Jersey who want this project denied because they see that methane has destroyed state after state. (Gay)
Comment: Fossil fuels are ruining our air, our water, our land, our health, and our communities. Methane gas is poisoning our air and ruining our climate by contributing to climate change. (F&WW)
Comment: If the oil and gas industries were sincere about the methane gas leaks, they would stop kicking and screaming when the federal government tried to get them to tap the methane gas leaks. (Stehle)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The Federal Energy Regulatory Commission (FERC) is tasked with approving and regulating pipeline construction and NJDEP cannot contravene a FERC approval. The NJDEP does regulate methane emissions from the facility but methane emissions from other sources are beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application.

12. **One commenter stated that fracked gas actually has a larger GHG footprint than coal does.**
Comment: The fracked gas companies lied when they said that fracked gas had a smaller GHG footprint than coal. Since moving from coal to gas, our global warming has accelerated faster than any climate scientist predicted. (Wood)

Comment: The scientific paper "Toward a Better Understanding and Quantification of Methane Emissions from Shale Gas Development" states that leaks occur during the production of Fracked Gas and that these leaks cause extreme global warming. If the total amount of leaked gas is more than 3.2%, then using gas to generate electricity will cause more global warming than using coal to generate the same amount of electricity. Scientists tested the Marcellus Shale in Western Pennsylvania to determine how much was leaking. They determined the total Fracked Gas leakage, from these wells, to vary between 2.8% and 17.3%. Therefore, the best wells contribute almost as much, to global warming, as coal does, and the worst wells contribute more than 5 times as much as coal. The government needs to use the latest science that has evaluated the true total GHG footprint of Fracked Gas. It is much higher than you are acknowledging. (Wood)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Emissions of GHGs from the pipelines, compressor stations, and hydraulic fracturing wells, which are not part of or under the control of the facility, in this case, Tennessee Gas Pipeline Compressor Station 325 (CS325), are outside the scope of the NJDEP's regulatory authority regarding review of this operating permit application.

While those emissions are outside the scope of the NJDEP's regulatory authority regarding review of this permit application, the facility is subject to the New Source Performance Standards (NSPS) at 40 CFR 60 Subpart OOOOa, which regulates GHG emissions from oil and gas production facilities. The applicable requirements are in GR1 of the operating permit. Under this regulation, the facility is required to develop an emissions monitoring plan that covers the collection of fugitive emission components, implement that plan by determining the fugitive emissions of VOC and methane, and repair any fugitive emission components from which emissions are detected. This regulation allows the option of using either optical gas imaging (OGI) or Method 21 of appendix A-7 of 40 CFR 60 to determine emissions. The regulation can be found at https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-OOOOa?toc=1. This rule will help to reduce the lifecycle, or "cradle to grave" emissions along the natural gas production chain.

13. **Several commentors are concerned about the occurrence of "blowdowns" and the emissions that are released into the atmosphere during these events.**
Comment: Compressor stations have massive engines that maintain or increase the pressure in interstate gas pipelines. Blowdowns release some of this pressure and send toxic plumes out that can spread for 10 miles or more. They create substantial local air pollution, emitting methane, nitrogen oxides (NOx), fine particulate matter, carbon monoxide, benzene, and formaldehyde. These are known as carcinogens and are linked to respiratory problems like asthma and bronchitis. (Clarke)
Comment: Blowdowns release toxic chemicals into the air which cause an awful nauseating smell and frequent noises that can be as loud as a jet engine; they can last for multiple hours. Some residents that live near compressor stations had to evacuate their homes during blowdowns. (Allessio, Dolsky, DiFalco, F&WW)

Comment: Compressor stations routinely expel unfiltered gas during a necessary maintenance process called blowdowns. This is done in order to test the safety system, which releases unfiltered gas any time the pressure gets higher than what is deemed to be safe. (Wood, Bijlani, Allessio, DiFalco, Kelly, Teshima, Jackson, Aquino, F&WW)
Comment: Compressor stations experience both scheduled and unscheduled blowdowns which release methane and other pollutants into the air. (Gorman, McFarland)
Comment: Emergency blowdown events are not rare for compressor station facilities. (Ramos)
Comment: I saw a compressor station schedule that had scheduled blowdowns at least once a month just for routine testing. This does not include unscheduled blowdowns intended to release the pressure in the pipeline. Our neighbors in Westtown, NY, reported that blowdowns occur twice a week at their compressor station (Minisink). (Wood)
Comment: I implore you to reverse the permit for TGP at its current location on Burnt Meadow Road, just north of the water's edge at Monksville Reservoir in West Milford. Ground contamination and air pollutants that are released during scheduled pipe venting sessions will negatively impact the health of residents in the immediate area as well as impacting those throughout the state who rely on the reservoir for potable water. (F&WW)

Response:
N.J.A.C. 7:27-16.1 defines "blowdown event" to mean "the non-emergency release of natural gas from a pipeline for the purposes of inspection, maintenance, or repair and where, in the absence of control, more than 2,000 pounds of VOC could be released to the atmosphere." N.J.A.C. 7:27-16.21 "Natural Gas Pipeline" states what measures facilities that own or operate natural gas pipelines must implement to control emissions during blowdown events. N.J.A.C. 7:27-16.21(a)1. requires that a facility prepare a Control Measure Plan to identify each control technology or procedure available for achieving VOC reductions from a blowdown event. N.J.A.C. 7:27-16.21(c) requires that the facility submit a report to the NJDEP setting forth the location, date and duration of each blowdown event, a description of the emissions reduction procedures and technology used, and a quantification of the amount of VOC emission reductions achieved for each event. N.J.A.C. 7:27-16.21(d) allows the NJDEP to require amendments to the Control Measure Plan, as necessary.

In the Operating Permit for the CS325 facility, Pipeline Blowdown Events are listed as an insignificant source, with a IS18 designation. The N.J.A.C. 7:27-16.21 requirements have been included in the compliance plan under IS18 "Pipeline Venting (TXS < 0.1 lb/hr)"

The NJDEP's authority to regulate planned blowdown events is limited to the provisions of N.J.A.C. 7:27-16.21. However, the NJDEP will evaluate these current regulations to determine if any revisions need to be made to the N.J.A.C. 7:27-16.1 definition of "blowdown event" and to reflect any advancements developed to minimize blowdown event emissions. This evaluation will include examining the data collected in response to the recently adopted GHG monitoring and GHG reporting rule.

The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit for CS325 in Wantage, NJ. The application before the NJDEP does not include the proposed Tennessee Gas Pipeline Compressor Station 327 (CS327) in West Milford, NJ which is part of the East 300 Project but is not a part of CS325.

14. **Comment:** The Federal Energy Regulatory Commission (FERC), which issued the federal level approval for this project, has not done a thorough analysis of this projects impacts on the climate, including a statement in their final Environmental Impact Statement that they cannot determine the climate impacts of this project. (F&WW)

    Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Decisions made by other organizations, such as the FERC, are outside the scope of the NJDEP's regulatory authority regarding review of this permit application. FERC is tasked with approving and regulating pipeline construction and NJDEP cannot contravene a FERC approval.

15. **Comment:** The New Jersey 80X50 report advises, regarding forests and carbon sequestration, "To achieve New Jersey's ambitious 2050 greenhouse gas reduction target, the state must maintain and strengthen its commitment to protecting and enhancing the carbon pools of its natural lands". DEP recommends developing a statewide carbon sequestration plan, which establishes both a 2030 and a 2050 sequestration target. Nothing sequesters carbon like trees and specifically like healthy old growth forests with natural growth and biodiversity below. Nothing cleans water like forests either. We should be protecting this essential natural resource. (Clarke)

    Response:
    The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Forests and carbon sequestration are outside the scope of the NJDEP's regulatory authority regarding review of this permit application.

    See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey. These measures have been taken by New Jersey in order to meet the 80x50 goal.

B) Health Effects

1. **Several commenters are concerned about the potential health effects of the pipeline and compressor stations.**
Comment: It's a health hazard to the whole community before the expansion even takes place. (Evans)
Comment: Building a compressor station would lead to adverse health conditions. (Panek)
Comment: The many chemicals that are emitted into the air and water by a compressor station directly affect public health. (McFarland)
Comment: I am worried about the short and long term affects for all who live in this area. (B. Kessler, F&WW)
Comment: There are well documented short-term and long-term health dangers to nearby residents from such facilities. (Voos)
Comment: Living near a compressor station can have the following health effects:
Short Term Health Affects: coughing, headaches, respiratory distress, nose bleeds, dizziness, rashes, nausea, and noise. (Teshima, Allessio, DiFalco, Jackson, Aquino, F&WW, Ebbinkhuysen)
Long Term Health Affects: Increased risk of a number of diseases including cancer, cardiovascular disease, asthma, chronic obstructive pulmonary disease, neurological conditions, stroke, heart attacks, neurodegenerative diseases, central nervous system dysfunction, birth defects, poor birth outcomes and premature death. (Allessio, Dolsky, Burgi, Cooper, Powell, DiFalco, F&WW, Ebbinkhuysen)
Comment: During the massive blowdown that occurred on January 1, 2022, local residents suffered severe headaches. These headaches are symptoms of more severe neural and tissue damage to the sinuses, the brain and the circulatory system. (Wood)
Comment: The compressor station in Minisink, NY has caused serious health impacts to residents including nosebleeds, headaches, rashes, and respiratory, gastrointestinal, and neurological systems. (DiFalco, Jackson, Aquino, F&WW)
Comment: Every time the compressor blows down, it releases toxic chemicals and organic compounds into the air. These pollutants get into the water and the soil. They also enter the human body through the lungs while breathing, through the skin, while washing, and through the digestive system, while drinking contaminated water or eating contaminated food grown locally. (Wood)
Comment: Fossil fuel projects threaten and pollute our air and exacerbate climate impacts. I was born when there was 330 parts per million of carbon dioxide in the atmosphere and the summers were cool, but now we're living near 415 parts per million and the number of high ozone days, heat waves and elevated threat days for people with asthma, COPD, and breathing issues in the young and the elderly are on the rise. (Clarke)
Comment: Studies show that air pollution may be contributing to the rise in neurodevelopmental disorders including autism and neurodegenerative disorders such as Parkinson's disease, amyotrophic lateral sclerosis, and Alzheimer's disease. (Sellen, Allessio, Dolsky, Burgi, Cooper, Powell, DiFalco, F&WW)
Comment: It is evident in the medical literature that fracked gas compressor stations increase the risk of almost every major category of human disease, including cancer, cardiovascular disease, asthma,

chronic obstructive pulmonary disease, central nervous system dysfunction, birth defects, endocrine disorders, poor birth outcomes as well as pre-mature death. (Sellen, Rogovin, F&WW)
Comment: Communities surrounding the proposed compressor stations will be exposed to dirty air that puts them at increased risk for respiratory diseases, asthma attacks, increased hospitalizations, reproductive problems, blood disorders, neurological problems, and cancer. (Curtis, Marshall)
Comment: If you cook with gas, you better put that vent on because gas is not the healthiest thing to be breathing. (Allessio)
Comment: Leaks or explosions would create lasting damage to the health of families for generations to come. (Sellen, F&WW)
Comment: Not only do I think of human health casualties from exposure to these toxic fumes, but what about the wildlife, domestic and farm animals. Our neighbor reports that the gasses settle in the valley, where they raise their beef cattle – our feed animals are getting poisoned. (Jackson, F&WW)
Comment: Many veterans were exposed to toxins, in their water, for years from Camp Legeune. Now they are getting cancer and dying. Let's not make this mistake again – we can stop this from happening now because we've already exposed the problems. We have the power to stop this now and not wait for countless numbers of innocent people to be impacted. (Cieri) Many of the VOCs found at Camp Legeune are also found in fracked gas vapors, such as benzene and toluene. It is time that NJDEP acknowledged how VOCs and HAPs from CS325 have harmed and continue to harm NJ citizens. (Wood)

Response:
The following are the hazardous air pollutants (HAPs) authorized in the Operating Permit to be emitted from the three natural gas-fired combustion turbines: acetaldehyde, acrolein, benzene, cadmium, ethylbenzene, formaldehyde, naphthalene, polycyclic aromatic hydrocarbons, and propylene oxide. These are the nine HAPs emitted above the applicable reporting thresholds in N.J.A.C. 7:27-17.9, Table 3A. The maximum allowable HAP emission rates were modeled using permitted stack parameters and the latest AERMOD model version 21112. AERMOD model generated the maximum ambient impact levels (in micrograms per cubic meter) for each HAP and the health risks were determined using each HAP's Reference Concentration for non-carcinogenic risk, and Unit Risk Factor for carcinogenic risk.

The following tables list the potential Facility-Wide Short-Term Non-Carcinogenic Health Risks (Table 1), potential Facility-Wide Long-Term Non-Carcinogenic Health Risks (Table 2), and potential Facility-Wide Carcinogenic Health Risks (Table 3):

Table 1. Tennessee Gas Pipeline Compressor Station 325
Facility-Wide Short-Term Non-Carcinogenic Risk

Pollutant	Averaging Period (hour(s))	Short-Term RfC (ug/m^3)	Maximum Modeled Concentration (ug/m^3)	Short-Term Hazard Quotient
Acetaldehyde	1	470	2.11E-02	4.49E-05

Acrolein	1	2.5	3.38E-03	1.35E-03
Benzene	1	27	6.33E-03	2.34E-04
Ethylbenzene	24	1,000	1.7E-03	1.70E-06
Formaldehyde	1	55	1.52E+00	2.76E-02
Propylene Oxide	1	3,100	1.53E-02	4.94E-06

Table 1 shows the maximum calculated short-term non-carcinogenic risk for each HAP. The maximum short-term hazard quotient is 0.0276 for formaldehyde emissions. The NJDEP negligible hazard quotient threshold is 1.

Table 2. Tennessee Gas Pipeline Compressor Station 325
Facility-Wide Long-Term Non-Carcinogenic Risk

Pollutant	Long-Term RfC (ug/m^3)	Maximum Modeled Concentration (ug/m^3)	Long-Term Hazard Quotient
Acetaldehyde	9	7.12E-04	7.91E-05
Acrolein	0.02	1.14E-04	5.69E-03
Benzene	3	2.13E-04	7.11E-05
Cadmium	0.02	2.91E-05	1.46E-03
Formaldehyde	9	2.09E-02	2.32E-03
Napthalene	3	2.65E-06	8.84E-07
POM / PAH	0.002	4.48E-06	2.24E-03
Propylene Oxide	30	5.15E-04	1.72E-05

Table 2 shows the maximum calculated long-term non-carcinogenic risks. The maximum long-term hazard quotient is 0.00146 for cadmium emissions. The NJDEP negligible hazard quotient threshold is 1.

