

Archived: Wednesday, February 3, 2021 3:32:07 PM

From: Ned Savage

Sent: Saturday, January 30, 2021 8:17:50 PM

To: anita.walthall@deq.virginia.gov

Subject: anita.walthall@deq.virginia.gov

Importance: Normal

Ms. Walthall,

My name is Edward Savage of Catawba, VA. I'm writing to ask that the proposed Lambert Compressor station, a 27,756-horsepower fossil fuel facility that would emit carbon monoxide, nitrogen oxides and formaldehyde, be elevated to the Air Pollution Control Board, for the following reasons:

Lack of information regarding Hazardous Air Pollutants (HAPs)

- The only hazardous air pollutant that is subject to hourly and yearly emission limits in the draft permit is formaldehyde.
- There were several other hazardous air pollutants listed during the Environmental Impact Statement process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit.
- Factoring in the emission levels of hazardous air pollutants generated by the two Transco compressor stations, the cumulative impact from those and the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby community over the limit in terms of risk of adverse health effects.

Health concerns

- Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema.
- MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.
- The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%. The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization.
- Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia. In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

Environmental Justice concerns

- The permit's EJ Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated.
- There are serious discrepancies between the information MVP's consultant provided in the EJ Analysis Report, and what MVP ultimately communicated in its final permit application.
- Four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius.
- There are serious and significant discrepancies between the information provided in the EJ Analysis Report conducted for MVP, and what MVP ultimately communicated in their final version of the permit application.

Noise pollution concerns

- MVP has applied to have weekly startups and shutdowns for both the station's turbines, which would result in 208 events per year. Each event would create spikes in air pollution emissions, as well as significant noise impacts.
- It is unclear how MVP plans to coordinate with the two existing Transco compressor stations in order to stagger these events so as to reduce the amount of air and noise pollution and harm on nearby communities.

Cumulative Impact Concerns

- DEQ should take cumulative impacts and existing levels of air pollution into consideration when evaluating the suitability of the proposed location for the Lambert Compressor Station.
- If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants.

	Title V	Combined Emissions(tons/year)	Transco 165/166(tons/year)	Lambert (Air Permit)
NOx	yes	628.91	616.85	12.06
CO	yes	408.5	391.48	17.02
VOC	yes	112.358	109.48	2.878
PM		45.98	35.97	10.01
PM 10		45.98	35.97	10.01
PM 2.5		46.418	35.97	10.448
SOx		19.1	13.9	5.2

Procedural concerns

- Owing to the current Covid health crisis, DEQ's notification processes are increasingly reliant on electronic outreach. This is inappropriate as many of the impacted localities do not have consistent internet access. Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.
- During the public information session on Jan 7, 2021 regarding the timeline for approval, members of the public flagged that the timeline seems set by the applicant. As the project is missing a major state level permit (a Clean Water Act 401 water certification from North Carolina), DEQ staff acknowledged that they possibly should NOT be moving forward.
- The completion rates for construction of the mainline MVP project that the developer included in the draft permit are significantly overstated, and could unfairly influence decision makers reviewing the permit. MVP does not use "full to restoration" percentage complete, instead relying on any preconstruction or ground-disturbing activity to inflate numbers.
- Among other legal challenges, the MVP mainline is currently unable to cross many miles of water bodies and MVP has announced to Va. DEQ that they will file for an individual permit which would add substantial delay.

Thank you,
Edward Savage
8094 Upper Craig's Creek Rd
Catawba, VA 24070
540-520-4154

Archived: Wednesday, February 3, 2021 3:32:07 PM
From: [Liane Salgado](#)
Sent: Saturday, January 30, 2021 6:36:33 PM
To: anita.walthall@deq.virginia.gov
Subject: MVP Lambert Compressor Station Draft Air Permit
Importance: Normal

Dear Ms. Walthall,

I request that more pollutants be listed in the permit besides just formaldehyde, as other toxic molecules are also going to be emitted, such as benzene, toluene, and xylene. Factoring in the emission levels of all the known hazardous pollutants generated by the two compressor stations, the cumulative impact from those and from the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby residents over the limit in terms of risk of adverse health effects.

