

VIA EMAIL

Ms. Gina McCarthy, U.S. EPA Administrator  
United States Environmental Protection Agency  
Office of Administrator – Mail Code 1101A  
1200 Pennsylvania Avenue NW  
Washington, D.C., 20460

September 2, 2015

Re: Petition to U.S. EPA to object to Algonquin Incremental Market Air Title V Permits issued by New York State Department of Environmental Conservation

Application ID: 3-3730-00060/00013 – Air Title V – Southeast Compressor Station  
Application ID: 3-3928-00001/00027 – Air Title V – Stony Point Compressor Station

Dear Region Administrator McCarthy,

We, the undersigned, are writing to strongly urge you to deny the Spectra Algonquin Incremental Market (AIM) project's Title V air permits for the Southeast and Stony Point Compressor Stations issued by the New York State Department of Environmental Conservation. We ask that you consider the substantive research and peer-reviewed scientific studies demonstrating that compressor stations can significantly pollute air quality and pose a serious public health risk to New Yorkers. Both of these compressor stations are located in a highly populated region with substantial vulnerable populations. Numerous elected officials, including the Westchester, Rockland and Putnam County legislatures, have raised serious public health concerns based on scientific evidence regarding the prodigious amounts of toxic emissions from these compressor stations.

In addition to the public health and safety risks of these two compressor stations, we are also writing to you with great alarm because of the serious risks to more than 20 million people living within the 50-mile radius of the Indian Point nuclear facility. The AIM project's new 42 inch diameter high pressure gas pipeline was approved by various agencies and will be built within a few hundred feet from vital structures that are necessary for the failsafe shutdown of the nuclear reactors. A pipeline rupture or terrorist attack at the site could result in catastrophic air contamination of the Hudson Valley, New York City and the surrounding region for generations to come. Nuclear, pipeline and medical disaster experts, joined by elected officials and the public, have been calling for a comprehensive, independent and transparent risk assessment; however, it has not been conducted.

Recently, a transformer fire at Indian Point resulted in several thousand gallons of oil spilled into the Hudson River. Many elected officials, including New York State Governor Cuomo, are calling for the facility to be shut down permanently. Even if Indian Point is shut down and decommissioned, the highly radioactive, long-lived spent nuclear fuel rods will remain on site, making this a dangerous location for the AIM pipeline. We ask that you take this critical information into consideration when making your decision on these permits. The threat posed by a potential catastrophic nuclear disaster only 35 miles from the most densely populated city in the country should be reason enough to deny these permits.

Mounting evidence from the growing number of peer-reviewed scientific studies concerning gas infrastructure including compressor stations and the links to significant adverse health impacts forewarns of an emerging public health crisis. We maintain that New York State and the U.S. EPA have the absolute and unequivocal right to protect the health and safety of its citizens. Resolutions concerning the AIM project calling for health and safety protections issued by Westchester, Rockland and Putnam County Legislatures<sup>1</sup> are fully supported by federal, state, and local elected officials, health and environmental experts, and the public. In fact, the

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<sup>1</sup> Putnam County Resolution: <https://sape2016.files.wordpress.com/2014/05/putnam-county-resolutions-104-163-and-182-1.pdf>  
Westchester County Resolution: <https://sape2016.files.wordpress.com/2014/05/080414-wcbol-resolution-no-80-2014-requesting-due-diligence-on-environment-p.pdf>  
Rockland County Resolution: <https://sape2016.files.wordpress.com/2014/05/rockland-aim-resolution.pdf>

Medical Society of the State of New York House of Delegates (MSSNY HOD) adopted a policy on April 4, 2015, to support governmental assessment of the health and environmental risks that are associated with natural gas pipelines. This was followed by additional new policy adopted by the American Medical Association House of Delegates (AMA HOD) on June 15, 2015, which specifically supported legislation that would require a comprehensive Health Impact Assessment (HIA) regarding the health risks associated with natural gas pipelines.<sup>2</sup>