Table 3. Tennessee Gas Pipeline Compressor Station 325
Facility-Wide Carcinogenic Risk

Pollutant	Unit Risk Factor $(ug/m^3)^{-1}$	Maximum Modeled Concentration (ug/m^3)	Cancer Risk
Acetaldehyde	2.20E-06	7.12E-04	1.57E-09
Benzene	7.80E-06	2.13E-04	1.66E-09
Cadmium	4.20E-03	2.91E-05	1.22E-07
Ethylbenzene	2.50E-06	5.69E-04	1.42E-09
Formaldehyde	1.30E-05	2.09E-02	2.71E-07
Napthalene	3.40E-05	2.65E-06	9.02E-11
POM / PAH	6.00E-04	4.48E-06	2.69E-09

Propylene Oxide	3.70E-06	5.15E-04	1.90E-09

Table 3 shows the maximum calculated carcinogenic risks from the entire facility. A maximum incremental cancer risk of less than 1.0 in a million was calculated for cadmium emissions. The NJDEP facility-wide cancer risk threshold considered negligible is 10 in a million.

The health impact levels were determined using:

1) Technical Manual 1002, "Guidance on Preparing an Air Quality Modeling Protocol" (https://www.state.nj.us/dep/aqpp/downloads/techman/1002.PDF) which provides guidance on how to develop and conduct air quality modeling.
2) Technical Manual 1003 "Guidance on Preparing a Risk Assessment for Air Contaminant Emissions" (https://www.state.nj.us/dep/aqpp/downloads/techman/1003.pdf) which outlines how health risk determinations are conducted.

As shown in Tables 1, 2, and 3 above, the inhalation health risks from the HAP emissions of the three natural gas-fired combustion turbines are all negligible.

The three natural gas-fired combustion turbines will emit the following criteria pollutants: volatile organic compounds (VOC), carbon monoxide, oxides of nitrogen (NO_x), particulates, and sulfur dioxide. Particulates, and sulfur dioxide have National Ambient Air Quality Standards (NAAQS). Ground level ozone is also a criteria pollutant with a NAAQS. VOC and NO_x are classified as precursors to ground level ozone formation. NAAQS are established by the USEPA to protect human health with an adequate margin of safety. None of the criteria pollutants exceeded the emission threshold levels for the Prevention of Significant Deterioration air quality analysis requirements set forth at 40 Code of Federal Regulations Part 52.21 and the emission threshold levels set forth at 40 Code of Federal Regulations Part 51 Subpart I "Non-attainment New Source Review (NNSR)." As a result, it can be concluded that the criteria emissions from the turbines will not cause or significantly contribute to an exceedance of any NAAQS.

Any off-property impacts, including odors or visible emissions generated during construction activities, would be a violation of N.J.A.C. 7:27-5 and can be reported to the NJDEP hotline (1-877-6337).

2. **Several commenters are concerned about the health effects on children who are most vulnerable.**
Comment: Infants and children are the most likely to be harmed, due to their immature respiratory and immune systems, higher respiratory rates higher lung surface to body weight ratios, greater biological vulnerability and their long future lifetime during which disease can manifest. (Sellen, Rogovin, Allessio, Dolsky, Burgi, Cooper, DiFalco, F&WW, Scanlan)
Comment: Long term health effects of the January 1, 2022, blowdown (such as childhood Leukemia and other hematological cancers) affect children most. (Teshima)
Comment: Harmful chemicals have been found in the bodies of children living near fracking wells at levels up to 91 times as high as the average American. These chemicals cause a variety of health problems, including skin and respiratory irritation, organ damage and increased cancer risk. (McFarland)

Comment: I was a pediatric nurse for most of my 20 plus years as a nurse. I know first-hand how polluted air harms New Jersey's children and I have seen pediatric asthma rates soar, a direct consequence of air pollution caused by fossil fuels. While working as a pediatric nurse and a school nurse, I saw how the pulmonary and cardiovascular health of my patients and students worsened, as I progressed through my career. (Aquino)
Comment: The state of the air report by the ALA found that 7 New Jersey counties received an "F" (failing) for exceeding the national air quality standard for ground level ozone. This is a direct result of the fossil fuel industry. The children who live in these 7 counties are living with a quality of air that promotes lung disfunction, asthma, respiratory and pulmonary maladies as well as other health issues. That is 1/3rd of New Jersey's counties! (Aquino)

Response: The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1). The Health Risk Assessment that was conducted considers sensitive populations, such as children.

3. **Several commenters shared studies that show how harmful natural gas and its transport can be to human health.**
Comment: A Harvard study found that 8 million people, worldwide, died in the year 2018, from fossil fuel pollution. That is equivalent to the population of New York City. (Aquino)
Comment: The World Health Organization recently stated that there are 4.2 million deaths every year as a result of exposure to ambient outdoor air pollution, most comes from the combustion of fossil fuels, including natural gas. (Sellen, F&WW)
Comment: A recent study, looking specifically at death rates of those who live near compressor stations, found that the VOCs emitted were associated with significantly higher mortality. (Sellen, Bijlani, Allessio, Dolsky, Burgi, Cooper, DiFalco, F&WW)
Comment: The scientific paper "Estimating Population Average Casual Effects in the Presence of Non-Overlap the Effect of Natural Gas Compressor Station Exposure on Cancer Mortality" proved that there is positive correlation between the presence of a compressor station in a county, and an increase in Leukemia and Thyroid Cancer in that county. (Wood)
Comment: A January 2022 National Institute for Health Article, that evaluated atmospheric VOCs pollution characteristics and did a health risk assessment, concluded that motor vehicle and fossil fuel production contributed relatively high carcinogenic risk. (Bijlani)
Comment: A study done on indoor air quality in homes near the Winston Salem compressor station in Ohio shows that homes less than 2 kilometers from compressor stations had benzene levels that were 2 to 17 times greater than the Ohio Environmental Protection Agency standards due to vapor intrusion. Other VOCs, including methylbenzene, chloroform and naphthalene also exceeded state standards for indoor concentrations. (Bijlani, Allessio, DiFalco)

Comment: New studies show that people have gas leaking in their kitchen, introducing benzene and VOCs into their homes (Ziesche)

Response: A Health Risk Assessment was conducted for this project by the facility and reviewed and approved by the NJDEP. All health risks were predicted to be negligible (see response to comment B-1).

This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. Gas leaks and soil vapor intrusion are beyond the scope of the NJDEP's authority regarding review of this air pollution control permit application.

4. **Several commenters are concerned about the health effects of the fracked gas which will come from this project.**
Comment: Fracking and pipelines are not only bad for the environment but for the people living near them. Fracking causes health issues like asthma, cardiological problems and cancer. (A. Noel, F&WW)
Comment: We are the water that we drink and the air that we breathe. Fracking gas is like Crystal Meth, it may feel good for a while, but it will kill us in the end. (Owl)
Comment: Fracked gas is primarily methane which is a major greenhouse gas that is heating up our planet. (Jackson, Aquino, F&WW) Methane has 86 times more climate warming power than carbon dioxide over a 20-year period. (Curtis, Marshall, F&WW, Bijlani, Allessio, DiFalco)
Comment: Fracked gas is toxic; it contains Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) that are hazardous to humans. (Wood, Blaeuer)
Comment: Fracked gas also contains ethane and MTBE's which cause health hazards. (F&WW)
Comment: This compressor station will introduce a number of toxic gasses into the pristine environment of the Highlands Preservation. (Ruga)
Comment: Gas fracked from Marcellus Shale, such as the gas in this pipeline, is shown to contain radioactive compounds and heavy metals, including radon, polonium, and lead. This has been found to introduce carcinogenesis and short-term exposures have been associated with decreased lung function, increased blood pressure and inflammation. (Allessio, Dolsky, Burgi, Cooper, DiFalco, Ziesche, Sellen, F&WW)
Comment: Older fracked gas pipelines are lined with asbestos. (Sellen, F&WW)
Comment: I've met people on the other side of this pipeline who can't drink their water and whose air is poisoning them. I've also talked to a lot of workers in the fracking industry, who have cleaned up spills in their own communities and will no longer hunt or fish because they know the air and land is contaminated. I've met workers who can't even play with their kids anymore because they were breathing on well pads, exposed to all the chemicals. (Ziesche)
Comment: Fracked gas compressor stations destroy the health of the local residents. When they have outlived their lifespan, they should be decommissioned rather than replaced. Now that we know how hazardous the fracking industry is, we should not continue it. (Wood)

Response: Pursuant to N.J.A.C. 7:27-22.2, New Jersey Title V Operating Permit requirements apply to a facility as defined in N.J.A.C 7:27-22.1. The NJDEP evaluates the permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The source of the natural gas, and associated hydraulic fracturing operations, are not in New Jersey. Therefore, they are outside the scope of this review.

The operating permit does not authorize any heavy metals, except for Cadmium, to be emitted, from this facility, at levels over the reporting threshold listed in N.J.A.C. 7:27-17. A Health Risk Assessment was conducted for this project by the facility and reviewed and approved by the NJDEP. All health risks were predicted to be negligible (see response to comment B-1).

5. **One commenter is concerned about endocrine disruptors which she explains are released during natural gas fracking.**
Comment: The VOCs that leak out with the gas are known as endocrine disruptors. They disrupt the hormones that control every part of our bodies. This disruption is harmful to all and can do extreme damage to our developing children. (Wood)
Comment: VOCs can disrupt the endocrine systems of human beings in extremely small amounts. Some of them are dangerous on an atomic level (including radioactive elements) where no amount of exposure is safe. (Wood)
Comment: The EPA does not regulate VOCs at the tiny amounts (parts per trillion) that produce endocrine disruption. (Wood)
Comment: The EPA has been knowingly releasing chemicals without correctly affecting their effects on the endocrine systems of children. They have also withheld information, regarding the carcinogenic effects of some of the VOCs. (Wood)

   Response: A Health Risk Assessment was conducted for this project by the facility and reviewed and approved by the NJDEP. All health risks were predicted to be negligible (see response to comment B-1).

6. **Several commenters state that there are documented cases around the country of residents becoming sick when a compressor station moves into their neighborhood.** (F&WW) **Some commentors documented personal health issues that appear to have been caused by the Wantage compressor station and associated pipeline.**
Comment: I moved to Wantage about 1 year ago and live about a mile from the compressor station. My health has been very good but several months after moving to Wantage, I developed a health issue. I went to several different doctors over several months for it and eventually started drinking bottled water instead of tap water, about six or eight months ago. Switching to bottled water has almost resolved the health issue that I was having. (Tintle)
Comment: My childhood home of 31 years is next door to a TGP fracked gas power plant. I've enjoyed perfect health with no problems. During the pandemic, I moved back home. While I was living there, this power plant was built. Within 3 months of living next to that power plant, I was diagnosed

with COPD and asthma. I never had trouble breathing but within that time, I found myself gasping for air, even just eating. Last week, I was told that I have pre-lupus. (Martine)
Comment: There are enough studies that document the rise in serious illnesses in people living near compressor stations. There are childhood and long-term consequences such as 40% increased cancer rates and increased rates of Parkinson's disease, cardiovascular disease, asthma, and birth defects. (Rye)

Response: A Health Risk Assessment was conducted for this project by the facility and reviewed and approved by the NJDEP. All health risks were predicted to be negligible (see response to comment B-1).

7. **One commenter believes, based on his studies of natural gas compressor stations, that the ultrafine particles that are released by these engines pose a threat to human populations in the vicinity and that no "safe level" of exposure can be defined.**
Comment: I have studied natural gas compressor facilities in West Virginia and have concluded that the concentration of air pollution which I have monitored around these compressor facilities poses a threat to human populations in their vicinities. This threat to health comes primarily from the ultrafine particle size of the air pollution emitted by the compressor facility engines, particularly if they are diesel powered. My research in ultrafine particle generation and exposure would also lead me to conclude that natural gas fired engines may pose a similar threat. (McCawley)
Comment: The size of these ultrafine air pollution particles is not specifically regulated by EPA currently, the proper metric of which is particle number concentration, and which is not accurately convertible from the particle mass measurements collected for current regulatory control. Therefore, no assurance of the exposures can safely be made for assurances of health protection by any current regulatory agency. (McCawley)

Response: Ultrafine particulate emissions from natural gas combustion is inherently low. Natural gas combustion is considered to be State of the Art (SOTA) and Best Available Control Technology (BACT).

This project did not trigger further review under Prevention of Significant Deterioration (PSD) regulations (40 CFR 52. 21) because the proposed increase in fine particulates (PM2.5) is well below the significant increase threshold of 10 tpy.

This project did not trigger further review under Control and Prohibition of Air Pollution from New or Altered Sources Affecting Ambient Air Quality (N.J.A.C. 7:27-18) because the proposed increase in PM2.5 is well below the Significant Net Emission Increase level of 10 tpy. NJ is in attainment for fine particulates and the facility-wide emission levels of fine particulates are well below the level that would trigger modelling (100 tons per year).

8. **Several commenters are concerned about the various pollutants that are emitted by the compressor station and associated pipeline.**

Comment: Gas driven compressor stations emit Nitrogen Oxides (NOx), Fine Particulate Matter, Volatile Organic Compounds, Carbon Monoxide, Methane and Hazardous Air Pollutants such as Benzene and Formaldehyde, that pollutes nearby communities, increasing the number of people subject to various diseases. (Rogovin, F&WW, Bijlani, Allessio, DiFalco, Curtis, Marshall) If this expansion is approved, a higher volume of gas will be combusted onsite around the clock and the emission of these pollutants will increase. (Bijlani, DiFalco)
Comment: The chemicals emitted from the compressor stations will create ground level ozone. Ozone and particulate matter contribute to respiratory and cardiovascular health problems, such as chronic bronchitis, asthma, emphysema and existing heart disease as well as cause labored breathing and reduce life expectancy. (Bijlani, Allessio, DiFalco, Sellen, F&WW)
Comment: Compressor station emissions can increase ozone formation. Prolonged contact with ground level ozone is linked to asthma and chronic obstructive pulmonary disease. When mixed with particulate matter, which has been linked to various cancers, smog can form. Smog is linked to pre-mature deaths and low birth weight in babies. (Powell, DiFalco)
Comment: VOCs are a large group of chemicals that include toxic carcinogens like formaldehyde and benzene. (Jackson, Aquino, Ramos)
Comment: Formaldehyde is identified as a toxic air contaminant based on public exposure and its potential to cause cancer (long term exposure to formaldehyde has been shown to be associated with an increased risk of cancer of the nose and accessory sinuses, nasopharyngeal and oropharyngeal cancer, and lung cancer in humans). (Bijlani, DiFalco) The compressor station is proposed to emit 5 tons of formaldehyde annually. Has the DEP considered the risk to human health from high volumes of formaldehyde exposure. (DiFalco)
Comment: Benzene, a compound contained in the natural gas that is released into the environment from pipelines and found at alarmingly high levels near compressor stations, is a carcinogen that causes childhood leukemia, other blood related cancers and likely other hemotological cancers. Medical literature suggests there is no safe level of exposure to Benzene. (Rogovin, Bijlani, Sellen, Allessio, Dolsky, Burgi, Cooper, Powell, DiFalco, F&WW, Jackson, Aquino, B. Kessler)
Comment: A growing body of scientific literature demonstrates compressor stations release substantial volumes of hazardous air pollutants from fugitive emissions and blowdowns that increase both morbidity and mortality. (Sellen, F&WW)
Comment: The EPA found that, in a 6-year period, 18 compressor stations in NY released 36.99 million pounds of 70 different air pollutants, including 39 chemicals known to be human carcinogens. (Sellen, F&WW)
Comment: Compressor stations are proven to exceed federal standards for air pollution from formaldehyde, nitrogen sulfide, benzene and other volatile organic compounds by as much as 10,000-fold. (Bijlani, Sellen, Allessio, Dolsky, Burgi, Cooper, DiFalco, F&WW)

Response: Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

This project did not trigger further review under PSD or N.J.A.C. 7:27-18.