There are serious known dangers to the amounts of pollutants that will be emitted, as well as the increases in noise pollution. DEQ should take the cumulative impacts, as well as the existing levels of air pollution into account when deciding on this location. If this facility were built beside the two existing Transco stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds, and other potentially hazardous air pollutants.

Please do everything in your power to prevent this facility from being built. There are many safety and procedural concerns.

Thank you,

Liane Salgado

--

Liane Salgado
Chapel Hill, NC

Permaculture Design Services
<https://goldeneggpermaculture.com/>

"The greatest change we need to make is from consumption to production, even if on a small scale." Bill Mollison

Archived: Wednesday, February 3, 2021 3:32:07 PM
From: Liane Salgado
Sent: Wednesday, February 3, 2021 11:47:22 AM
To: Walthall, Anita
Subject: Re: MVP Lambert Compressor Station Draft Air Permit
Importance: Normal

2514 Damascus Church Rd, Chapel Hill, NC 27516

919 923-5289

Thank you for letting me complete the comment.

On Wed, Feb 3, 2021 at 11:39 AM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:

Ms. Salgado,

Thank you for submitting your comment.

All commenters need to include their name, **mailing address**, and **telephone number**. Please provide a mailing address and telephone for the public comment record.

Regards,
Anita Walthall

Anita L. Walthall
Air Permit Writer
Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Dr.
Salem, VA 24153
(540) 562-6769

www.deq.virginia.gov

Effective APRIL 1, 2019 DEQ - Blue Ridge Regional Office has RELOCATED to:

901 Russell Drive, Salem, VA 24153

- Please update your records -

On Sat, Jan 30, 2021 at 6:36 PM Liane Salgado <gamberster@gmail.com> wrote:

Dear Ms. Walthall,

I request that more pollutants be listed in the permit besides just formaldehyde, as other toxic molecules are also going to be emitted, such as benzene, toluene, and xylene. Factoring in the emission levels of all the known hazardous pollutants generated by the two compressor stations, the cumulative impact from those and from the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby residents over the limit in terms of risk of adverse health effects.

There are serious known dangers to the amounts of pollutants that will be emitted, as well as the increases in noise pollution. DEQ should take the cumulative impacts, as well as the existing levels of air pollution into account when deciding on this location. If this facility were built beside the two existing Transco stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds, and other potentially hazardous air pollutants.

Please do everything in your power to prevent this facility from being built. There are many safety and procedural concerns.

Thank you,

Liane Salgado

--

Liane Salgado
Chapel Hill, NC

Permaculture Design Services
<https://goldeneggpermaculture.com/>

"The greatest change we need to make is from consumption to production, even if on a small scale." Bill Mollison

--

Liane Salgado
Chapel Hill, NC

Permaculture Design Services
<https://goldeneggpermaculture.com/>

"The greatest change we need to make is from consumption to production, even if on a small scale." Bill Mollison

Archived: Monday, February 1, 2021 4:16:56 PM

From: [Kris Peckman](#)

Sent: Sunday, January 31, 2021 1:05:03 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Dear Ms. Walthall and DEQ:

For many reasons the air permit for the Lambert Compressor station should not be approved. At minimum, it should go before the Air Pollution Control Board in a public hearing.

To begin with, this question needs to be deferred until the Southgate project is approved, if it ever is. It lacks a Clean Water Act 401 certification from North Carolina. Even the mainline MVP project is currently in limbo.

The health effects of the compressor station are much more significant than stated, as they do not include compounds such as toluene and xylenes. Further, the compounding effect of this new compressor station with the two nearby Transco compressor stations would require a Clean Air Act Title V major source air pollution permit.

MVP's consultant identified environmental justice concerns which MVP failed to communicate in their final permit application.

As a citizen concerned not only for my own backyard, but for the backyards of my fellow Virginians, I implore you to take my comments seriously.