Yet, the New York State Department of Environmental Conservation (DEC), in its response to public comments on the AIM's project air permits, roundly dismisses the body of independent peer-reviewed science linking significant adverse health impacts to gas infrastructure and radioactivity associated with these operations that were also cited in the New York State Department of Health (DOH) Commissioner's Health Review. These compressor station emission studies were based on actual air samples collected in communities not on industry projections. Understanding that "HVHF activities," as the term was used in the Health Review, refers to the entire complex lifecycle of shale gas development, production and distribution that includes drilling, extraction, drilling waste management, and distribution of the oil or gas via pipelines, compressor stations, metering and regulating stations, and other infrastructure components, Commissioner Zucker stated in his opening remarks regarding the state's decision to prohibit HVHF, "The public health impacts from HVHF activities could be significantly broader than just those geographic locations where the activity actually occurs, thus expanding the potential risk to a large population of New Yorkers."<sup>3</sup>

Commissioner Zucker also described uncertainties associated with unconventional drilling because of new issues, such as high levels of radioactivity in Marcellus shale formations. He cited several studies that are currently underway and recommended that the state should exercise the precautionary principle pending the results of such important studies<sup>4</sup> some of which are included herein. However, the DEC's dismissive response, excerpted from the Federal Energy Regulatory Commission's (FERC) Final Environmental Impact Statement (FEIS), to public comments in connection with high levels of radioactive contaminants in the Marcellus Shale and gas infrastructure, specifically radon, its decay products, polonium and lead, their half-lives and associated health impacts, has no basis in scientific literature and incorrectly asserts, "...The half-lives of radioactive decay products in the pipeline are relatively short (under one hour)..."

The issues outlined in this letter supported by the groundbreaking research of our leading independent medical and scientific experts and the regulatory framework provide the grounds for rejection of air permits for the Stony Point and Southeast Compressor Stations based on at minimum the following:

- *Newly discovered material information.*
- *The proposal will endanger the health, safety or welfare of the people of the State of New York.*
- *No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.*

Compressor stations emit massive quantities of carbon dioxide and other greenhouse gases and other criteria pollutants, such as nitrogen oxides and volatile organic compounds (VOCs) linked to cardiovascular and lung disease, cancer and other significant health impacts. VOCs interact with nitrogen oxides and other hydrocarbons in the presence of sunlight to form ground-level ozone. Ozone pollution can travel long distances and can trigger a variety of severe respiratory problems, worsen asthma, reduce lung function and can permanently scar lung tissue.<sup>5</sup>

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<sup>2</sup> <http://concernedhealthny.org/wp-content/uploads/2015/05/HOD-Revisions-of-Resolution-159.pdf>

<sup>3</sup> [http://www.health.ny.gov/press/reports/docs/high\\_volume\\_hydraulic\\_fracturing.pdf](http://www.health.ny.gov/press/reports/docs/high_volume_hydraulic_fracturing.pdf)

<sup>4</sup> [http://www.health.ny.gov/press/reports/docs/high\\_volume\\_hydraulic\\_fracturing.pdf](http://www.health.ny.gov/press/reports/docs/high_volume_hydraulic_fracturing.pdf)

<sup>5</sup> <http://www.epa.gov/groundlevelozone/health.html>

The AIM pipeline expansion project seeks to significantly expand the Southeast Compressor Station from 40,020 HP to 50,340 HP, and the Stony Point Compressor Station from 38,000 HP to 59,000 HP. Each is projected to emit hundreds of thousands of tons of air pollutants per year in a region that is considered a non-attainment zone for air quality standards.

American Lung Association data indicates that more than 75% of the populations in Westchester, Rockland and Putnam Counties are composed of at-risk subpopulations and include children, senior citizens, residents below the poverty line, residents with cardiovascular disease, COPD, adult and pediatric asthma, and diabetes.<sup>6</sup> Health risks associated with further degradation in a region with poor air quality and significantly high levels of at-risk populations must be fully evaluated before any decisions are made about air permits. Adverse health outcomes have the greatest impact on children, our most vulnerable population.<sup>7</sup> Their immature organs and developing bodies make it more difficult for them to detoxify or eliminate certain toxins. Pound for pound, they receive proportionally greater doses of contaminants found in air, water and food than adults.

