**Northeast Supply Enhancement Project (PF16-5)**

Williams/Transco Pipeline is proposing to build a 32,000 horsepower gas-powered compression station on land very close to Trap Rock Quarry in Franklin Township (Somerset County) NJ to, as they say, provide increased capacity to move natural gas to Brooklyn, Queens, Staten Island and Long Island. They explored two sites: One is near Princeton Walk, and the other is near the Superfund Site on Higgins Farm, the Buddhist Vihara and Princeton Manor. On 12/14/16, Williams chose the 52 acre site near Higgins Farm. They stand to benefit financially; NY anticipates getting more gas; and NJ will likely shoulder the dangers.

Residents who oppose this should go to the FERC (Federal Energy Regulatory Commission) website to log-in concerns (comments). *Note: By going to the FERC website, putting your cursor over Documents & Filings, and choosing e-Library from the drop-down menu, you can select to see other comments for Docket No. PF16-5.*

***Councils of Franklin Township, South Brunswick& Montgomery have passed resolutions in opposition to this.*** However, FERC regulates whether or not this company is allowed to build the compressor station, and permits are required from State agencies like DEP before any construction can begin.

**Send comments to FERC and copy NJDEP – Ruth Foster at** [Ruth.Foster@dep.nj.gov](mailto:Ruth.Foster@dep.nj.gov)

New Jersey Department of Environmental Protection

Office of Permit Coordination & Environmental Review

401 East State Street – PO Box 420

Trenton, NJ 08625

Attn.: Ruth W. Foster, PhD., P.G., Acting Director

**How to submit eComments:**

1. **Go to** [**www.FERC.gov**](http://www.FERC.gov) **or go to** [**https://ferconline.ferc.gov/QuickComment.aspx**](https://ferconline.ferc.gov/QuickComment.aspx)

* Put cursor over Documents & Filings section on the blue ribbon at the top of the page.
* From the drop-down menu, select “e-Comment”.
* Click on the orange “e-Comment” button.
* Fill-in the required information (name, email address, phone # (optional), and then type the characters in the picture into the box provided.
* Click “Authorize”.

1. **Check your email – Look for “FERC eComment Request” email.**

* In this email, click on the first link to display the “Submit eComment” screen.

1. **Enter the Docket Number**

* Enter PF16-5, the Northeast Supply Enhancement docket number.
* Click “Search”.
* After a moment, the Northeast Supply Enhancement application will appear in the search results. Click the blue “🞦” button to add it to your “Selected Dockets”.

1. **Enter Your Comments**

* Enter comments by typing directly onto the screen or Copy & Paste your comments from a Word or text document.
* Note: The form is limited to 6,000 characters (including spaces) and does not allow attachments. Your session will time-out after 35 minutes, so if you want to enter something long, the Cut & Past method is recommended.

1. **Send Comments**

* Click the “Submit” button.

**If you want to mail your submission to FERC:**

Kimberly D. Bose, Secretary

Federal Energy Regulatory Commission

888 First Street, NE

Washington, D.C. 20426

**Concerns about building Compressor Station 206 in Franklin Twp. by Trap Rock Quarry**

* Williams/Transco has a long history of safety violations that have led to fires/explosions and leaks with loss of lives, illnesses, injuries and damaged land/buildings. They are proposing this compressor station 206 as part of a bigger project to move an additional 400 million cubic feet of natural gas from fracked gas in the Marcellus Shale region of Pennsylvania, combined with gas from the Gulf of Mexico Region, to Rockaway, NY to provide service to National Grid that supplies gas to Brooklyn, Queens, Staten Island & Long Island.
* On 12/14/16, after presenting their Resource Reports on 11/22/16 without data about the proposed Compressor Station since the site had not been chosen, Williams/Transco chose Site 3, but they noted that they needed to keep Site 2 as a possibility for now. Site 2 is within 400’ of Princeton Walk, and Site 3 is near the Higgins Farm Superfund site where contaminated groundwater continues to be monitored. Nearby is Princeton Manor & the Buddhist Vihara. Site 3 has a high water table, is on Carters Brook, and run-off of pollutants is a concern. Heathcote Brook is near Site 2. Both of these brooks empty into the Raritan River, a source of clean water for many. Many homes in the area have wells or, due to the contaminants from Higgins Farm, cannot have wells.
* This compressor station would include two 16,000 HP turbine gas-powered units. Compressor stations, reportedly, are needed every 40 to 100 miles along pipelines, and there are two other compressor stations within this range that Williams/Transco claim are not appropriate for “uprating” to add compression. These are Station 207 in Old Bridge and Station 205 in Princeton Junction.
* Gas-powered compressors emit many toxins as part of routine operations, and these include known carcinogens as well as respiratory irritants. Additionally, National Ambient Air Quality Standards (NAAQS) do not consider the synergistic potential of mixed chemicals from emissions, and NAAQS, which are regional limits over time for compliance, are not for a specific site with elderly, children or other vulnerable populations nearby. Averaging emissions overtime (i.e., 24-hour period averages vs. hourly or peak rates) underestimates the actual acute exposure effects in real time.
* Williams proposes to clear 15 acres of forest & build on a 6-acre site for a 6-building station that would be manned M-F from 7AM to 3:30 PM in an area where the Quarry regularly uses dynamite blasting. Gas-powered turbine engines would move more methane (natural gas), and the gas-powered turbines release more toxic gases than electric ones (which William said they could not build on these sites in their 11/22/16 Resource Reports). A fire/explosion at their site could spread to nearby homes or through the woods. Water availability and pressure in the area is too weak to support firefighting, and volunteers fight fires here.
* Trap Rock Quarry actively blasts a few times each week. There are no reported studies, or a plan from Williams/Transco, about the impact of tremors on the stability of the compressors, and concerns are that these blastings could destabilize it and cause fire/explosion with resulting added emissions of toxins.
* Williams would need to prove that their compressor station meets noise requirements, but theirs, added to the noise from operations at Trap Rock, would drastically impact those in the neighborhood.
* The pipeline includes pipes that are over 50 years old, and corrosion or cracks in them can lead to gas escapes (explosions/fires). Adding increased gas along lines may add stress, and this combination (added compression + older pipelines) has led to dangerous explosions/fires throughout our country. A Williams’ spokesperson noted, in a newspaper article, that the older pipeline in Trap Rock was changed and moved in 1987; however, no record of that is readily apparent, and it was not clear from his assertion if all of Mainlines A & C were changed. That was the first indication from this company that any of the pipelines on or near Trap Rock Quarry were replaced after initial installation in the 1960’s. Reportedly, this was to accommodate expansion of Trap Rock’s mining activity. Trap Rock plans to continue mining until 2041, and it is not known how or if they plan to expand the footprint of their mining.
* Sufficient time and warning to mitigate an explosion or allow for other preventable measures could be hindered because odorant is not added to the natural gas transmission until it is ready to be shipped to end-users. Additionally, supervisory control & data acquisition (SCADA) control systems for natural gas pipelines are not sufficiently sensitive to detect natural gas leaks early before a catastrophe. The frequency of using internal inspection devices traveling within the pipeline is too infrequent.
* Water lines along Routes 518 or 27 cannot supply needed pressure/water to the sites in case volunteer firefighters need to address a fire, explosion or other accident. Fire Marshalls in the area have said that they would need to call for a water truck in the event of a forest fire, and water from this only lasts 8 minutes.