--

Kristin Peckman
8131 Webster Dr.
Roanoke, VA 24019
(540)366-7780

Archived: Thursday, March 11, 2021 10:13:22 AM
From: gregan757@everyactioncustom.com
Sent: Wednesday, March 10, 2021 12:57:12 AM
To: anita.walthall@deq.virginia.gov
Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air
Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,
Ms Glenda Kohlhafer-Regan
4000 City Walk Way Apt 441 Charlottesville, VA 22902-5569
gregan757@gmail.com

Archived: Thursday, March 11, 2021 10:13:23 AM
From: everettlewis1@everyactioncustom.com
Sent: Wednesday, March 10, 2021 1:37:56 AM
To: anita.walthall@deq.virginia.gov
Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air
Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,
Mr. Everett Lewis
7811 Colonial Springs Blvd Alexandria, VA 22306-2849
everettlewis1@cox.net

Archived: Thursday, March 11, 2021 10:13:23 AM
From: Fluffygran1@everyactioncustom.com
Sent: Wednesday, March 10, 2021 7:31:39 AM
To: anita.walthall@deq.virginia.gov
Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air
Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,
Mrs. Shirley Akers
515 Depot St NE Christiansburg, VA 24073-2013
Fluffygran1@verizon.net

Archived: Thursday, March 11, 2021 10:13:23 AM

From: Allison Zec

Sent: Wednesday, March 10, 2021 10:12:17 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

To whom it may concern,

I am a Virginia resident writing in reference to the Lambert Compressor Station permit that is being considered for Pittsylvania county. I am writing to express my desire for the permitting process to be elevated to the Air Pollution Control Board for a full public hearing. We have evidence that the compressor station will be emitting unacceptable levels of environmental toxins and particulate matter. The environmental impact statement for the station already admitted to emitting dangerous levels of benzene which is linked with leukemia. This is also in addition to the outputs of the two Transco compressor stations nearby.

In order to address these concerns the air board needs to call for a full station redesign with elimination of local pollutants in mind, and make that part of the permitting process. The permit, as it stands currently, allows for severe environmental and health degradation. Please take this request into consideration as it is vitally important to protect Virginia's environment and the health of its people.

Thank you for your time,

~Allison J. Zec

Archived: Thursday, March 11, 2021 10:13:23 AM
From: vpannabe@everyactioncustom.com
Sent: Wednesday, March 10, 2021 8:06:02 PM
To: anita.walthall@deq.virginia.gov
Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air
Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,
Ms. Virginia Pannabecker
705 S Main St Apt A3 Blacksburg, VA 24060-5269
vpannabe@vt.edu

Archived: Thursday, March 11, 2021 10:13:23 AM

From: sarahcreel5@everyactioncustom.com

Sent: Wednesday, March 10, 2021 5:44:29 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. Sarah Creel

10320 Ford Rd Fairfax, VA 22030-3223

sarahcreel5@gmail.com

Archived: Thursday, March 11, 2021 10:13:24 AM

From: thaworth@danriver.org

Sent: Wednesday, March 10, 2021 4:12:49 PM

To: anita.walthall@deq.virginia.gov

Cc: 'Sonya Wolen'

Subject: Dan River Basin Association Public Comment/RE: Lambert Compression Station, Pittsylvania County, VA

Importance: Normal

Ms. Anita Walthall
Virginia Department of Environmental Quality (DEQ)
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153

**RE: Proposed Stationary Source Permit to Mountain Valley Pipeline, LLC to Construct and Operate Lambert Compressor Station
(Registration No. 21652)**

We, the board of directors of the Dan River Basin Association (DRBA), believe that DEQ and MVP have neglected to adequately address environmental justice concerns, performed an incomplete site suitability analysis, and failed to demonstrate compliance with applicable air permitting requirements for the Lambert Compressor Station. As a consequence of these fundamental flaws in the permitting process, DEQ has neglected to ensure that issuing the permit would adequately maintain air quality and protect local residents – in particular, communities of color and low-income communities – from disproportionate adverse health impacts.

We request that the permit be submitted for consideration by the State Air Pollution Control Board (“Board”); request a public hearing so that the board hears directly from affected community members along with other members of the public; and urge the Board to deny the permit.

Dan River Basin Board of Directors
Dated: 3/10/21

Submitted by: Tiffany Haworth
thaworth@danriver.org
Cell: (276) 340-0422

All DRBA offices are currently closed to the public.