9. **Comment:** I would like TGP to show us their new air quality parameters. Tell us how you are preventing and ensuring no negative health issues as a result of the planned and unplanned compressor station blowdowns. (Jackson, F&WW)

   Response: For each source permitted, the operating permit contains all applicable emission limits and operating parameters, along with monitoring and recordkeeping requirements to ensure compliance. In addition, the NJDEP will conduct a compliance inspection at the facility on a routine basis. If the facility violates these requirements, it is subject to monetary penalties or other enforcement action pursuant to N.J.A.C. 7:27A-3.

   Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

   Blowdowns are regulated by N.J.A.C. 7:27-16.21 and those requirements have been included in the compliance plan under IS18 "Pipeline Venting (TXS < 0.1 lb/hr)" (see response to comment A-13).

10. **One commenter is concerned about the death rate of Sussex County due to the presence of a compressor station.**
    Comment: The scientific papers titled Natural Gas Pipeline Compressor Stations, VOC emissions, and mortality rates quantified the increase in death rate, due to the presence of a compressor station. They found about 2% more deaths occur in counties that have a compressor station. (Wood)
    Comment: Sussex County already has a death rate that is (adjusted for age) 12% higher than the average death rate in New Jersey. This is, in part, because Sussex County has a compressor station already. In my opinion, Sussex County should be designated an environmental justice area so that its residents can be spared further toxic exposure. (Wood)
    Comment: Between 2000 and 2011, the death rate in Sussex County had been decreasing, due to improvements in the health system. But in 2012, when CS325 was installed that was reversed, the death rate in Sussex County increased 3.6% the year that CS325 went online, while the death rate in other counties continued to drop. (Wood)

    Response: A Health Risk Assessment was conducted for this project by the facility and reviewed and approved by the NJDEP. All health risks were predicted to be negligible (see response to comment B-1).

C) Safety / Emergency Response

1. **Several commenters are concerned that expanding the compressor station would be unsafe. Some commenters are concerned there is no emergency response plan.**
Comment: There should be a mitigation plan in place in the event that a spill of hazardous chemicals occurs onsite to prevent compounds from entering the ground water. (Allessio, DiFalco)
Comment: TGP has no plan in place to control emergencies like leaks, explosions, bursts, or fires that might occur. Local first responders are not trained to deal with these sorts of disasters which could easily turn into a massive forest fire in these heavily wooded regions. (F&WW)
Comment: This project presents a safety hazard to the environment and surrounding communities. There are 5 schools right here in the immediate area. (McFarland, Panek, Keida)
Comment: Compressor stations also put people in physical danger. Measuring gas pressure within the compressor is difficult and not reliable. Explosions occur, such as those in Boston in recent years, harmful chemicals escape into the air when blowdowns occur. (Rye)
Comment: New Jersey residents that live near the pipeline and compressor station have a right to feel safe and for our government not to add more risks to their lives. (F&WW)

   Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The development and implementation of emergency response plans is beyond the scope of the NJDEP's authority regarding review of this air pollution control permit application.

   FERC is tasked with ensuring that appropriate plans are in place and implemented, to prevent compounds from entering ground water during construction, operation and maintenance activities. The FERC reviewed TGP's Environmental Report for the Project, which included the following plans: FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (FERC Plan) and FERC's *Wetland and Waterbody Construction and Mitigation Procedures* (FERC Procedures), a Project-specific *Spill Prevention and Response Procedures (SPRP), Plan for Unanticipated Discovery of Contaminated Soils or Groundwater*, and other Project-specific plans to minimize potential impacts on surface and groundwater resources. The FERC issued a certificate order authorizing the Project on April 21, 2022.

   Federal law establishes pipeline safety standards for the safe operation and maintenance of natural gas pipelines. These regulations, developed by the United States Department of Transportation (USDOT) are codified in 49 CFR Part 192 et seq. and specify design and construction requirements, liquid removal, emergency shutdown procedures, pressure limiting devices, additional safety equipment, and ventilation requirements for compressor station facilities. The USDOT regulations at 49 CFR § 192.615 require pipeline operators to establish an Emergency Plan which provides written procedures to minimize the hazards from a gas pipeline emergency. TGP's Emergency Response Plans are developed in accordance with the USDOT regulations and audited for compliance by the USDOT.

Pursuant to the USDOT Pipeline and Hazardous Materials Safety Administration requirements, compressor station operators are required to establish and maintain liaison with appropriate fire, police, public officials, and local utilities to learn the resources and responsibilities of each organization that may respond to a gas pipeline or facility emergency and must coordinate mutual assistance in responding to emergencies. The operator must also establish a continuing education program to enable customers, the public, government officials, and those engaged in excavation activities to recognize a gas pipeline or facility emergency and report it to appropriate public officials as required.

TGP has indicated that they have established relationship with emergency management in both the Township of Wantage and the Township of West Milford and has an agreement with each township, to continue to provide local training to the respective offices of emergency management and fire companies of Wantage Township and West Milford Township.

2. **Several commentors are concerned that the current compressor station is monitored remotely from Texas and the expanded Wantage site as well as the West Milford site are proposed to be monitored remotely as well.**
Comment: The facility was unstaffed when the January 1, 2022 blowdown occurred and it took nearly 2 hours for an operator to arrive onsite and fix the problem. (Rogovin, Allessio, Gioseffi, Kelly, DiFalco, Jackson, Aquino)
Comment: Employees are only onsite, at this compressor station, during work hours; during evenings, weekends and holidays the site is overseen from Texas. (Allessio)
Comment: The January 1, 2022 blowdown incident highlights the danger of these facilities, especially when they are monitored remotely, from Texas, without round the clock onsite monitoring. (Allessio, Kelly, DiFalco)
Comment: The proposed compressor stations would be monitored remotely, from Texas. (Clarke, F&WW)
Comment: The proposed compressor stations would only have one worker onsite and during daytime hours only. (F&WW)

Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The location from which a facility is monitored is beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application. USDOT establishes pipeline safety standards for the safe operation and maintenance of natural gas pipelines. These regulations, codified at 49 CFR Part 192 et seq., specify that compressor stations must have an emergency shutdown system that can be manually operated from at least two points. FERC ensures that the proposed plan complies with these requirements before approving the project.

TGP provided the following information to address these comments:
In addition to manual shutdown points, CS325 is currently equipped with, and new CS327 will be equipped with, a full range of automatic emergency detection and shutdown systems, including fire and hazardous gas detection alarm systems, which are monitored 24 hours a day. Both compressor stations

will be linked to a central control system through a Supervisory Control and Data Acquisition (SCADA) system that monitors Tennessee's system 24 hours per day, 365 days per year. If operating conditions fall outside predetermined ranges, alarms will be activated at the control center in Houston, Texas to enable timely diagnosis and mitigation of the alarm condition. The control center can react to an emergency pipeline condition immediately by remotely opening or closing valves to shut down or activate necessary pipeline facilities to control the event. In addition, field personnel are available in the vicinity of the compressor station to respond to emergency events on its pipeline system at any time of day. In the event of an emergency shutdown or alarm, the emergency procedures contained in the facility-specific Emergency Response Manual (emergency response plan) will be implemented.

3. **Several commenters described their experience of the blowdown that occurred on January 1, 2022 and are concerned about the dangers associated with events such as this.**
Comment: On January 1, 2022, an accident at the Wantage compressor station caused gas from the compressor to vent directly into the air for over 1 hour. Multiple 911 calls were made. Some residents reported noise as loud as a jet engine, suffering headaches and nausea from the noxious fumes. The toxic plume could be smelled for at least 20 miles reaching Middletown, NY. TGP never notified the residents what happened. (Allessio, Gioseffi, B. Kessler, Kelly, DiFalco, Jackson, Aquino, Teshima, F&WW)
   - **Comment:** We live very close to the compressor station. On January 1, 2022, we woke up and it sounded like a jet engine in our backyard. That sound continued for at least 1 hour and 10 minutes. Our backyard smelled like propane for hours. I had a headache for the rest of that day and had to worry about how it was affecting my three-year-old son. And if it gets expanded, this is only going to get worse. (K. Kessler, F&WW)
   - **Comment:** On January 1, 2022, I was going outside for a walk, and I heard a terrible jet engine sound from the front of my house, it was the pipeline. A little while later I smelled a terrible smell and within minutes, I had a terrible headache. This continued for over one hour. (Jackson, F&WW)
   - **Comment:** We live very close to the compressor station. It was horrible that day. (Keida)

Comment: On January 1, 2022, a blowout sent a toxic plume into the air and then up to New York State. I'm calling it a blow out because calling it a blowdown is an attempt to make it sound innocuous. (Scanlan)
Comment: TGP has yet to say anything to the public about the blowdown that occurred on January 1, 2022. (Glick, Dieterich, Allesio, Teshima, Ruga, DiFalco) However, according to public reports that were obtained, TGP reported that 632 pounds of VOCs were released, during this incident, due to a faulty processor card. (Allesio, Teshima, Ruga, DiFalco) This is very concerning and demonstrates the risks associated with this project and that this company cannot be trusted with peoples' lives. (Glick, Dieterich)
Comment: I think it's very troubling that the Wantage compressor has had these harmful effects on the residents and the environment, and that TGP did not notify or have any contact with the affected residents, leaving them in the dark about what was going on. (Stevenson)
Comment: How is the DEP prepared to respond if another incident, like the one that occurred on January 1, 2022, occurs from a station with 3 times the capacity of this one. (DiFalco)

Response: Blowdowns are regulated by N.J.A.C. 7:27-16.21 and those requirements have been included in the compliance plan under IS18 "Pipeline Venting (TXS < 0.1 lb/hr)" (see response to comment A-13). If the facility complies with those requirements, the NJDEP does not have a basis on which to deny the permit consistent with N.J.A.C. 7:27-22.3(cc).

TGP provided the following statement regarding the blowdown:
On January 1, 2022, at 10:56 am EST, a major processor (CPU) failure occurred on one of the existing compressor units at CS325. The safety features of the compressor unit operated as designed and intended, and the compressor vent opened which vented gas from the compressor unit in a controlled manner into the atmosphere. This resulted in an alarm on the station's monitoring system in the control room. Tennessee personal were then dispatched to the site to evaluate and secure the site and to ensure safety. They manually closed the suction and discharge valves of the compressor unit at 12:10 pm EST, which stopped the venting of natural gas.

Following the incident, Tennessee conducted a comprehensive investigation in collaboration with the compressor turbine vendor, and subsequently has enhanced its existing routine maintenance process to include additional components and wiring to minimize the chances of such events.

The January 1, 2022 event was reported on a timely basis, by January 5, 2022, to the USDOT and the National Response Center (NRC), which is a part of the National Response System and staffed by U.S. Coast Guard. Although the quantity of natural gas released was below the Department's notification threshold, Tennessee provided the Department with a courtesy notification on January 1, 2022.

Further, in accordance with protocols established by Tennessee with the Township of Wantage, Tennessee notified the township officials of the event by January 5, 2022. The first responders (local fire and police departments) were not notified, in this case, since first responders were aware of the event and arrived at the facility within less than one hour of the event. Tennessee land representatives attempted to contact landowners that abut CS325 through January 7, 2022 to discuss the incident.

4. **One commenter described his experience of the Pipeline Inspection Gauge (PIG) retrieval event that occurred on April 19, 2018 and proposed some actions that TGP should take, in order to compensate him (and his neighbors) for their troubles.**
Comment: I live about 2000 feet from the transfer station. On April 19, 2018, the station released natural gas during a PIG retrieval event around 11:00 am. I'd lived there for 5 years and was comfortable with the operation until that event. On April 20th, my wife and I both slept until 8:59am, sleeping through my alarms and missing work. My kids, who went to bed at 8pm, didn't wake up until 9am when I woke them up to make sure they were still alive. My 3-month-old son NEVER sleeps through the night. My 2 dogs, who normally bark nonstop to go out at 4:30am, didn't bark at all. My entire home was filled with gas from basement to attic as were my vehicles which were parked outside. While coping with dizziness and a headache, I drove my family down to Bloomfield, NJ to stay at

another home. I then returned to our house and opened every window and door in the house to get rid of the gas smell which took 3 hours. I had to use 5 extra bags of pellet fuel that day because the outdoor temperature was 37 degrees Fahrenheit. (Stauss, F&WW)
Comment: The Sussex / Wantage school system complained about the natural gas smell also. (Stauss, F&WW)
Comment: In the future, I think Tennessee Natural Gas Co. needs to understand the impacts upon human life and the people their transfer stations are affecting. I would expect a company such as this to fully understand how to service the transfer lines and at least warn the surrounding community when servicing is expected. Better yet, when servicing is performed, the escaping gas should be captured and distributed to the nearby community for free, as compensation for enduring the transfer station anomalies. The residents of my block all have propane and would welcome TGP's initiated project to supply us with natural gas for free or at a steeply discounted rate. (Stauss, F&WW)
Comment: In addition to calling several agencies and organizations regarding this occurrence, the commenter called 2 Kinder Morgan employees and sent a follow up email to one of those employees on April 23, 2018. The email requested reimbursement of several expenses that he incurred as a result of this incidence as well as for Kinder Morgen to provide a means of detecting the quantity of combustible gas in the air in his home at all times. The commenter states that, as of August 7, 2022, these reimbursements were not made. (Stauss, F&WW)

Response: The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit is limited to the addition of one natural gas-fired combustion turbine, one natural gas-fired boiler, one natural gas-fired emergency generator, one pipeline liquids storage tank, and other ancillary equipment at a single facility located in Sussex County, New Jersey. Pipeline inspection gauge retrievals is an insignificant source (IS12 in the permit), which is subject to the permit conditions listed in the IS12 section of the compliance plan. If the facility complies with those requirements, the NJDEP does not have a basis on which to deny the permit consistent with N.J.A.C. 7:27-22.3(cc).