**Request FERC to Require that Williams/Transco complete the following prior to the publishing by FERC of a Draft Environmental Impact Statement (DEIS)**

**(a) in a transparent manner that is data-driven and meaningful, and**

**(b) with reports readily available for public review, so that the health and safety concerns might be addressed in the DEIS.**

1. **Independent Risk and Preparedness Assessment as well as Payment for Infrastructure Upgrades Needed to Ensure Safety**

Williams should not be permitted to impose additional financial burdens on the Townships as a result of this Project if it is approved, including but not limited to: infrastructure damage to roads, bridges, culverts, water mains, utilities, cost increases necessary for emergency response enhancements, and loss of tax revenues associated with decreases in property values and/or usage.

Williams-Transco should provide thorough, comprehensive, data-based information about their construction, mitigation and operational plans for the lifetime of the Project, and these plans must clearly include evidence of consultation with local councils, agencies and commissions who know more about the sites and local issues than State agencies.

The plan should also account for (1) the impact from any anticipated future expansion of Trap Rock’s operations; (2) any potential expansion of the compressor station site; (3) the current water access in the area of the proposed compressor station; (4) the ability of first responders to effectively address accidents and potential catastrophic events that might be due to issues with the compressor station and associated apparatus, including pipelines, and natural events like hurricanes, significant rainfall, etc., and (5) results of the Blast Vibration Analysis with an analysis that includes the effect of repeated blasts at the Quarry over the expected life of the proposed compressor station and associated apparatus, including pipelines, on the compressor unit, pipelines, nearby buildings and the environment.

FERC should also mandate that Williams provide (a) detailed reports about the number of welds on all pipeline that are part of this Project that pre-date 1972, and (b) details about the specific pipeline replacements and integrity checks on all pipeline associated with this Project.

Furthermore, Williams should be required to provide a qualitative and quantitative cost analysis that demonstrates the socio-economic impact on things like roads and water usage, and this study should detail the capabilities and preparedness of local first responders’ level of understanding about the potential incidents at a compressor station, available staff and when they are available, equipment, materials, and anything that the first responders think they may need to address an accident or catastrophic event at the compressor station or in the associated pipeline for evacuations, emergency medical care, containment, remediation, natural gas and forest fire suppression techniques, and air monitoring.

1. **Independent Health Impact Assessment and Comprehensive Noise Assessment**

FERC should require a Comprehensive Health Impact Assessment to study the potential impact of compressor station emissions and noise on residents living within one mile of the proposed compressor station site who volunteer to participate that is (a) completed by an independent agency not hired directly by Williams or FERC, (b) paid for by Williams, (c) completed before construction, during construction and after construction for at least three years.

FERC should also require that Williams (1) provide short-term emissions exposures modeling and not just an average for 24 hours or “tons per year”; (2) implement real time continuous air quality monitoring, completed by an independent agency, for the following chemicals: CH3, NOx, CO, VOC, PM10, PM2.5, SO2, HAPs, CO2, and Formaldehyde for a period of no less than 32 days in a row to capture data during two to three weather cycles; (3) a complete comprehensive exhaust output detail for proposed STA206 at peak power that includes total exhaust output; exhaust temperature at turbine exit; comprehensive peak and average noise output across the acoustical spectrum analysis including low frequency (1 to 100 Hz), audible frequency (100 to 14,000 Hz), and high frequency (14,000 to 32,000 Hz); and chemical exhaust output including NOx, CO, VOC, PM10, PM2.5, SO2, HAPs, CO2, and Formaldehyde and water; and (4) the specific technology that will be proposed to be used to minimize/eliminate low frequency noise from the compressor.