Dan River Basin Association (DRBA)

NC Office: 413 Church Street, Suite 401, Eden, NC 27288/(336) 627-6270

VA Offices: 3300 Kings Mountain Rd., PO Box 7, Collinsville, VA 24078/ **276.634.2545**

308 Craghead St., Suite 104, Danville, VA 24541

[More about DRBA](#)



This email has been checked for viruses by AVG antivirus software.

www.avg.com

Archived: Thursday, March 11, 2021 10:13:24 AM

From: DeMasi, Susan M

Sent: Wednesday, March 10, 2021 2:21:05 PM

To: anita.walthall@deq.virginia.gov

Subject: Comment of MVP Southgate Lambert Compressor Station Air Permit Application

Importance: Normal

Attachments:

[RIFA - Walthall VDEQ 3-10-21.pdf](#)

Ms. Walthall – attached please find a letter of support of the MVP Southgate Project from the Chairman of the Danville Pittsylvania Regional Industrial Facility Authority. Regards, Sue DeMasi

Susan M. DeMasi

City Clerk

City of Danville

427 Patton Street, Room 428

Danville, VA 24541

Tel: 434-797-8928

Fax: 434-799-5041

Email: sdemasi@danvilleva.gov

Danville-Pittsylvania Regional Industrial Facility Authority



427 Patton Street, Room 428
Danville, Virginia 24541
(434) 797-8928
email: sdemasi@danvilleva.gov



Sherman M. Saunders, Chairman

Ronald S. Searce, Vice Chairman

March 10, 2021

Anita Walthall
Blue Ridge Regional Office
Virginia Department of Environmental Quality
901 Russell Drive
Salem, VA 24153

Dear Ms. Walthall,

The Board of the Danville Pittsylvania Regional Industrial Authority voted to confirm their support of the Mountain Valley Pipeline Southgate Project and offer the following on behalf of the Danville-Pittsylvania Regional Industrial Facilities Authority (DPRIFA) requesting that DEQ and the Air Pollution Control Board (Air Board) approve the air permit for the Lambert Compressor Station. The RIFA Board believes the MVP Southgate project will bring material benefits to our region including enhancement of our ability to attract good paying jobs. It is our understanding that Mountain Valley has designed its proposed Lambert Compressor Station with numerous controls that ensure it has no adverse impact on air quality. RIFA believes the Air Board should approve the project.

It is critically important for our region that we have reliable access to affordable natural gas. Economic development and public safety require reliable and predictable energy sources so that businesses can run smoothly, and residents can heat their homes affordably. It is important to our business and citizens to have reliable, competitively priced and diverse sources of energy.

The Board requests approval of MVP Southgate's application so that our community can realize the economic development and quality of life benefits of this important project.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Sherman M. Saunders", written over a horizontal line.

Sherman Saunders
Chairman

Archived: Wednesday, February 3, 2021 4:11:48 PM

From: Cynthia Munley

Sent: Tuesday, February 2, 2021 3:17:47 PM

To: anita.walthall@deq.virginia.gov

Subject: Needed: A Full hearing before the Virginia Air Pollution Control Board and no permitting for an MVP Lambert Compressor Station Air Permit

Importance: Normal

Name: Cynthia Munley
425 Roanoke Boulevard
Salem, VA 24153
540 389 8915

1. A full hearing in front of the Virginia Air Pollution Control Board is needed because of the severe consequences of adding another compressor station in this location and because no further environmental destruction should occur for the MVP, which is likely to fail.
2. This matters to me because everything is wrong concerning any permitting for the MVP's proposed compressor station in Pittsylvania County. The project makes no sense on every level. It is even a loss for the companies funding it and it is likely to be uncompleted and unsuccessful. I wish that no additional environmental damage be incurred for this failure of a project. Permitting a compressor station when MVP is likely to be a failed project and pipeline-to-nowhere would further expose the irresponsibility of the state of Virginia for wrongly permitting MVP at every juncture. MVP is being challenged with seven legal suits and recently failed to get a needed variance from FERC. With a new FERC Chairman who sees MVP as an overbuilt, unnecessary pipeline, MVP will likely suffer further delay and eventually cancelled by investors who cannot make a profit from it—only losses. MVP does not have a viable way to cross water bodies. Using individual permits, it is likely to be challenged at every turn because the 42-inch mammoth pipeline has no way to cross water bodies without violating the Clean Water Act. Stop permitting an environmental, justice and financial disaster that is MVP.