5. **Comment:** This project is not about maintenance. TGP wants to triple the amount of gas moving through that pipeline and that is dangerous. (Scanlan, Keida) TGP has applied for permits to triple the size of the Wantage compressor station and build a new compressor station in West Milford to force higher volumes of fracked gas through a 65-year-old pipeline to New York. This plan would put our climate at greater risk, put local residents in danger from harmful accidents and exposes them to toxic air pollution. (Jackson, Aquino, F&WW)

   Response: The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be

negligible (see response to comment B-1). Therefore, the NJDEP does not have a basis on which to deny the permit consistent with N.J.A.C. 7:27-22.3(cc).

6. **Several commenters are concerned about the TGP 300-line pipeline explosion that occurred on July 7th, in Clermont, PA (McKean County) causing a fire that burned through 5 acres before it could be contained. (Scanlan, Allessio, Teshima, DiFalco, F&WW, Wood) These commenters are also concerned that this could happen in New Jersey.**
Comment: Residents of the Highlands are concerned that this could happen in New Jersey. Imagine an explosion or fire in that region with all of the state forests. (Allessio).
Comment: The 300-line pipeline in Clermont has 2 pipelines running side by side and there is a newer, 10-year-old gas compressor station that was installed to increase the pressure in the line, just like this project plans to do in Wantage. TGP has said that it was line 1 (a 24-inch pipeline) that exploded but line 2 is still functional. I think line 2 is probably the newer 30-inch pipeline that was installed about 10 years ago when the compressor station was upgraded and TGP doesn't want this information known because it predicts what will happen in Wantage. (Wood)
Comment: There are dangerous safety risks associated with forcing higher volumes of gas through a 65 plus year old pipeline system, as was illustrated by last week's explosion in McKean County, PA on a western portion of TGPs operations. (Voos, DiFalco, F&WW)
Comment: Fracked methane gas and its accompanying VOCs are highly flammable. A spark from a storm or an electric line could ignite it. The resulting fire could quickly become uncontrollable in West Milford's dense, old growth forests. And the likelihood of a lightning storm occurring in West Milford is increasing in recent years due to global warming. (Wood)

Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. Pipeline explosions and resulting fires are beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application.

The USDOT pipeline safety regulations found at 49 CFR Part 192 are intended to ensure adequate protection of the public from natural gas pipeline system failures by specifying design and construction requirements, liquid removal, emergency shutdown procedures, pressure limiting devices, additional safety equipment, and ventilation requirements for compressor station facilities. The design, construction, operation, and maintenance activities for the project facilities must comply with USDOT's regulations to be approved by FERC. See sections 11.2 and 11.3 of Resource Report 11, submitted to FERC, as part of TGP's certificate application for the project, for additional information (https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20200630-5546).

TGP provided the following information:
Tennessee's integrity program exists specifically to identify and mitigate all pipeline integrity issues. As explained in Resource Report 11, Tennessee's pipeline system, including the facilities located in the state of New Jersey, includes pipeline design and equipment features that are designed to increase the overall safety of the pipeline system and protect the public from any system failures due to operations,

incidents, or natural catastrophes. These features include routine inspection and maintenance programs as well as equipment design.

The July 12, 2022, pipeline incident occurred in a rural area of western Pennsylvania. The investigation of this incident has been completed, and the Root Cause Analysis Report resulting from that investigation was submitted to the USDOT. Currently, Tennessee is operating the line section where the incident occurred under a self-imposed pressure restriction and will continue to do so until it has completed any necessary repairs. Tennessee will continue to provide USDOT with updated information regarding its progress in this regard.

7. **Several commenters question how safe the pipeline will be after this project increases the internal gas pressure within the pipeline, portions of which are over 65 years old, and the typical life span of steel pipe is about 50 years.**
Comment: Portions of this pipeline were built more than 65 years ago. (Scanlan, Rapaport, Clarke, Allessio, Teshima, F&WW, Wood) The average useful life span of steel pipes is 50 years. (Sellen, DiFalco, F&WW, Clarke, Allessio, Wood)
Comment: The 67-year-old pipeline must be presumed to be unsafe, due to its age. Projects such as the old pipeline are supposed to be decommissioned after they reach their life expectancy, to assure the safety of the public and the lands. You don't try to make the old pipeline last longer, putting everyone's health and lives at risk. The only time TGP replaces a pipeline is if they find a leak in it. By that time, it's too late, the toxins have already been released into the atmosphere, water, and soil and have already done their harm. The pro-active thing to do would be to decommission all sections of the pipeline well before they reach their breaching point. (Wood)
Comment: The pipeline is composed of steel pipes in the damp ground. Steel rusts - the pipeline will corrode and leak; pitting and scaling will decrease the pipe wall thickness, creating weak points and holes; with age, welded seams crack, allowing gas to escape. I believe that is why the explosion in Clermont, PA occurred. You must require TGP to fully inspect each section of pipe to make sure the entire length is still intact. (Wood)
Comment: Adding more compressor stations will increase the pressure inside the pipes, it was not originally designed to withstand that amount of pressure. Pipeline corrosion amplifies the dangers of increasing the pressure within the pipeline. Pressurized gas is hard to contain, it will escape through every pinhole and crack. Do not allow pressure increases in a 67-year-old pipeline. (Wood)
Comment: There is a large concern that when these compressor stations increase the pressure and volume of gas in these pipelines, that are more than 65 years old, and which have never been subject to this higher pressure before, it will increase the risk of dangerous gas leaks and explosions in our community, putting countless neighborhoods at greater risk. (Sellen, DiFalco Ebbinkhuysen, F&WW, Teshima)
Comment: Decommission the 67-year-old pipeline completely, leaving only the new pipeline to be used. Then, there will be no need for the new compressor stations, the existing compressor station will be sufficient to push the gas through the single newer pipeline. (Wood)

Comment: Due to their age, these pipelines may need to all be dug up again and replaced at some point. Old pipelines are often faulty and leak, polluting the land water and air around them. (Clarke)
Comment: Old pipelines leak VOCs and Methane, a pollutant and greenhouse gas, all of the time. (Allessio, Burgi) They can be detected by satellites in the sky. (Allessio)
Comment: TGP doesn't have the best safety record. (Gorman, Allessio, F&WW)

Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The integrity of the pipeline and the typical lifespan of the pipeline are beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application. The USDOT establishes pipeline safety standards for the safe operation and maintenance of natural gas pipelines. FERC ensures that the proposed plan complies with these requirements before approving the project.

TGP provided the following information in response to this comment:
The assertion that the typical lifespan of the pipeline is 50 years is incorrect. Tennessee operates, monitors, and maintains its pipeline in accordance with the United States Department of Transportation's ("USDOT") Pipeline and Hazardous Materials Safety Administration ("PHMSA") pipeline safety standards which are codified in 49 CFR Part 192 et seq. Pursuant to the Pipeline Safety Act, 49 U.S.C. §60101, et seq., the USDOT and PHMSA have exclusive jurisdiction over Tennessee with regard to the safety standards that apply to the design, installation, inspection, emergency plans and procedures, testing, construction, operation, and maintenance of Tennessee's pipeline facilities.

Tennessee has existing safety and integrity plans that it implements on an ongoing basis for its pipeline system. The pipeline is not beyond its lifespan and the FERC staff noted in the Project Final Environmental Impact Statement (FEIS) that "Tennessee's existing pipeline system, including its existing 300 Line, is already designed to safely handle the additional gas volumes that would be transported through Tennessee's pipeline system by the Project, and Tennessee would not increase the maximum allowable operating pressure within the 300 Line system." FEIS at p. 51.

D) Environmental Issues / Environmental Justice

1. **Several commenters are concerned about the effect that this project will have on the environment.**
   Comment: Thousands of people come to the Monksville Reservoir to enjoy the beautiful lakes, rivers and forests of the highlands. Milford, Wantage and the surrounding areas are some of the most pristine and beautiful parts of our state. (Bijlani, Parlgreco F&WW)
   Comment: In order to build the pipeline, trees will need to be cut down. It will damage the natural greenery that people of New Jersey love, cherish and pay a lot of property taxes for. (A. Noel)
   Comment: What we most need on this earth, we already have. However, the industrial society is destroying those things. (Owl)
   Comment: Leaks or explosions would create lasting damage to the environment for generations to come. (Sellen, F&WW)
   Comment: The facts speak for themselves; we all know fracking is bad for the environment. (O'Hagan)

   Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The effects on the reservoir and trees are beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application. The USDOT establishes pipeline safety standards for the safe operation and maintenance of natural gas pipelines. FERC ensures that the proposed plan complies with these requirements before approving the project.

   The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

2. **Several commenters are concerned about the environmental track record of TGP. Many commentors specifically highlighted environmental damage that occurred during the last 300-line upgrade which occurred around 2011.**
   Comment: According to the pipeline and Hazardous Materials Safety Administration reports from 2006 to 2017, TGP has 111 significant incidents with their pipelines, resulting in 89.8 million dollars in property damage and 19 federal enforcement actions. (Scanlan, Allessio, Burgi, DiFalco, Jackson, Aquino, F&WW)
   Comment: Eleven years ago, TGP seriously damaged 2 lakes (Lake Lookover and Bearfort Waters in Hewitt, West Milford) by causing siltation, mudslides, increasing flooding and impacts on drinking water wells. After clearcutting huge swaths of land along their pipeline right of way in Wantage, Vernon, West Milford, and Ringwood, TGP failed to replant the forested areas they were required to as part of their remediation plan. NJDEP had to fine TGP $175,000 for not planting the required trees. The required annual reports stopped after the first year. (Clarke, Ruga, Scanlan, Allessio, Burgi, DiFalco, McFarland, Ramos, Jackson, Aquino, F&WW, Teshima, Voos)

Comment: Since this project, VOCs have been documented on the pipeline right of way by the Vernon Environmental Commission. (McFarland, Ramos)
Comment: TGP promises, in the environmental assessment, to protect wetlands and water by restoring the wetland contours to pre-construction conditions to the extent practicable upon completion of construction but we cannot trust them to do a full and honorable restoration of the affected environment. (Clarke, F&WW) After all these years, TGP has not remediated the damage done in 2011. (Teshima, F&WW, Voos)
Comment: We can't trust TGP to avoid polluting our air and the water supply. Paying fines will be cheaper for them. (F&WW)
Comment: TGP is a well-known out of state polluter with a poor record of managing and tracking gas assets. With this record, how can NJDEP put New Jersey residents and our environment at further risk by allowing this company back into our communities. (Allessio, Burgi, DiFalco, Jackson, Aquino, F&WW, Scanlan)
Comment: TGP chose the least effective and most inexpensive way to do carbon offsets – by planting trees; even then they didn't complete the minimum required tree plantings. Furthermore, planting one species of tree does not address the problem of biodiverse habitats that they destroy as they build these pipelines. (F&WW)
Comment: TGP must be made to fulfill previous commitments to remediate the damage caused in NJ, such as tree planting that was not done. (F&WW)

Response: The scope of the NJDEP's review and approval of an application for a modification to an Air Pollution Control Operating Permit for these activities does not include factors such as the environmental record of the facility regarding matters other than air pollution. However, TGP provided the following to address the comment:

Tennessee obtained all necessary environmental approvals and permits and satisfied all restoration and mitigation obligations imposed by the Federal Energy Regulatory Commission (FERC) and the Department for the 300 Line Project.

Tennessee's 300 Line Project did not cause serious damage to Lake Lookover and Bearfort Waters through siltation, nor did that project cause mudslides, increase flooding or impact drinking water wells. As part of Tennessee's 300 Line Project, Tennessee installed a 30-inch diameter pipeline loop parallel and adjacent to its existing 24-inch diameter pipeline across Bearfort Waters Lake in West Milford, New Jersey. Bearfort Waters Lake is upstream of Lake Lookover, Mount Laurel Lake, and Upper Greenwood Lake. Tennessee took significant measures during construction of the 300 Line Project to prevent sedimentation from entering the lower lakes, including installing and maintaining erosion control devices (ECDs) around the crossing of Bearfort Waters Lake. Tennessee received all necessary approvals from the FERC and the Hudson Essex Passaic Soil Conservation District for its soil erosion and sediment control plans.

Numerous significant and unusual rain events, including Hurricane Irene, that occurred throughout 2011 overwhelmed ECDs at times, which caused turbid water to enter the lakes downstream of Bearfort Waters Lake on occasion. While Tennessee's construction had a minor, temporary impact on the lower lakes, there were no long-term impacts to Bearfort Waters Lake or to Lake Lookover and the other downstream lakes.

The FERC found that Tennessee complied with all mitigation and restoration activities in the vicinity of Bearfort Waters Lake. In March 2012, FERC staff inspected the restoration and stabilization of the 300 Line Project right-of-way in the immediate area of Bearfort Waters. The inspection found no instances of noncompliance or problem areas. The report documenting the inspection noted that the banks at the pipeline crossing location and the adjacent pipeline right-of-way were stable. Also, there was no visible turbidity at Bearfort Waters or Lake Lookover at the time of the inspection. Photographs of the two waterbodies were included as part of the inspection report (copy available upon request).

Tennessee submitted all reports required by the FERC and the Department and met all restoration and mitigation obligations imposed by the FERC and the Department for the 300 Line Project.

Tennessee is aware of the Vernon Township Environmental Commission's (Commission) concerns raised in late 2011 regarding an alleged observance of an "oily sheen" on the construction right-of-way in connection with Tennessee's 300 Line Project. Tennessee addressed the Commission's concerns by retaining a third-party consultant who determined, through sampling and testing, that the levels of a VOC, toluene, at sample locations ranged from undetected to less than one third of the Department's maximum contaminant level of 1,000 µg/l. By letter dated February 6, 2012, Tennessee provided the Commission with the sampling results and informed the Commission that the "oily sheen" was likely due to a naturally occurring iron-related bacteria that was identified in the samples.