Particulate matter and volatile organic compounds, such as benzene and formaldehyde, are other pollutants with serious health impacts. A peer-reviewed study by Carpenter et al., found levels of benzene and formaldehyde, which are carcinogens, near gas compressor stations that frequently exceeded health standards.<sup>8</sup> Formaldehyde is a byproduct of incomplete gas combustion at compressor stations, but is also released with fugitive methane. Formaldehyde can impact almost every bodily tissue, leading to acute impacts, such as asthma, and chronic health effects involving neurological, genetic, pulmonary, and reproductive toxicity and cellular damage. Chronic exposures to benzene increase risk of leukemia, birth defects, and significant respiratory effects. The study's findings indicate that health-based risk levels do not fully provide potential adverse health impacts from air pollutants, and fail to fully consider vulnerable populations, including children, pregnant women and the elderly, and also demonstrate the critical importance of community-based studies to inform state testing methodology.<sup>9</sup>

Particulate matter, also heavily emitted from compressor stations can cause early death from acute and chronic exposures, and is also linked to cardiovascular and respiratory disease. Fine particle pollution may also cause reproductive and developmental damage and cancer.<sup>10</sup> A new study by the Harvard School of Public Health<sup>11</sup> found that women exposed to high levels of fine particulate matter, particularly during the third trimester of pregnancy, faced twice the risk of having a child with autism as mothers not exposed to fine particulate matter.

Clearly, the growing body of evidence demonstrating adverse health impacts from shale gas infrastructure raises serious doubts concerning the accuracy of projected air quality impacts and raises serious questions regarding the appropriateness of the application of the National Ambient Air Quality Standards (NAAQS) to provide adequate safeguards to public health near the Southeast and Stony Point compressor stations. The NAAQS address regional air quality concerns, but were not developed to evaluate the air quality and health safety in a smaller geographic area with fluctuating emissions.<sup>12</sup> Moreover, there is virtually no monitoring or oversight. Yearly averages fail to account for exposure to significant spikes in concentrations of air pollutants during accidental or planned blowdown events, and even the yearly averages are entirely self-reported. There is no third-party verification that emissions are within safe limits. Implementation of baseline and continuous monitoring protocols for existing operations and thorough analysis of cumulative health impacts are imperative.

A peer-reviewed study by Brown, Weinberger, et al.<sup>13</sup> details the failures in monitoring and measuring protocols for air pollutants. Current methodology used for evaluating compliance with ambient air standards

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<sup>6</sup> <http://www.stateoftheair.org/2014/states/new-york/westchester-36119.html>

<sup>7</sup> <http://www.imp.lodz.pl/upload/oficyna/artykuly/pdf/full/Lan21-01-04.pdf>

<sup>8</sup> <http://cc585cc14e85a9b5a9e1292d.eightfolddesign.netdna-cdn.com/wp-content/uploads/2014/10/Warning-Signs.pdf>

<sup>9</sup> <http://www.ehjournal.net/content/13/1/82>

<sup>10</sup> <http://www.ehjournal.net/content/13/1/82>

<sup>11</sup> <http://www.hsph.harvard.edu/news/press-releases/fine-particulate-air-pollution-linked-with-increased-autism-risk/>

<sup>12</sup> <http://www.environmentalhealthproject.org/wp-content/uploads/2012/03/Compressor-station-emissions-and-health-impacts-02.24.2015.pdf>

<sup>13</sup> <http://www.environmentalhealthproject.org/wp-content/uploads/2014/04/reveh-2014-0002-Brown-et-al.pdf>

does not sufficiently determine intensity, frequency, or duration of actual human exposure to the mixtures of toxic substances released regularly at gas infrastructure sites, including compressor stations. Air measurements can significantly underestimate actual exposures without continuous monitoring measurements. Reference standards do not accurately determine health risk because they do not fully consider the potential synergistic effect of different toxic substances and increased transport of toxins deep into the lung via particulate matter. Other serious deficiencies include lack of consideration of local weather conditions including air inversions, toxic emissions from planned and unplanned compressor station blowdowns, start-up and shut-down operations, malfunctions, and cumulative impacts of other heavily polluting gas infrastructure, such as metering and regulating stations, pipelines, and pigging stations, and other polluting infrastructure in the same region.