Comments:

Cumulative impacts make unsuitable the proposed location for the Lambert Compressor Station. If built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and hazardous air pollutants.

Health concerns:

- Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema.
- MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.
- The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%.
- The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization.
- Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia.
- In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

Noise:

- The noise pollution resulting from 208 weekly startups and shutdowns for both the station's turbines would create unacceptable levels of air pollution emissions and significant noise impacts.

Environmental Justice concerns:

Genuine and accurate information discrepancies exist between the information provided by MVP and the EJ Analysis Report and what was communicated in MVP's final permit application. If this is the end of the review process, it is altogether likely that the EJ issues will be challenged in court. Although four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site, MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius. MVP's information was cherry-picked and will be challenged. Best to stop this permit here.

Procedural concerns:

Although DEQ's notification processes rely on electronic outreach, the impacted localities do not have consistent internet access. The outreach timeline should have been earlier and conformed to Virginia's 2020 Environmental Justice Act.

During the public information session on Jan 7, 2021 regarding the timeline for approval, it was noted that a Clean Water Act 401 water certification from North Carolina is missing and DEQ staff acknowledged that they possibly should *NOT* be moving forward.

The completion rates for construction of the mainline MVP project that the developer included in the draft permit are significantly overstated and could unfairly influence decision makers reviewing the permit. The most difficult and contested portions of the MVP have yet to be constructed making MVP's claim of 92% completion is nothing more than a wish claim for MVP. MVP does not use "full to restoration" percentage complete, instead relying on any preconstruction or ground-disturbing activity to inflate numbers. With the Mainline nowhere near completed, there is no need to permit or create infrastructure for a project with such uncertainty.

Wait for new census data with the most up to date information. It is not necessary to permit the MVP Lambert Compressor Station at this time.

Archived: Wednesday, February 3, 2021 4:11:49 PM

From: [Shelley Tamres](#)

Sent: Tuesday, February 2, 2021 3:15:56 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Ms. Walthall,

I am writing to ask that the DEQ turn down this air permit. At minimum, I demand a full hearing before the Virginia Air Pollution Control Board. We have absolutely no business at this point in time of continuing to build out fossil fuel infrastructure. Especially since the fossil fuel industry doesn't foot the bill to pay for recovery from all the destruction of floods, droughts, storms, and wildfires caused by the climate crisis...taxpayers do. We can no longer afford to do "business as usual."

Additionally, DEQ needs to take cumulative impacts and existing levels of air pollution into consideration when evaluating the suitability of the proposed location for the Lambert Compressor Station. There are already two existing compressor stations there, and the nearby population has a higher elderly population than the state average, meaning more people who are vulnerable to pollutants.

Four Environmental Justice communities were identified within a 3-5 mile radius of the proposed compressor station site.

With the Mainline nowhere near completed, there is no need to permit or create infrastructure for a project with such uncertainty.

Sincerely,

Shelley Tamres

108 Willow Pl, Sterling VA 20164

A concerned citizen and taxpayer in Virginia

Archived: Wednesday, February 3, 2021 4:11:49 PM

From: Alexander Pellegrino

Sent: Tuesday, February 2, 2021 2:25:47 PM

To: anita.walthall@deq.virginia.gov

Subject: Public Comment in Support of Full Hearing--Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Dear Anita,

I hope you are well today. I am submitting a written comment to ask for a full hearing in front of the Virginia Air Pollution Control Board regarding the MVP Lambert Compressor Station.

Name: Alexander Pellegrino

Address: 28 W Rock St, Apt 108 Harrisonburg, VA 22802

Phone: 540 908-8118

As a longtime Virginian and environmental specialist, I have seen the negative impacts compressor stations have on our human communities and natural ecosystems. One key issue that I've seen is the isolated regulatory framework. Studying and regulating air pollutants from natural gas extraction based on their *individual* linkages to human health impacts or environmental ecosystems does not reflect reality.