3. **Several commenters are concerned about what affect this project will have on water quality.**
Comment: There is a significant amount of water pollution that results from the process of constructing and operating a compressor station. (Gorman, Blaeuer, McFarland, Ramos) The use of hazardous chemicals and runoff from construction could impact groundwater. (McFarland, Ramos)
Comment: I'm concerned that the leakage of chemicals and other things could hurt our water supply even more than it has already been. (Rapaport)
Comment: This expansion could lead to carcinogens being released into the Wanaque and Monksville reservoirs which could greatly increase the risk of cancer to over 3.5 million residents, who get their drinking water from these reservoirs. (F&WW)
Comment: Millions of people rely on the Highlands region as a source of drinking water. Water is trucked from Somerset County to South Jersey due to annual water shortages. The pipeline will pollute the wells and lakes. (Bijlani, Parlgreco F&WW, K. Noel)
Comment: The proposed West Milford compressor station would be only 1,200 feet from the Monksville reservoir which provides drinking water to 3.5 million people and only 150 feet from

tributaries that flow into that reservoir. Contamination of the reservoir would be disastrous. (Allessio, Clarke, F&WW)
Comment: The West Milford compressor has the potential to pollute drinking water for over 3.5 million NJ residents due to its location near the Highlands Preserve, right next to a C1 stream and above the Wanaque and Monksville reservoirs as well as near underground aquafers. (Sellen, F&WW)
Comment: The West Milford site is a stone's throw away from Greenwood Lake and the Monksville and Wanaque Reservoirs. (F&WW)
Comment: New Jersey enjoys high-quality, low-cost drinking water because of the abundance of water in this region. We do not have an alternative supply and the cost to remediate would be astronomical. (F&WW)

Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The effect on drinking water and lakes is beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application. FERC is tasked with ensuring that appropriate plans are in place and implemented, to prevent compounds from entering ground water during construction, operation, and maintenance activities. (See responses to comments C-1 and D-2).

The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit for CS325 in Wantage, NJ. The application before the NJDEP does not include the proposed compressor station in West Milford, NJ (CS327) which is part of the East 300 Project but is not a part of CS325.

4. **Several commenters are concerned that New Jersey is a small, densely populated state which already bears the burden of many environmental problems; they believe this project will add to those burdens as well as jeopardizing the safety of the residents.**
Comment: New Jersey is a densely populated, polluted state, we cannot afford to take risks to our environment, especially not to further the climate destroying fossil fuel industry. (F&WW)
Comment: Our state is too small and too densely populated for this project. An accident of any kind would more than likely be catastrophic to NJ citizens. (F&WW)
Comment: How can we possibly justify this project when New Jersey already has over 1500 miles of pipelines, although it is 47th in size and 1st in population density. (F&WW)
Comment: New Jersey is already the home of the largest number of superfund sites in the country, we don't need any more. (F&WW)
Comment: New Jersey has some of the worst air and water in the country; we need to preserve our land and we need infrastructure for renewables, not pipelines. (F&WW)
Comment: New Jersey is almost famous for its bad air. It's a wonder that we are considering adding more fossil fuels when fossil fuels are the reason that the air is so bad in the first place. (Madison)
Comment: I can only open my windows for a minute or two due to poor air quality; you leave me no choice but to leave New Jersey and seek refuge where there is at least moderately clean air. But there

will be no escape if other states continue using fossil fuels as the primary energy source. What has always been called the "garden state" is becoming the "garbage state" due to foul air. (F&WW)
Comment: New Jersey is among the three fastest overheating states in the US with high rates of asthmas, cancer, and lung disease. (F&WW)
Comment: New Jersey is the fastest warming state in the country (Allessio, Powell, Rye, DiFalco) and is already facing worsening impacts of climate change. (Allessio, Powell, DiFalco)

Response:
The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. If the facility complies with those requirements, the NJDEP does not have a basis on which to deny the permit consistent with N.J.A.C. 7:27-22.3(cc).

Environmental burdens that are not caused by or under the control of the facility, in this case, CS325, are beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application.

5. **Several commenters questioned how this project could be approved when the Highlands Water Protection and Planning Act was passed in 2004 to protect the Highlands by regulating development in that region.**
Comment: The Highlands Act was created to protect the clean environment of the Highlands and to protect the drinking water for so many New Jerseyans throughout the state. We should not allow a corporation with a very poor track record of taking care of the environment to construct anything more in this area. (F&WW)
Comment: The compressor site is one of the last areas in New Jersey that is still green and protected by law (the Highlands Act). The compressor expansion is not in line with the Highlands Act's spirit to protect the Highlands. (K. Noel)
Comment: The spirit of the Highlands Act must be followed, and no economic expansion must be granted. The increased risk for serious pollution is undoubtedly there. (Dieterich)
Comment: I cannot understand why the West Milford Compressor Station project, with the risk to pollute a major public drinking water source, can find your approval, particularly when the Highlands Act was put in place to protect our NJ water sources. (F&WW)
Comment: Jeff Tittel, who helped write the Highlands Act, told us that the intent of the reference to "utilities" (in the Highlands Act) was to provide electrical power to local residents. (Wood)
Comment: This project will make a mockery of the Highlands Act by destroying the reservoir system. (F&WW)
Comment: With this project being located in the Highlands Forest, these aging pipelines present a significant potential for fire damage, major leaks or damage from explosions. Forests take an average of 100 years to grow back to a healthy, natural, uncorrupted state. We do not want to lose the integrity of our natural resources in the highlands or the limited remaining contiguous forest to this risky project. (Clarke, F&WW)

Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The Highlands Act is beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application.

The Highlands Council did not raise any objections to the proposed project.

The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit for CS325 in Wantage, NJ. The application before the NJDEP does not include the proposed compressor station in West Milford, NJ (CS327) which is part of the East 300 Project but is not a part of CS325. While CS327 is within the bounds of the Highlands area, CS325 is outside of the Highlands area.

6. **Some commenters are concerned about the effect this project will have on New Jersey residents, particularly those in environmental justice communities.**
Comment: If the state of New Jersey does not stop new fossil fuel infrastructure (pipelines, gas fired energy plants and compressor stations) then you won't be able to protect Environmental Justice communities from the pollutants of these greenhouse gasses which are not only health and safety risks but also cause climate change. The state of New Jersey needs to reduce our fossil fuel consumption in order to protect all New Jersey residents but especially Environmental Justice communities. (Allessio (LATE))
Comment: It is inequitable and unjust to put any NJ community at risk of health issues or even death because of the expansion of these projects. When Governor Murphy took office, he pledged to fight for environmental justice and against climate change. Both of these projects would be massive steps backwards in those regards. (F&WW)
Comment: I am extremely concerned about the compressor station expansion in Wantage and the negative effects on New Jersey residents. (B. Kessler, F&WW)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. If the facility complies with those requirements, the NJDEP does not have a basis on which to deny the permit consistent with N.J.A.C. 7:27-22.3(cc).

The Wantage compressor station, CS325, is not located in an environmental justice area.

See response to comment D-5, regarding the scope of the application under review, which does not include CS327.

7. **Several commenters are concerned about the pollution that would be emitted as a result of this project; others believe that we need to protect and preserve the planet for future generations.**

Comment: The decisions that we make in the coming years will impact us and future generations for their lifetimes. (Clarke)
Comment: We have a duty to protect future generations by protecting this beautiful world that we live in so that the earth that we leave for our children is livable. This earth is all that we have, we can't go anywhere else. (T. Israel, F&WW)
Comment: We need to ensure a stable climate and economic future for New Jersey. (Blaeuer)
Comment: I don't want to see health hazards and health decline for the next 100 years. (Coffin)
Comment: If we continue to destroy nature, we are just going to destroy ourselves. (Martine)
Comment: Environmental issues are of great importance to me. I think it should be first on our list. (Neustadter)
Comment: The compressor proposed would emit harmful pollutants either leaked from the site or from venting (blowdowns). (Rogovin)
Comment: Once the job is over, the residents are the ones left with TGP and their pollution factories. Gas compression stations are known to be air and water pollution factories. (Keida)

Response: The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed.

Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

The operating permit contains emission limits and operating requirements, along with monitoring and recordkeeping requirements to ensure compliance. In addition, the NJDEP will conduct a compliance inspection at the facility on a routine basis. If the facility violates these requirements, it is subject to monetary penalties or other enforcement action pursuant to N.J.A.C. 7:27A-3.

See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

E) Permit

1. **Comment:** One commenter stated that to this day, TGP does not have its air quality permit and it burns every day, polluting all of you. (Martine)

   Response: TGP's Wantage compressor station is currently subject to the Air Pollution Control Operating permit BOP210001. While this permit is expired, the facility is operating under a permit application shield, pursuant to N.J.A.C. 7:27-22.7, that is in place because the facility submitted a timely and complete operating permit renewal application. This application shield allows the facility to continue to operate in compliance with the expired permit until the NJDEP takes final action on the pending operating permit renewal application.

2. **Some commenters are concerned that the operating permit does not include all potential methane emissions.**
   Comment: There are no fugitive emissions (non-source and insignificant source) listed in the draft permit. The emissions of blowdowns are not included in the air pollution control permit, not even the scheduled ones. Most of the time, the highest contribution to methane emissions will be the uncontrolled fugitive emissions. (Ramos)
   Comment: Blowdown emissions are not accounted for in your analysis and therefore, it underestimates the total potential to emit for methane, volatile organic compounds (VOCs), and dangerous toxic air pollutants. (Ramos, Gorman, McFarland)
   Comment: The Statement of Basis lists the facility with a methane potential to emit of 418 tpy but the draft permit does not reflect the remaining 415 tpy of methane. (Ramos)

   Response: Emissions from Fugitive Sources and Insignificant Sources are given in the emission table for each of those categories in the draft permit. There is a table of emissions for "Non-Source Fugitive Emissions" and a table of emissions for "Insignificant Source Emissions". However, these tables only list criteria pollutants, HAPS, and "other" emissions. Since it is not specifically listed in the table, Methane is included in the "other" emissions column. However, the "other" emissions from Fugitive and Insignificant Sources were not included in the "Other Air Contaminant" table (Table 4 in section A of the draft operating permit), which lists the individual pollutants that are included in the "other" pollutant category for Significant Source Operations. Table 5 has been added to Section A of the Operating Permit to include "Other Air Contaminant" emissions for insignificant sources, which consist of 415 tons per year of methane. This is consistent with the information presented in the permit and the Statement of Basis.

3. **Some commenters are concerned that TGP is not reporting all their emissions.**
   Comment: Requiring companies to "self-report" emissions will inevitably result in underreporting of emissions. (Allessio, DiFalco)

Comment: One commenter states that TGP calculations for fugitives and venting are based on natural gas being 96.12% methane and methane equivalent is adjusted to carbon dioxide by dividing the methane composition in the natural gas by 25. (Frost)
Comment: The pipeline company is not required to report to the local community even if there is a large blow out of gas, such as what happened on January 1, 2022. (Allessio, DiFalco)
Comment: The regulatory definition of "blowdown event" only requires the reporting of "non-emergency" events and the emissions of VOCs when exceeding the reporting threshold of 2,000 pounds (1 ton). One ton of VOCs is an incredibly high number, especially when the entire facility has the potential to emit 38.5 tons per year of VOCs. (Ramos)

Response: The facility is required to coordinate mutual assistance with first responders, public officials, and local utilities, in responding to emergencies (see response to comment C-1)

Insignificant Source emissions are required to be reported in the facility's annual emission statement.

As referenced by the commenter, N.J.A.C. 7:27-16.21(c) requires a facility to report all "blowdown events", on or before March 1st of each year; where a "blowdown event" is defined as the non-emergency release of natural gas from a pipeline for the purpose of inspection, maintenance, or repair and where, in the absence of control, more than 2,000 pounds of VOC could be released to the atmosphere. See response to comment A-13, regarding blowdown regulations.

4. **Comment:** TGP has been substantially understating the annual emissions that it posted to NJDEP Dataminer as emissions from CS325 for the past 10 years by not including venting emissions which is impossible and directly contradicts TGP's FERC application where TGP states it will be performing venting routinely every year. TGP's understated emission values have skewed New Jersey GHG inventory data to appear lower than it actually is. Not tracking the actual emissions would mean that New Jersey might arrive at 50% of natural gas emissions, based on 2006, only on paper, but not in reality. (Frost, DiFalco)

   Response: The NJDEP Bureau of Stationary Sources acknowledges the comment about underreporting methane emissions. This issue has been referred to NJDEP Air Compliance and Enforcement for review.

5. **One commenter states that there are striking inconsistencies in the data that TGP provided to NJDEP in its permit application, which is the basis of the proposed operating permit.** (Frost)
   Comment: TGP is not using industry standards to estimate the Solar Titan 130 emissions. There are many other natural gas transmission projects that utilize a Solar Titan 130 turbine at a compressor station facility. Even in its FERC application, TGP provides much lower numbers than all other natural gas companies using the same turbine. Many other companies report well over 2 tons of combustion methane emissions in their FERC application, TGP reports 2 tons in their FERC application, and TGPs permit application claims 3 tons of emissions overall from all three turbines. (Frost)

Comment: One commenter states that TGP's 2 existing Solar Taurus 70 turbines emit substantially more methane every year than what TGP submitted in the air permit application (Frost)
Combustion Methane Emissions: TGP reported less than 1 tpy of methane in 2011, 2012 and 2013 and less than 1.5 tpy for years 2014 through 2021. At peak efficiency, the methane emissions for 1 Solar Taurus 70 turbine is 3.56 tpy. The Transcontinental Regional Energy Access Expansion Project originally planned for a Solar Taurus 70 turbine at the CS-201 station and combustion methane emission was estimated to be 10.72 tpy. (Frost)
Total Methane Emissions: Based on technical specifications provided by TGP in their FERC application to add 2 Solar Taurus 70 turbines to CS325, methane emissions should be close to 600tpy based on loading and operating hours. This includes 239 tpy of fugitive methane emissions and 115 tpy of venting emissions. (Frost)
Comment: One commenter states that data, in TGPs FERC application, for the (2) existing Solar Taurus 70 units and the existing backup generator has been reduced down to an impossible emission amount for 1) Combustion methane emissions, 2) Fugitive methane emissions, and 3) Venting methane emissions. (Frost)
Comment: How does adding a 3rd turbine unit Solar Titan 130 reduce the overall venting of the facility? (Frost)

Response: The methane emission factor that was assumed for each project has the most significant effect on the methane emissions estimated for each project. TGP used an emission factor of 0.002 lb CH4/MMBtu obtained from (EPA's Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98). It appears that a methane emission factor of 0.017 lb CH4/MMBtu was used for the Equitrans proposed project. Additionally, the proposed Equitrans emissions would be higher because the horsepower of the Equitrans turbine is 17% higher (23,497 bhp versus 20,500 bhp for the TGP Titan 130) and the heat input of the Equitrans turbine is 16% higher (183.42 MMBtu/hr – HHV vs. 158.4 MMBtu/hr-HHV).

