



TOWN OF NORTH SALEM

Delancey Hall
266 Titicus Road
North Salem, N.Y. 10560

Office of the Supervisor

Date July 26, 2021

Ona Papageorgiou, P.E.
Chief, Mobile Source & Climate Change Planning
Bureau of Air Quality Planning, Division of Air Resources
New York State Department of Environmental Conservation
625 Broadway, Albany, NY 12233-3251

Subject: Air Regulations: 6 NYCRR Part 203

Dear Ms. Papageorgiou,

I first want to thank you for the work that you and the DEC have been doing to protect our air quality. The NYS DEC absolutely needs to adopt and strictly enforce all of the recommendations outlined in the comments from Clean Air Council regarding 6 NYCRR Part 203 Oil and Gas Sector Air Emissions.

North Salem is a community in northern Westchester with a densely populated community 2 miles from the Southeast compressor station, a Title V facility that is considered among the top 10 polluting compressor stations in New York according to studies and reports by the Environmental Health Project - NY. Our High School is 1.5 miles from the valve substation that often has blowdowns.

Over the years I have been vocal in discussing the issues raised by my constituents about the smell of Mercaptan in our Peach Lake community (approximately 20% of the homes in my Town) and at the North Salem High School where they have repeatedly had to cancel school, not have children play sports on their fields and move children out of one building to their nearby grammar school during an emergency because of the threat of gas leaks. All of these were created by scheduled and unscheduled blowdowns of the Algonquin pipeline at facilities close to these areas of Town.

It is unfathomable to me, with Methane being such a significant greenhouse gas, that we still allow companies to vent the gas to the atmosphere so they can run 'pigs' through the pipe for cleaning or simply because of their need to do plumbing work at the pump stations. In a 2016 letter from Algonquin Gas Transmission Inc, they stated *"As natural gas is released into the air, there will be a loud, rushing noise that may last several hours. The noise may be accompanied by an odor resulting from the odorant mercaptan, which is injected into the natural gas to make it recognizable for safety reasons"*. As this letter portrays these are not simple vents, these go on for hours at very high pressures, minimally 600 psi, from large 26 and 42 inch lines, enough energy to heat many many homes in a year. These releases are harmful to our residents especially our more vulnerable; pregnant women, children, seniors, and individuals with respiratory and cardiovascular problems. We need these regulations strengthened and I applaud you and Commissioner Seggos for your efforts.

It is also imperative that the DEC require publicly accessible, continuous real-time air monitoring at all leak-prone facilities including compressor stations. Planned blowdowns must be re-directed to lower-pressure pipelines or tanks instead of simply being released to the air. Until that is implemented, advance blowdown notifications must be required. Having been involved in this discussion for some time I have

written letters to Spectra Energy and Federal Energy Regulatory Commission. In those letters I have asked to be to be informed of the blowdowns because of the affect it has had on my community. The last reply I received from Spectra Energy in 2014 was simply that the US DOT and the NYS DEC do not require that they notify a municipality unless they have facilities there. This paragraph is from that letter.

Second, you requested that Algonquin be notified of both planned and unplanned blowdowns that occur at our compressor station at Southeast. As you may know, Algonquin's operations are regulated by U.S. Department of Transportation and the NYS DEC. Since Algonquin has no facilities in the Town of North Salem, notification is neither required nor necessary.

Figure 1 - From 2014 letter

The current operations are not good for anyone's health, they are a cause of wasteful energy usage and they negatively affects climate change. Thank you for your efforts for my community. If there is anything that I can do to support you further please let me know.

Sincerely,



Warren J. Lucas
Supervisor, Town of North Salem
266 Titicus Road
North Salem, NY 10560

cc Senator Peter Harckham
 Assemblyman Chris Burdick
 N.S. Town Board