The Rand study on air pollution in Pennsylvania determined that 60%–75% of the estimated negative impacts, largely due to adverse health impacts, result from compressor station emissions, and that when compressor stations operate below capacity, their emissions are at the lower end of their projected range. However, when they operate at higher capacity, actual emissions exceed estimates declared in permit applications.<sup>14</sup>

It is well documented that the source of the natural gas supply, the Marcellus Shale, is known for its high levels of radioactive materials including radium and its decay product, radon, the leading cause of lung cancer in non-smokers.<sup>15</sup> As gaseous radon is transported with a decay time of 3.8 days, its decay products, lead and polonium, accumulate along the interior of the pipelines. Radioactive material at compressor stations, and metering and regulating stations, valves, pipelines and pigging stations pose an increased risk of exposure to workers and residents. Radon's decay products, lead, a probable carcinogen, and polonium, a radioactive carcinogen, have half-lives of 22.3 years and 138 days, respectively, and are solids known to attach to dust particles. Lead is a neurotoxin and polonium can cause DNA damage when radon is inhaled and absorbed by the lungs.<sup>16</sup>

Spectra Energy's own Resource Report filed with FERC in February 2014 included test results of natural gas samples with high levels of radon concentrations noted between 20 pCi/L and 41 pCi/L at various sampling locations close to NYC distribution points.<sup>17</sup>

Furthermore, the Pennsylvania Department of Environmental Protection (PA DEP) TENORM study<sup>18</sup> documents radon at various sites including compressor stations. Spectra's Uniontown compressor averaged 44 pCi/L and Spectra's Bechtelsville compressor averaged 32 pCi/L. The PA DEP report indicates Lead-210 and Polonium-210 emit radioactive particles that may be a potential inhalation or ingestion hazard when pipes and machinery are opened for maintenance and cleaning and stated that during filter change-out a Lead-210 activity level of 3,580 pCi/g was identified and is representative of interior conditions confirming the build-up of the longer-lived radon decay progeny in equipment and pipes.

Regulators and operators may be grossly underestimating radium levels and other radioactive contaminants by using improper methodology to detect radiation as demonstrated in a peer-reviewed study by Schultz et al.<sup>19</sup> Their subsequent study calls attention to the use of radium alone to predict radioactivity concentrations can greatly underestimate total radioactivity levels and that uranium and thorium decay series require scrutiny as well.<sup>20</sup>

Polychlorinated biphenyls (PCBs), known carcinogens, black powder and anaerobic microbials also accumulate in pipeline infrastructure, particularly in the existing Algonquin pipeline. Pigging stations, where pipes are inspected and cleaned, and condensate tanks at compressor stations and metering and regulating stations, as well as venting operations throughout the pipeline, provide multiple pathways of exposure.

<sup>14</sup> <http://iopscience.iop.org/1748-9326/8/1/014017>

<sup>15</sup> E. Rowan, M. Engle, 2011, Radium content of oil and gas field produced waters in the northern Appalachian Basin, U.S. Geological Survey Report 2011-1135

<sup>16</sup> Textbook of Children's Environmental Health, Edited by P. Landrigan and R. Etzel, Oxford University Press, 2013

<sup>17</sup> Spectra Energy Resource Report 9 submitted to FERC February 2014 with Bowser and Mornier lab report (January 2014)

<sup>18</sup> [http://www.portal.state.pa.us/portal/server.pt/community/oil\\_gas\\_related\\_topics/20349/radiation\\_protection/986697](http://www.portal.state.pa.us/portal/server.pt/community/oil_gas_related_topics/20349/radiation_protection/986697)

<sup>19</sup> <http://pubs.acs.org/doi/abs/10.1021/ez5000379>

<sup>20</sup> <http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2015/4/ehp.1408855.acco.pdf>

Radioactive material and other toxins can be inhaled and can contaminate surrounding property and nearby soil, and surface and groundwater supplies. These materials can also be inhaled when they become airborne through dust particles.<sup>21</sup> Corrosion may also cause these particles to leach into soil and waterways.