The 3.56 tons/year methane potential to emit ("PTE") estimate for a single Taurus 70 turbine was taken from Resource Report 9 for TGP's 300 Line Project, which was prepared in July 2009 for the FERC and is based on EPA's AP-42 5th Edition, Volume I, Chapter 3, Table 3.1-2a (dated 4/00) methane emission factor of 0.0086 lb CH_4/MMBtu. The pending application uses the methane emission factor prescribed by 40 CFR Part 98 to estimate the turbine's PTE. The PTE for each Taurus 70 turbine, in the draft permit, is 0.769 tons/year of methane from combustion (based on year-round operation), which results in a combined total methane PTE from both Taurus 70 turbines of 1.54 tons/year. This value is in the range of the actual methane emissions reported, in recent years, in TGP's emission statements, which is also estimated based on the methane emission factor prescribed by 40 CFR Part 98. The NJDEP's proposed Air Pollution Control Operating Permit Renewal and Permit Modification for CS325 is based on current information (including emission factors) provided by TGP in the pending permit application for the East 300 Project.

The 10.72 tons/year methane emission estimate that the commenter cites for Transco's CS-201 was taken from the draft Resource Report 9 for Transco's Regional Energy Access Expansion Project that

was prepared in July 2020 for FERC. It appears that this annual emission estimate is based on a methane emission rate of 2.33 lb/hr. As noted above, the emission limits for TGP's CS325 Taurus 70 turbines are based on an emission factor of 0.002 lb CH_4/MMBtu from 40 CFR Part 98, which equates to an emission rate of 0.209 lbs/hr.

6. **Some commenters believe that, if CS327 is going to be built and operated, TGP should be required to get an operating permit for it first.**
Comment: Weak state regulations do not require an air permit for the West Milford facility. Even electric compressor stations emit toxic fumes when there is a scheduled or unplanned blowdown. (Allessio, Frost)
Comment: One commenter states that the actual methane emissions from CS327 are 142 tons per year. These emissions will not be included in EPA or NJDEPs GHG inventory because CS327 does not require a permit. TGP should be required to submit an air permit application for this source and the emissions from it should be included in the inventories. (Frost)
Comment: CS327 exceeds the benzene monitoring level as well as the methane level. (Frost)

Response: The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit for CS325 in Wantage, NJ. The application before the NJDEP does not include the proposed compressor station in West Milford, NJ (CS327) which is part of the East 300 Project but is not a part of CS325 (see response to comment D-5).

If CS327 is subject to N.J.A.C. 7:27-22, TGP must obtain an operating permit for that facility. The applicability requirements are located at N.J.A.C. 7:27-22.2.

7. **Commenters suggested several things that should be done before the NJDEP approves this permit.**
Comment: This operating permit should not be approved until a full actual assessment of the existing turbines and a full analysis of the proposed turbine, in operation at other existing facilities, is completed. (Frost)
Comment: There has been no study or meaningful discussion from the DEP, regarding operational safety and the risk of leaks and explosions along this line due to increased pressures on the aging pipes. The DEP must review the safety of increasing pressure into pipes that are well past the average useful life of steel pipelines before deciding on whether to issue a permit that will allow this project to move ahead. (Allessio, DiFalco)
Comment: A spill of hazardous materials stored onsite or during construction could be detrimental to the water supply of millions of NJ residents. The DEP must do a study to determine the risks associated with allowing a major industrial facility so close to one of NJ's largest reservoir systems. (Allessio)
Comment: Have there been any scientific studies about the need for this gas capacity? If not, will NJDEP call for one to be done before approving the project? (DiFalco)
Comment: Has NJDEP had any conversations with the New York Public Service Commission or New York Department of Environmental Compliance, regarding whether this project is actually needed? My

understanding is that it is not. Andrew Cuomo rejected the last pipeline that was supposed to go through New Jersey to New York because it wasn't needed. (DiFalco)
Comment: The DEP has recommended that new compressors be electric driven. The DEP made this recommendation to Williams which is proposing a similar pipeline expansion in Central Jersey and recommended that their West Deptford compressor be electric. (Allessio, DiFalco) Has the DEP recommended that the Wantage compressor be electric driven? If not, why not? (DiFalco)
Comment: Before considering this expansion, TGP should reduce emissions from their current site. (Dieterich)
Comment: If the measured or monitored emissions from the existing Wantage compressor station are not within the permit limits, the operating permit should not be approved. (Dieterich)
Comment: New Jersey has a lot of environmental restrictions that enable the state to maintain a healthy environment. I urge the DEP to make sure that, if this is passed, it is something that will not harm the environment or the citizens that live nearby. (Stevenson)

Response: The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

The operating permit contains emission limits and operating requirements, along with monitoring and recordkeeping requirements to ensure compliance. In addition, the NJDEP will conduct a compliance inspection at the facility on a routine basis. If the facility violates these requirements, it is subject to monetary penalties or other enforcement action pursuant to N.J.A.C. 7:27A-3.

This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The integrity of the pipeline, hazardous material management and need for additional gas capacity are issues that are beyond the scope of the NJDEP's authority regarding review of this air pollution control operating permit application. The USDOT establishes pipeline safety standards for the safe operation and maintenance of natural gas pipelines.

The NJDEP did inquire as to why TGP was not proposing an electric compressor engine for this project. TGP responded that an electric compressor engine is not feasible at this location. TGP's Environmental Report, Resource Report 10, Alternatives, that was submitted to FERC on June 30, 2020, in Docket No. CP20-493-000 discusses the reasons that they determined it to be infeasible.

The current Title V Operating Permit requires NOx and CO emissions from the two Solar Taurus 70 combustion turbines to be stack tested annually. The last stack test was performed on June 14, 2022, but the NJDEP has not completed its review of the test report to confirm compliance. The three most recent stack tests that have been reviewed by the NJDEP are TST210001 which was performed on July 1,

2021, TST200001 which was performed on June 9, 2020, and TST190001 which was performed on April 23, 2019. The stack test report for each of these tests demonstrates compliance with all Operating Permit emission limits including the New Source Performance Standards (NSPS) at 40 CFR 60 Subpart KKKK, which regulates stationary combustion turbines.

8. **One commenter believes that NJDEP should audit emissions from pipeline compressor facilities and fine them if the actual emissions exceed the permitted emissions.**
Comment: Facilities such as this should be audited, especially using a FLIR camera or as EPA refers to as Optical Gas Imaging (OGI) analysis for quantifying methane emissions. (Frost)
Comment: Facilities such as this should be fined for providing emissions that are less than their actual emissions. (Frost)

   Response: The permit has enforceable conditions requiring comprehensive stack tests and reporting initially, quarterly, and every permit renewal. The NJDEP will conduct a compliance inspection at the facility on a routine basis. In addition, the NJDEP reviews all compliance submittal requirements including annual compliance certification, semi-annual deviation report, and quarterly excess emission monitoring performance report to determine compliance. All inspection reports are available online and can be accessed by the general public using Data Miner found on the NJDEP's website at http://www.nj.gov/dep/. The permit has a 5-year term. Any deviations and exceedances to permit conditions will be addressed with the appropriate enforcement action that can include a modification to the existing permit. During the permit modification review, additional offsets and air pollution controls may be required if emissions are proposed to increase.

   This facility is subject to the New Source Performance Standards (NSPS) at 40 CFR 60 Subpart OOOOa. This regulation allows the option of using either optical gas imaging (OGI) or Method 21 of appendix A-7 of 40 CFR 60 to determine emissions. See response to comment A-12, regarding NSPS requirements.

9. **Comment:** Has the DEP done, or will they do, air sampling near the current Wantage Compressor station? If not, there should be constant air monitoring at that site. It is to cost prohibitive for nearby residents to install effective monitors on their properties. (Allessio) Ground water should be monitored as well because air contamination can settle onto the ground and make their way into reservoirs, lakes, ponds, and groundwater. (Allessio, DiFalco)

   Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. Water monitoring is beyond the scope of the NJDEP's authority regarding review of this air pollution control permit application.

   The nearest air monitoring station is located in Chester, NJ. The Prevention of Significant Deterioration (PSD) regulations (40 CFR 52. 21) require an air monitor for higher emitting facilities but not for facilities that emit at these levels.

10. **Some commenters believe that Governor Murphy should declare a moratorium on all new fossil fuel infrastructure while the State adopts new laws prohibiting such facilities.**
Comment: We demand that Governor Murphy declare moratorium on all new fossil fuel infrastructure. And instead, invest heavily in clean energy sources like solar, wind and geothermal. (Califf)
Comment: We have heard in the past that DEPs hands are tied because they must stick to their regulations and the regulations are weak enough to allow new gas projects such as this to be permitted. If Governor Murphy wanted to stop this project, he could issue a moratorium on such Title V approvals until new regulations are written that would not allow such projects to be permitted. (Dolsky)

    Response: The NJDEP's review of this permit application is limited to the scope of the application that is before it. In this case, the application for a modification of the Air Pollution Control Operating Permit is limited to the addition of one natural gas-fired combustion turbine, one natural gas-fired boiler, one natural gas-fired emergency generator, one pipeline liquids storage tank, and other ancillary equipment at a single facility located in Sussex County, New Jersey. Further, when issuing a new or modified Air Pollution Control Operating Permit, the NJDEP does not have the regulatory authority to declare a moratorium on all new fossil fuel infrastructure.

11. **Comment:** One commenter submitted an EPA question and answer document entitled "Counting GHG Fugitive Emissions in Permitting Applicability". This document explains the requirements of EPA regulations, describes EPA policies, and recommends procedures for permitting authorities to use to ensure that permitting decisions are consistent with applicable regulations. This document states, "For determining whether a source is a major source, the definitions of "major stationary source" and "major source" in the PSD and title V regulations, respectively, provide that fugitive emissions shall not be included unless the source belongs to one of the categories of sources specifically listed in the regulations. The commenter states that they do not understand the document and that it seems corrupt because the commenter believes that the most accurate numbers possible should be used to calculate emissions and that no pollutant should be exempt from regulation. (Wood)

    Response: The subject document was developed by the United States Environmental Protection Agency (USEPA). The NJDEP did not develop the document and has no authority to modify it.

    CS325 is a major Title V facility. The facility is currently well below the emission thresholds for determining if it is a major Prevention of Significant Deterioration (PSD) facility, which can only be applied to this source category if potential emissions of a criteria pollutant (NOx, CO, SO2, TSP, etc) exceeds 250 tons per year.

12. **Comment:** VOCs are a large group of chemicals that include toxic carcinogens like formaldehyde. Knowing the VOCs emissions from blowdown events, without an understanding of speciation does not inform the public or surrounding communities of the health impacts they could be exposed to as there is

no health factor associated with the VOCs. For example, Formaldehyde has 3 health factors: carcinogenic, long term non-cancer and short-term non-cancer. (Ramos)

Response: The NJDEP acknowledges that VOCs includes a wide variety of chemicals, including HAPs. Pursuant to subchapter 22, blowdown (venting) events are insignificant sources and therefore total HAP emissions from those events and other insignificant sources are listed in the insignificant source inventory as N.J.A.C. 7:27-22 does not require the permittee to speciate HAP emissions for insignificant sources.

F) Jobs

1. **Commenters state that the compressor station expansion project will provide good jobs for many people.**
   Comment: The TGP Project will provide jobs for many people, bring tax revenue into the state and local bodies, and leave homeowners better off. (Driscoll, Rodendough, Kubicka)
   Comment: The most important part about this project will be that it will be built by the very same people that will benefit from its long-term success. This project is going to be built by us and we are very professional about it because we must live with it after we are finished building it. (Kubicka DiPalma)
   Comment: The only people that support this expansion are the unions because it means jobs for them. I appreciate the work that the local unions do but the DEP is not here to provide jobs. (Keida)
   Comment: 90 percent of our members in this room (the operating engineers) are on our jobs. We don't need outside workers coming in, we do it ourselves. (B. Rocco)
   Comment: We had 140 local people working on the 2012 upgrades to the TGP pipeline. (J. Rocco)
   Comment: There is a lot of methane emitted from the Sussex County Landfill. But we are going to squash all these jobs because you guys don't want this going in. (B. Rocco)

   Response: The NJDEP acknowledges these comments.

2. **Some commenters argue that the compressor station expansion project will not create many (if any) permanent jobs for local residents. Other commenters state that union workers deserve safer and healthier jobs that will not harm the planet.**
   Comment: The jobs created by this project are only temporary, in order to build the compressor station. (Rogovin)
   Comment: There will be very few jobs for local people building these compressors. I stood outside a lot during the construction of the road land compressor station and the cars were from Texas, Arkansas, Missouri, Louisiana; They have specific people to build these compressor stations. (Glick)
   Comment: Not completing this project does not mean that there will be no jobs for union workers. We must not think that we need to choose between "work" and "the environment". (Stevenson)
   Comment: Union workers deserve long term, high paying, safer and healthier jobs in clean, renewable energy rather than a job that is destroying our planet. (Califf, Gay, Bijlani, T. Israel F&WW).
   Comment: We need a serious investment in retraining workers for clean energy jobs funded by the federal and state governments. (Califf) Let's start retraining these union workers today. (Cieri)

   Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The nature of the construction jobs and who fills them are outside the scope of the NJDEP's regulatory authority regarding review of this Air Pollution Control Permit application.

TGP is not preventing development of renewable energy. A diverse energy supply portfolio, including natural gas and renewables, is an effective hedge against the uncertainties and risks associated with energy generation.

See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

3. **Comment:** The New Jersey report project labor union makes a commitment to hire union and to hire 15% underserved environmental justice communities. That is a success for New Jersey. (Unidentified Speaker)

   Response: The NJDEP acknowledges this comment.

G) Other

1. **Several commentors requested changes to the public comment period and public hearing:**
   Comment: Several organizations requested a 60-day extension to the public comment period on the Draft Title V Operating Permit Renewal and Permit Modification for TGP which was originally scheduled to end on July 11, 2022. Stating that people should have adequate input on this permit for a facility that could severely impact air quality, risk public safety, and threaten our drinking water supply. Furthermore, the comment period is taking place during the summer, when residents typically take vacations so a longer comment period will make it easier for residents to comment. (McFarland)
   Comment: Several organizations requested that a virtual public hearing be held in addition to the in person public hearing that was scheduled for July 7, 2022, due to the uncertainty of COVID and health concerns, and because the public hearing was scheduled during the week of July 4th holiday. (McFarland)
   Comment: One commenter stated that she had a letter about a public hearing on the TGP Compression Station Plan for Wantage and Hewitt that said the public hearing would be held on July 7, 2022, at Sussex County Technical School, but the only information she could find points to a public hearing on August 4, 2022. The commenter requested confirmation of whether there will be a hearing on July 7, 2022. (Reider)
   Comment: One commenter requested verification that the hearing for the Air Pollution Control Operating Permit Renewal with Significant Modification, in Sparta, had been postponed from July 7, 2022, until August 4, 2022, with the comment period ending on August 8, 2022. (Allessio)

   Response: In response to a request, made by several organizations, the NJDEP extended the public comment period through August 8, 2022 (originally scheduled to end on July 11, 2022) and consequently changed the date of the public hearing to August 4, 2022 (originally scheduled for July 7, 2022), at the same venue (Sussex County Technical School, 105 N. Church Rd., Sparta, NJ 07871). After posting the revised information on its website, the NJDEP received comments requesting verification of the dates. In response to these requests, the NJDEP explained that the comment period end date and hearing date had been changed and stated that if anyone cannot make the in-person public hearing, the NJDEP strongly encourages written comments to be submitted by the close of the public comment period (August 8, 2022) as written comments have the same weight as an oral testimony at the in-person public hearing.

2. **Commenters requested more public meetings and two-way conversations about this project:**
   Comment: There should be more meetings like this and maybe if we had more science coming in or more discussions. There should be more than one night when people must come after work. There should be dozens of these meetings where we all sit and talk. (Otto)
   Comment: I think there should be more than one of these [public hearing]. I think that the course of discussion needs to be much more open, there should be feedback. I think the public should get a response from you before you get to make a decision. (Sumner)

Response: N.J.A.C. 7:27-22.11 (b) requires the NJDEP to provide a public comment period of at least 30 days during which the NJDEP will accept comments from the public. For similar projects the NJDEP's practice has been to allow public comment for one week beyond the public hearing, generally meaning public comment is available for 37 days. Due to the increased interest in this project, the NJDEP allowed for an additional 25 days for a total of 62 days.

The one public hearing that was hosted by the NJDEP for this Draft Operating Permit is consistent with the requirements of N.J.A.C. 7:27-22.11 (f).

3. **Several commenters support the compressor expansion project and encourage NJDEP to approve the permit** (Scalera, Rodendough, Grablutz, Kubicka, Civitan) **These commenters identified several benefits of the project:**
Comment: The proposed upgrade of the existing compressor station satisfies the NJDEP state of the art emission control requirements and stringent air quality standards. (Wells)
Comment: The TGP Project will supply more natural gas in the region, removing the reliance on #2 and #6 fuel oil, which are dirtier and less efficient fuels. (Stiles)
Comment: The TGP Project has been designed to increase natural gas capacity by utilizing the existing infrastructure and will help eliminate capacity constraints in the region, especially during peak demand. (Stiles)
Comment: The oil and gas industry, as a whole, are continuously improving on health, environmental and safety measures, with new regulations proposed and adopted regularly. TGP is committed to preserving the environment for future generations. (DiPalma, B. Rocco)
Comment: TGP upgraded their main line and reservation line in 2012. Therefore, the existing pipeline is all brand new and good for 80 years. The only thing that remains to be upgraded is the compressor stations. (J. Rocco)
Comment: This state-wide distribution system and associated compressor stations will carry renewable natural gas and green hydrogen in the future, so improving these systems is important. (Scalera)
Comment: With the Federal Government not issuing any new permits for gas lines, we need to maintain and update the ones that we have and keep them going. (Civitan, Potter)
Comment: Already people are being asking to turn off their air conditioner and only charge their car at night. We can't produce enough electricity now. We need to upgrade. (Civitan)
Comment: This project is proposing to add compression stations to an existing pipeline. This allows current demand to be met while reducing impacts on other natural resources. Increased capacity will also help eliminate constraints in the region, especially during times of peak demand. (Civitan)

Response: The NJDEP acknowledges these comments.

4. **Several commenters oppose the compressor expansion project and request that NJDEP deny the permit.** (Bijlani Scanlan, Glick, Martine, B. Kessler, Jackson, Rye, Frost, Ramos, F&WW, Neustadter, Panek, Wood, Owl, Gorman, K. Noel, Cooper, McFarland, Ramos, Sumner, Goff, Gioseffi, Stehle,

Calafiore, Evans, Hjelle, Salazar, Spicer, Brown, Lawrence, Reina-Rosenbaum, Ruga) **These commenters identified several reasons for their objection to the project:**

Comment: An overwhelming number of West Milford residents are against the expansion of fossil fuels because it is a cause of climate change. (Blaeuer)

Comment: Compressor stations are unhealthy, unsafe, and go against any New Jersey policy or Governor's executive order promising greenhouse gas reduction. Please do not approve this permit. (Allessio)

Comment: NJDEP should do their job and protect the environment (including the air, water, and soil) and the health and safety of the people and animals that live in New Jersey from dangerous sources, no matter where they originate. Please deny this permit. (A. Noel, O'Hagan, J. Kessler, Orsi, Jackson, F&WW, K. Kessler, Clarke, Wood, Aquino, Curtis, Marshall, Cieri, Dunbar, Sellen, Teshima, Voos, DiFalco, McFarland, Ramos)

Comment: NJDEP should recognize the need to transition off methane gas and the strong commitments NY is making towards this end and reject this project, as well as all other fossil fuel projects. The very least that we must do for the future of this planet is stop the expansion of our fossil fuel infrastructure, no matter what anyone else does. (Powell, DiFalco, F&WW, Conway, Blaeuer, Mendez, Cieri, Dunbar, Sellen)

Comment: Governor Murphy must recognize the dangers that these compressors prove to human health. People in NJ should be protected by NJDEP and Governor Murphy. (Rye)

Comment: We must consider all people, near and far, and we must concern ourselves with future generations. We should do the right thing, no matter what other people, other states, or other countries may do. We never know who might follow our example for the good of all people. (Mendez)

Comment: Those who have the power to stop this expansion, have the moral and legal responsibility to do so. (F&WW)

Comment: I hope you will listen to the warnings of the danger this project poses to the people of New Jersey and deny this operating permit. (Califf, F&WW, Otto, Burgi, Rogovin)

Comment: The new DEP is supposed to consider science over politics. Don't let the balance tip toward private corporate greed. Deny this permit and protect the public health of New Jersey residents. (Wood, Parlgreco, F&WW, Cieri, Voos, DiFalco)

Comment: Who makes up the difference in home values once that compressor station goes live? (J. Kessler, F&WW)

Comment: I would ask those of you considering this approval to put yourselves in the shoes and the homes of those who will be affected by it. You would not put this project in your backyard. (F&WW, Tintle, Ebbinkhuysen)

Comment: The framework and regulations that regulate these facilities are too weak. We urge you to exercise your statutory authority to protect us by using whatever discretion you have to consider the larger issues, such as the wider impacts of the air pollution and the effect of destructive greenhouse gas emissions that will be emitted by this project, rather than solely the regulatory criteria. (Ruga, Conway)

Comment: If New Jersey doesn't require any additional natural gas capacity, NJDEP should be denying air permits for additional natural gas capacity projects that require increases in capacity at New Jersey based facilities. (Frost)

Comment: These are short term gains versus long term detriments to ourselves, our children and grandchildren and I hope you do the right thing. (Sauerwein)
Comment: Fracked gas is produced in PA and piped through NJ. Please stop the TGP pipeline. It increases dangers in PA and NJ. (F&WW)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The reasons these commenters cite for denying the permit are beyond the scope of the NJDEP's regulatory authority regarding review of this Air Pollution Control Operating Permit application.

See response to comment B-1, regarding Air Quality Modeling Analysis and Health Risk Assessment that were performed for this project

See response to comment E-7, regarding permit requirements that will ensure compliance with all applicable State and Federal rules and regulations.

See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

5. **Some Commenters noted that several communities adopted a resolution opposing this project.**
Comment: Eight municipalities, surrounding the Wantage Compressor station and the pipeline, and the Somerset County Commissioners have all passed resolutions opposing this project. (F&WW, Borough of Alpine, Bloomfield Township Council, Borough of Hamburg, Montauge Township, Borough of Ringwood, Borough of Somerset, Township of Vernon, Wantage Township)
Comment: The town of Bloomfield passed a resolution against approval of the TGP in Sussex County. The resolution states many reasons why this project is a very bad idea, including the terrible safety record of this company which includes toxic gas leaks, fires and explosions; 65 year old pipes that would now carry three times as much gas, making a disastrous accident more likely; the fact that compressor stations regularly emit toxic fumes which contain contaminants that can cause grave illnesses like cancer, damage to the liver, kidneys and central nervous system. (Califf)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The resolutions passed by individual organizations are beyond the scope of the NJDEP's regulatory authority regarding review of this Air Pollution Control Permit application.

6. **Several Commenters were disappointed that some organizations supported this project.**
Comment: The West Milford Council, County Administrators and The Highlands Council all voted not to support a resolution opposing the new compressor station. So far, not one government agency or administration has decided to protect the health of the residents in Northern New Jersey. All ignored the

toxic air pollution caused by compressor stations during blowdowns and the 65-year-old pipelines that will be carrying the pressurized gas and will be leaking methane all the time. (Allessio)
Comment: West Milford residents asked their council, 3 years ago, to support a resolution opposing the new compressor station. Instead of supporting the resolution, the council made a back road deal without input from the residents. (Allessio)
Comment: The West Milford council is supporting a handful of short-term jobs while long term costs are externalized to the public. (Blaeuer)
Comment: The current West Milford Council contracted to support this project in exchange for a tiny increase in tax dollars. That tax increase will not cover the bill for short term and long-term damage that will be caused by this project. (Wood, F&WW)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The resolutions not passed by individual organizations are outside the scope of the NJDEP's review of this permit application.

7. **Several commenters were outraged that the gas will go to Westchester, NY but New Jersey residents will bear the burdens of this project. Other commenters stated that New York residents do not want or need this gas.**
Comment: None of this gas will be used in New Jersey. The residents of this area will have to deal with all the problems (environmental, health, etc), while the gas will go to Westchester County, New York. (Scanlan, Ruga, Rogovin, Glick, A. Noel, Gay, Teshima, Otto, Allessio, Powell, McFarland, Ramos, F&WW, J. Kessler, DiFalco)
Comment: The stated purpose of this project is so that TGP can fulfill an agreement they made to sell gas to an out of state private utility company, Con Edison, who wants the gas so they can lift the moratorium on new firm gas hookups in Westchester, NY. (DiFalco)
Comment: This pipeline project is attractive to New York because they will get the natural gas that they need from Pennsylvania while New Jersey and Pennsylvania will get the emissions. (Conway)
Comment: We do not need this gas, yet we are the ones who will suffer the direct fallout from this and similar proposed projects. (Powell, F&WW)
Comment: New York shut down the Indian Point Nuclear Reactors and left that electrical demand to be satisfied by gas powered electrical generation in the Hudson Valley. New Jersey residents should not breath any worse for NYs corruption – let them suffer the consequences for their action. (F&WW)
Comment: This unnecessary, major expansion of fossil fuel infrastructure poses enormous health, safety, environmental and climate hazards for NJ communities and provides no benefits. (Sellen, F&WW)
Comment: The people of Westchester, New York do not want this gas. They worked very closely with New Jersey to stop the expansion of the Williams Northeast Supply Enhancement Pipeline. New Jersey denied those compressors and I'm urging you to do the same here because New York does not want this gas. The people of New York fought very hard to ban fracking because we know how dangerous this gas is. (Ziesche)

Comment: New York has prevented fracking in the western portion of the state because of its harms to the environment. New York has also rejected numerous gas pipeline expansions in the past decade. In 2017, New York State adopted the New York Methane Reduction Plan, in which they observe that methane accounts for 9% of New York State GHG emissions, second only to carbon dioxide in its contribution to climate change. When NY state looked at the source of methane leaks, they concluded that midstream emissions accounted for 67.8% of emissions, with compressors (storage and transmission) comprising the largest source categories in the inventory. Clearly, New York recognizes the harm to our planet as well as their own climate. (Conway)
Comment: Westchester doesn't need this gas. (Allessio, Powell, F&WW)
Comment: The gas is going to Con Edison in Westchester, New York at a time when New York has some of the strongest clean energy commitments in the country, including the leadership in the Environmental Protection Act. New York is much further ahead than NJ on programs to wean customers off natural gas and has stated they see no need to expand gas facilities in New York City, a policy that is being pushed statewide. (DiFalco, Dolsky, F&WW)
Comment: New York City has placed a moratorium on new gas hookups and New York State is considering doing likewise. (Allessio, Powell, Dieterich, DiFalco, F&WW)
Comment: Since the moratorium was declared, there have been no negative impacts on home and business owners because of major investments and state commitments to alternative energy sources, including:

- In March 2019, a $250 million clean energy investment program was released by New York state in Westchester, designed to free up some natural gas capacity to allow development to continue by encouraging installation of heat pumps and other alternative solutions to eliminate GHG. (Allessio)
- In July of 2019, NY passed the Climate Leadership and Community Protection Act, the most aggressive clean energy and climate plan in the country, which makes bold commitments to transition NY from fossil fuels. (F&WW)
- New York City has passed a ban on new gas hookups and New York State has considered passing a statewide ban.
- Last fall Westchester County commissioners declared a climate emergency and are actively seeking steps to mitigate the crises and develop a Climate Action Plan.

(DiFalco)
Comment: Con Edison announced that most new gas hookups in Westchester County would be suspended until they could secure more supply. Neighboring New York City already passed legislation to ban new gas hookups as early as 2024. New Jersey must ask if New York is serious about reducing its GHG emissions. If it is, then this project has little benefit since it is a year or more from delivering on its promise. Con Edison and TGP are working together to increase the natural gas supply in RGGI states through any means necessary to get the infrastructure in place before the anticipated ban on new pipelines and new pipeline upgrades. This project is unnecessary and makes a joke out of New Jersey and New York's stated climate goals. (Conway)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Further, when issuing a new or modified Air Pollution Control Operating Permit, the NJDEP does not have the regulatory authority to deny an application because the natural gas will be used in New York.

See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

8. **Several commenters are concerned about what will happen if the demand for natural gas is replaced by green energy.**
Comment: What is TGP going to do when New York State requires all new buildings to use green energy. They won't have a customer for all that gas. Are they going to ask DEP to let them convert an import LNG terminal to an export LNG terminal and send it oversees? (Wood)
Comment: We risk this project becoming a stranded asset for New Jersey (DiFalco, Allessio, Otto, F&WW).

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. TGP's plans, if natural gas is replaced by green energy are outside the scope of the NJDEP's review of this operating permit application.

Any risk of this project becoming a stranded asset would be assumed by TGP and is outside the scope of the NJDEP's review of this operating permit application.

Any permit actions that TGP may decide to pursue, regarding LNG terminals, would be subject to a full review when proposed.