Reports of health impacts, specifically from compressor stations, condensate tanks, metering and regulating stations along with other infrastructure, are mounting around the country in shale plays, with disturbing commonality.<sup>22 23</sup> They include reports of rashes, breathing difficulties, headaches, nausea, and nosebleeds. It is alarming that similar reports have already been seen right here in New York, around gas infrastructure of much smaller scale than what is now proposed by the AIM pipeline expansion project, such as the Minisink Compressor Station in Orange County, New York (12,600 HP).<sup>24</sup> New York State and EPA officials must investigate these reports of health complaints and determine the long-term consequences to residential communities before allowing any further gas infrastructure expansion.

In comments submitted to the Federal Energy Regulatory Commission in November 2014 by Richard Kuprewicz, of Accufacts, a pipeline engineer and safety expert, states, “The AIM Project is clearly oversized and is only a partial step toward a more system-wide pipe upgrade path within the state of New York. The AIM Project thus appears to be either an unjustified pipeline expansion or a segmentation of a larger, system-wide upgrade. The AIM Project effort is substituting quicker-to-install compressor horsepower placed at Stony Point against additional needed pipe replacement. Such a quicker path may be an attempt to avoid a proper environmental review and introduces a substantial loss of pipeline system efficiency via wasted horsepower and subsequent increased air pollution emissions.”<sup>25</sup>

Furthermore, Mr. Kuprewicz and Paul Blanch, a nuclear power engineer and safety expert, maintain that Entergy’s internal analysis of the siting of AIM’s 42” wide high pressure pipeline infrastructure 105 feet from vital infrastructure at the Indian Point nuclear power facility and a confirmatory analysis by the Nuclear Regulatory Commission, severely underestimate the risk of catastrophic failure at the plant in the event of a pipeline rupture in this sensitive location and that system dynamics will substantially delay the recognition and appropriate shutoff and responses such that the gas will explode and burn for quite a period of time.<sup>26</sup>

Moreover, Dr. Irwin Redlener, Director of the National Center for Disaster Preparedness at Earth Institute and professor of Health Policy and Management at Columbia University<sup>27</sup> expressed concern about the proposed plan to expand the Algonquin pipeline without a thorough, objective review of the environmental impact and potential public health risks that might be posed by this project stating, “Of particular concern is the proximity of the project to a significant seismic zone and the Indian Point nuclear plant. The combination of factors presents a real risk of major disaster with profound, long-term impact on the region. I truly hope that the time and resources will be made available to assess the safety of the project and reassure the public that every possible risk has been properly examined.”

Spectra Energy’s pre-filing for the Atlantic Bridge Project and its plans for the Access Northeast project, its third in a series of massive expansions to the same Algonquin pipeline infrastructure and compressor stations in the same region for transporting gas to New England and the Canadian Maritime provinces coupled with the Department of Energy’s approval of gas export via the Pieridae Liquid Natural Gas Export Terminal in Nova Scotia, Canada, raise the specter of a New York sacrifice zone largely for the purpose of gas export.

**A hard look at the current relevant scientific literature and a full Health Impact Assessment is imperative in order to inform your decision that demands the utmost scrutiny.**

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<sup>21</sup> <https://shalegasespana.files.wordpress.com/2012/10/whitereport.pdf>

<sup>22</sup> <http://cc585cc14e85a9b5a9e1292d.eightfolddesign.netdna-cdn.com/wp-content/uploads/2014/10/Warning-Signs.pdf>

<sup>23</sup> <http://www.earthworksaction.org/files/publications/Health-Report-Full-FINAL.pdf>

<sup>24</sup> <http://www.environmentalhealthproject.org/wp-content/uploads/2015/06/Summary-of-Minisink-Results.Public.pdf>

<sup>25</sup> <https://sape2016.files.wordpress.com/2013/10/20141121-507829933631-2.pdf>

<sup>26</sup> <https://sape2016.files.wordpress.com/2013/11/prb-transcript-1-28-2015-2-2.pdf>

<sup>27</sup> <http://www.mailman.columbia.edu/our-faculty/profile?uni=ir2110>

**We therefore strongly urge U.S.EPA, pursuant to its mission and mandate to first and foremost safeguard public health and safety, to reject the air permits for the Southeast and Stony Point Compressor Stations for the AIM pipeline expansion project.**

Sincerely,

Baum Forum  
Hilary Baum, Founder

Catskill Citizens for Safe Energy  
Jill Wiener, Member

Catskill Mountainkeeper  
Wes Gillingham, Program Director

Chefs for the Marcellus  
Hilary Baum, Director

Citizens' Environmental Coalition  
Barbara Warren, Executive Director

Citizens for Water  
Joe Levine, Director

Climate Mama  
Harriet Shugarman, Executive Director

Coalition Against the Rockaway Pipeline (CARP)  
Maureen Healey, Co-Coordinator

Coastal Research and Education Society of Long Island, Inc  
Arthur Kopelman, President

Community Watersheds Clean Water Coalition  
Suzannah Glidden, Treasurer

Concerned Families of Westchester  
Linda Snider, Member

Concerned Health Professionals of New York  
Larysa Dyrszka, MD, Co-Founder

Concerned Residents of Carmel and Mahopac  
Jerry Ravnitzky, President

Cortlandt Watch  
Susan McDonnell, President

Croton Climate Initiative  
Lisa Moir, Founder

Damascus Citizens For Sustainability  
Barbara Arindell, Director

Dominican Sisters  
Eileen Gannon, Leadership Team

Dominican Sisters in Committed Collaboration  
Sr. Didi Madden, Promoter of Justice

Dominican Sisters of Blauvelt  
Sr. Cecelia Lavan, OP

Dominican Sisters of Hope  
Mary Feigen, OP, Justice Representative

Earthworks  
Nadia Steinzor, Eastern Program Director

Elmirans and Friends Against Fracking (EFAF)  
Colleen Boland, Co-Organizer

Federated Conservationists of Westchester County  
Alicia Malloy, Program Director

Food and Water Watch  
Alex Beauchamp, Northeast Regional Director

Frack Action  
Julia Walsh, Campaign Director

Franciscan Sisters of the Atonement  
Sr. Margaret Sikora, Director, Justice, Peace and Integrity of Creation

Grassroots Environmental Education  
Patricia Wood, Executive Director

Great Neck Breast Cancer Coalition  
Laura Weinberg, President

Hudson River Sloop Clearwater  
Manna Jo Greene, Environmental Director

Huntington Breast Cancer Coalition  
Karen Miller, President

Indian Point Safe Energy Coalition  
Marilyn Elie, Leadership Counsel

Keep Yorktown Safe  
Rosanne Brackett, Co-Chair

New York City Friends of Clearwater  
Edie Kantrowitz, President

New York Climate Action Group  
Judith Canepa, Co-Founder

New Yorkers Against Fracking

Jessica Mullen, Hudson Valley Regional Coordinator

New York Sustainable Business Council  
Laura Ornstein, Coordinator

Nuclear Information and Resource Service  
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NYH2O  
Buck Moorhead, Director

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Pepacton Institute, LLC  
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Arnold Piacentini, BS, MS, PhD Chemical Engineering

Protect Orange County  
Pramilla Malick, Founder

Religious Organizations Along the River (ROAR)  
Sr. Doretta Cornell, Communication Coordinator

Rockland Coalition Against Fracking  
Michelle Solomon, Organizer

Sane Energy Project  
Patrick Robbins, Communications Coordinator

SEnRG  
Nancy Vann, President

Shut Down Indian Point Now  
Catherine Skopic, Chair

Sierra Club – Atlantic Chapter  
Roger Downs, Conservation Director

Sierra Club – Lower Hudson Group  
Bill Meyer, Chair

Stop the Algonquin Pipeline Expansion  
Susan Van Dolsen, Co-Founder

Stop the Minisink Compressor Station (StopMCS)  
Pramilla Malick, Founder

Stop the Pipeline (STP)  
Mark Pezzati, Steering Committee



Sustainable Otsego  
Adrian Kuzminski, Moderator

The Center for Sustainable Rural Communities  
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The Mothers Project  
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Carl Grim, Green Sanctuary Member

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Universalist Unitarian Congregation of the Hudson Valley  
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We Are Seneca Lake  
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