9. **Some commenters pleaded that NJDEP protect the people and communities of New Jersey and deny corporate greed the opportunity to expand the gas infrastructure.**
Comment: I've always believed that good government is supposed to protect the people and communities that we live and work in and, in general, protect the common good. Government is not supposed to protect the bottom line of major oil and gas companies. (Allessio)
Comment: I believe in responsible development that protects our people, our resources, and our future. Money and jobs are not everything that is important in this life. Community, health of residents, and pipeline union workers and their families are just as important. (Ebbinkhuysen)
Comment: It is disheartening, upsetting and a sad reflection of society when big business can negatively affect the health, environment, and property values of a community for their financial gain. Financial gain for some should not be allowed to overshadow the health and well-being of others. (B. Kessler, F&WW)

Comment: We should not be running gas pipelines from the South to carry fracked gas through our state, so that companies can increase their profits. (Rye)
Comment: If this project is completed, our clean air, clean water, and natural areas, here in Wantage, will be threatened so that an out of state company can increase their profits at the expense of our quality of life. (F&WW)
Comment: This project is about profit over people because New York allows 14% return on investment. (Madison)
Comment: Big business has no business coming to Wantage and pushing the residents to the side for profit and love of money. (F&WW)
Comment: Health and climate should be our priorities. (F&WW)
Comment: Most companies don't care about our health. We need to demand that those companies who do care about our health do the right thing. (Owl)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. When issuing a new or modified Air Pollution Control Operating Permit, the NJDEP does not have the regulatory authority to deny an application based on the extent that any one party will profit by the project moving forward.

10. **One commenter stated that the proposed increase in capacity can be achieved with one new Solar Taurus 70 turbine, rather than a Solar Titan 130 turbine.**
Comment: The East 300 upgrade project calls for 115 dekatherms per day in capacity, that can be achieved with one Solar Taurus 70 turbine and does not require a Solar Titan 130 turbine. TGP increased capacity in 2012 by 350,000 dekatherms per day by adding (2) Solar 70 turbines at CS325. (Frost)
Comment: CS325 will add 700,000 dekatherms of additional capacity by adding the Solar Titan 130 turbine. This will allow TGP to increase capacity over multiple projects that will claim there is no change at CS325 while adding substantially more capacity and methane emissions. (Frost)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The proposed operating permit contains operating and emission limits consistent with the application that was reviewed which have been found to be in compliance with all applicable regulations. If TGP wishes to exceed these limitations, in the future, they will have to submit a permit application with higher proposed limitations and justification for the increases, at which time the NJDEP will review those limitations and approve them only if they are found to be compliant with all applicable regulations at that time.

11. **Several commenters explained how the pipeline and compressor station has negatively affected their lives and their enjoyment of their home and community.**

Comment: In 2004, we built our dream home about 1000 – 2000 feet from the compressor station, not even knowing there was a pipeline in our backyard. My first experience with this pipeline was on August 14, 2017. I was home alone and there was a tremendous rumbling, and the earth shook with great intensity, the sound was terrible. I have never experienced anything like that. Eventually, I found out that it was caused by a serious malfunction at the compressor station. (Jackson, F&WW)
Comment: We built our forever home in Wantage 3 years ago, with the intention of raising our children there. I grew up in Wantage and came back because of the clean air and rural community. It has destroyed our sense of peace and well-being. I have sleepless nights, wondering if I am doing the right thing staying in my forever home or am I allowing my kids to be subjected to some horrible future, such as cancer? (K. Kessler)
Comment: I live in Vernon. If I had known a dangerous industrial site would be built within miles of our home, I never would have decided to raise my family here. (Sellen)
Comment: We backed out of buying a house that we loved in Wantage because it was within a mile of the compressor and pipeline, especially after hearing stories of people needing to evacuate their homes because of major blowdown that went unnoticed by the company for nearly an hour because the facility is unmanned. Local authorities had to go to the facility and try to find a way to contact the company. (Evans)
Comment: I live across the street from the existing Wantage compressor station and can hear the humming from the current compressor. (F&WW)
Comment: During construction of the Williams Transco compressor station in Roseland, NJ, in 2013, the company conducted a blowdown of the facility and released large amounts of gas and other chemicals into the local community, forcing an emergency evacuation of the nearby Roseland Elementary School. (Ruga, DiFalco, Jackson, Aquino, F&WW)
Comment: We regularly experience the terrible toxic smell of gasses from the compressor station and are unable to stay outside at these times. The air quality gives you a headache. A family member became nauseous and sick to their stomach when outside during a compressor station blowdown. (Jackson, F&WW)
Comment: A resident of Westtown, NY, speaking of her experiences with the Minisink compressor station in that town, said it felt like she was constantly breathing paint fumes [the VOCs in the gas]. She also experienced many of the bad health effects caused by VOCs, including migraines, dizziness, passing out, and a general feeling of illness. Eventually, she moved away to save her health. (Wood)
Comment: An official told my neighbor that when we smell the gasses, we should leave the area. But she has horses, how is she supposed to pack up her horses and go. (Jackson)
Comment: This project would create serious risks and negative impacts on public health, public safety and on our climate and environment. (Calafiore, Evans, Hjelle, Salazar, Spicer, Brown, Lawrence, Reina-Rosenbaum, Jackson, E. Israel, F&WW, McFarland, Ramos) Wantage residents and those in the surrounding region as well as along the pipeline already suffer from these negative impacts. NJDEP has a duty to protect these New Jersey residents. (Calafiore, Evans, Hjelle, Salazar, Spicer, Brown, Lawrence, Reina-Rosenbaum, Jackson, E. Israel, F&WW)
Comment: This fossil fuel infrastructure project may have serious consequences for the health and well-being of the residents, their quality of life and their property values. (Ruga, F&WW)

Comment: These compressor stations would bring more noise, light, and air and water pollution to the area. (McFarland, Ramos)
Comment: There are millions of people who will be harmed; directly by leaks or indirectly by pollution, exposure to fossil fuel contents / byproducts or because the money could have been better spent elsewhere if this project is completed. (F&WW)

Response: The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

The operating permit contains emission limits and operating requirements, along with monitoring and recordkeeping requirements to ensure compliance. In addition, the NJDEP will conduct a compliance inspection at the facility on a routine basis. If the facility violates these requirements, it is subject to monetary penalties or other enforcement action pursuant to N.J.A.C. 7:27A-3.

Regulations governing noise in New Jersey can be found at N.J.A.C. 7:27-29 "Noise Control" (link: NJDEP-N.J.A.C. 7:29, Noise Control). The NJDEP does not enforce Noise Control Regulations but provides funding to County Environmental Health Departments so that county inspectors could respond to noise complaints.

The State of New Jersey does not regulate light pollution, which is generally handled locally and is also regulated by stand-alone municipal ordinances.

The NJDEP maintains a toll-free hotline number, 1-877-WARNDEP, citizens can use to report environmental incidents, abuses, and complaints which occur in or impact New Jersey. NJDEP encourages citizens to report any complaints that they have using this hotline so that they can be investigated.

12. **One commenter is very concerned about the well-being of birds and how this project will affect them. The commenter states that these affects forecast what human beings will eventually experience.**
Comment: Long ago, a canary in a cage used to be brought into coal mines to warn miners that odorless carbon monoxide has increased to harmful levels. When the canary died, it was time to get out of the mine because birds are more sensitive to air pollution than humans. Three years ago, a study showed that 3 billion birds have been lost since 1970, in North America – that's one in every 4 birds gone. This is our modern day "canary in a coal mine" warning. We need to heed the warning. (Orsi)
Comment: Air pollution is part of the reason for the loss of these birds. Air pollution has been shown to disrupt all aspects of birds' lives, just like it does ours. Air pollution can damage respiratory systems,

causing them to struggle to migrate or be less fit when they arrive at their breeding destinations. Ozone can damage vegetation and decrease the number of insects, impacting food and nesting resources for birds, causing decreased reproduction and death. (Orsi)
Comment: A study by Penn State researchers found that sound pollution from compressor stations can harm birds as well. Songbirds nesting near the sound of natural gas compressors had fewer eggs hatched. (Orsi)
Comment: 15 new studies together found that 58 migratory songbird species have had negative impacts from mercury which included damage to navigation, flight, and endurance, all of which harm a bird's reproductive success. (Orsi)
Comment: A study published in the Proceedings of the National Academy of Science associates an increase in ozone with decreased overall bird abundance across the US, while states that had regulatory programs in place to limit emissions, had an increase in bird abundance. (Orsi)
Comment: A study by the Cornell Lab of Ornithology revealed that government regulations that reduced NOx levels, included in the Clean Air Act, helped preserve bird populations by saving the lives of 1.5 billion birds. (Orsi)

Response: The NJDEP evaluates air operating permit applications as they are submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Air Quality Modeling Analysis and Health Risk Assessment were conducted for this project by the facility and reviewed and approved by the NJDEP. This project has demonstrated compliance with all New Jersey air quality standards and NAAQS. Its health risks were predicted to be negligible (see response to comment B-1).

New Jersey has regulations to restrict the emissions of NOx "Control and Prohibition of Air Pollution from Oxides of Nitrogen" (N.J.A.C. 7:27-19) and Mercury "Control and Prohibition of Mercury Emissions" (N.J.A.C. 7:27-27).

13. **Comment:** Some argue that natural gas is better than oil; I agree. However, if you are using that fact to justify expanding natural gas infrastructure, the existing oil, diesel, kerosene, etc infrastructure should be turned off, in exchange for the new natural gas infrastructure. (F&WW)

    Response: See response to comment A-2, regarding NJDEPs Protecting Against Climate Threats (PACT) regulation which will eliminate storage and combustion of No.4 and No. 6 fuel oil in New Jersey and restrict electric generating units from combusting fuel oil, except as a back-up fuel, in New Jersey.

14. **One commenter stated that Fracked gas companies have known about climate change since 1981 but covered it up and misrepresented the role that Fracked gas plays in climate change.**
    Comment: The CEOs of Fracked gas companies have deceived our politicians. Exxon knew of climate change in 1981 but hid it for 27 years, spending 30 million dollars on thinktanks and researchers that promoted climate denial, according to Greenpeace. (Wood)

Comment: They pushed fracked gas as the global warming "bridge" fuel. Calling methane "clean". (Wood)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. What gas companies knew about climate change and when they knew it is beyond the scope of the NJDEP's review of this operating permit application.

15. **Some commenters stated that the people who support this project probably do not live near it.**
Comment: It is unlikely the majority of those proposing and supporting these changes live near the proposed construction sites. Otherwise, why would they support this project, knowing its potential negative impacts to their own health, the health of their loved ones, quality of life and home values? (Ebbinkhuysen, Tintle)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. Where those who support this project live is beyond the scope of the NJDEP's regulatory authority regarding review of this Air Pollution Control Operating Permit application.

16. **Comment:** This project will cost NJ ratepayers in several ways:
    - Increase global warming / climate change, adding to the cost of adaptation.
    - Increase ratepayers cost upon completion of project; after the Southern Reliability Link was completed, they raised the rates 25%.
    - Increased fuel costs in the future, as compared to renewable energy where the fuel comes free from the sun or wind.
    - May cost more to shut it down in the future, as the majority of fossil fuel facilities will be shut down eventually.
    - Using capital for this project, limits the amount of capital available for renewable energy projects which will result in additional costs for ratepayers. (Madison, F&WW)

Response: The NJDEP evaluates air operating permit applications as submitted and approves or denies applications based on their compliance with applicable State or Federal air pollution control rules and regulations. The costs to New Jersey rate payers are beyond the scope of the NJDEP's regulatory authority regarding review of this Air Pollution Control Operating Permit application.

17. **Some commenters are disappointed with Governor Murphy and the NJDEP and question their commitment to fighting climate change.**
Comment: Governor Murphy was supposed to be our environmental champion, but he is proving to be an environmental catastrophe. (Ruga)
Comment: A commentor asks what Mr. Murphy's position is on the Wantage compressor station expansion, stating that he has written him this question many times without any response. (F&WW)

Comment: Your disrespect for the area's residents tells me that you don't care about them. (F&WW)
Comment: Since Governor Murphy is doing nothing to stop this project, we must assume that he does not care about the health and safety of his constituents or the impacts of climate change on NJ and is only interested in helping his industry cronies so they will continue to support his political ambitions. (Dolsky)
Comment: You can claim to be for the people of NJ and for the environment but if you refuse to take a stand on this, we will have no choice but to assume you are as crooked and corporate as every other bureaucrat. (F&WW)

Response: See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

18. **Comment:** Last week the New York Times published a story that stated that state treasurers are using government muscle and public funds to punish companies that are trying to reduce GHGs. Clearly, New Jersey is better than this. We are expecting more from the state of New Jersey and from Governor Murphy. (E. Israel, F&WW)

    Response: New Jersey is not one of the states discussed in the story identified by the commenter.

    See responses to comments A-1, A-2, and A-3, regarding NJDEP's efforts to minimize greenhouse gas emissions and promote renewable energy in the state of New Jersey.

19. **Comment:** We had to go through the DEP office just to put our house 250 feet from a stream. That same stream is running right next to where the existing compressor station is and that doesn't even matter. (K. Kessler)

    Response: This operating permit is only one of many approvals that must be obtained in order for the East 300 Project to proceed. The Air Pollution Control Operating Permit approval process also requires the draft Operating Permit to be subject to a public comment period. Proximity of a facility to a body of water is beyond the scope of the NJDEP's authority regarding review of this Air Pollution Control Operating Permit application.

H) NJDEP Initiated Changes

1. Table 4 in section A of the draft operating permit lists the individual pollutants that are included in the "other air contaminant" emissions from Significant Source Operations at the facility along with an annual emission rate for each individual pollutant. However, the individual pollutant details from Insignificant Sources Operations at the facility were omitted from this section of the draft operating permit. The NJDEP has added Table 5 in section A of the proposed operating permit which lists the individual pollutants that are included in the "other air contaminant" emissions from Insignificant Source Operations at the facility, which consists of 415 tons per year of methane. This is consistent with the information presented elsewhere in the permit and in the Statement of Basis.

2. The Total CO2e emissions listed in Table 1 in Section A of the of the draft Operating Permit inadvertently included only potential CO2e emissions from the significant source operations at the facility (162,796 tpy). As noted in footnote 2 of that table, that value should have included all CO2e emissions for the facility, including insignificant source emissions (10,400 tpy) and fugitive emissions (649 tpy). Therefore, NJDEP has updated this value, in the proposed permit, to reflect the total potential CO2e emissions from the entire facility, including significant sources, insignificant sources and fugitive emissions (173,845 tpy). This change does not affect the potential emissions allowed by the permit as the individual permit limits have not changed.