We need to take cumulative impacts into account if we are serious about protecting our health and the health of our ecosystems. If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants.

The article included below provides an example of the very real health risk. This national review study based on county level data concluded the following (emphasis my own):

"We conducted a county-level ecological study, using VOC emission data from the 2017 National Emissions Inventory, 2017 age-adjusted total mortality per 100,000 population from CDC data, and covariates from the County Health Rankings data. Results of multiple linear regression models showed that total age-adjusted mortality, controlling for covariates (race/ethnicity, education, poverty, urbanicity, smoking and obesity rates), was significantly higher in association with greater non-methane VOC emissions from compressor stations. **Twelve individual VOCs were also associated with significantly higher adjusted mortality. Results provide preliminary evidence that compressor stations along natural gas pipelines are sources of pollutant exposures that may contribute to adverse human health outcomes.**"

Hendryx, M., & Luo, J. (2020). Natural gas pipeline compressor stations: VOC emissions and mortality rates. *The Extractive Industries and Society*.

<https://doi.org/10.1016/j.exis.2020.04.011>

Thank you for your time. Please bring this issue in front of the VA Air Pollution Control Board for a full hearing.

Best,

Alexander Pellegrino

Archived: Wednesday, February 3, 2021 4:11:49 PM
From: Shelley Tamres
Sent: Wednesday, February 3, 2021 1:40:26 PM
To: Walthall, Anita
Subject: Re: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

703-450-0218. Sorry about that!

On Wed, Feb 3, 2021 at 11:42 AM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:
Ms. Tamares,

Thank you for submitting your comment.

All commenters need to include their name, mailing address, and **telephone number**. Please provide a telephone number for the public comment record.

Regards,
Anita Walthall

Anita L. Walthall
Air Permit Writer
Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Dr.
Salem, VA 24153
(540) 562-6769

www.deq.virginia.gov

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On Tue, Feb 2, 2021 at 3:15 PM Shelley Tamres <shelleytamres@gmail.com> wrote:
Ms. Walthall,

I am writing to ask that the DEQ turn down this air permit. At minimum, I demand a full hearing before the Virginia Air Pollution Control Board. We have absolutely no business at this point in time of continuing to build out fossil fuel infrastructure. Especially since the fossil fuel industry doesn't foot the bill to pay for recovery from all the destruction of floods, droughts, storms, and wildfires caused by the climate crisis...taxpayers do. We can no longer afford to do "business as usual."

Additionally, DEQ needs to take cumulative impacts and existing levels of air pollution into consideration when evaluating the suitability of the proposed location for the Lambert Compressor Station. There are already two existing compressor stations there, and the nearby population has a higher elderly population than the state average, meaning more people who are vulnerable to pollutants.

Four Environmental Justice communities were identified within a 3-5 mile radius of the proposed compressor station site.

With the Mainline nowhere near completed, there is no need to permit or create infrastructure for a project with such uncertainty.

Sincerely,

Shelley Tamres

108 Willow Pl, Sterling VA 20164

A concerned citizen and taxpayer in Virginia

Archived: Thursday, February 4, 2021 7:51:47 AM
From: Crystal Cav
Sent: Wednesday, February 3, 2021 12:05:27 PM
To: Walthall, Anita
Subject: Re: Comments for the DEQ VA Chatham County Compressor Station
Importance: Normal

yes

Crystal A Cavalier 5123 N NC HWY 119 Mebane NC 27302, 336-530-0930 phone

On Wed, Feb 3, 2021 at 11:37 AM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:
Ms. Cavalier-Keck,

Thank you for submitting your comment.

All commenters need to include their name, **mailing address**, and telephone number. Please provide a mailing address for the comment record.

Anita

Anita L. Walthall
Air Permit Writer
Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Dr.
Salem, VA 24153
(540) 562-6769

www.deq.virginia.gov

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On Wed, Feb 3, 2021 at 10:46 AM Crystal Cav <criscavalier@gmail.com> wrote:
Thank you, Ms. Walthall,

My name is Crystal Cavalier. I am a citizen of the Occaneechi Band of Saponi Nation. I am an indigenous water protector, a political scientist, and a mother. Our territories transcended county and state lines however this time, we are in VA discussing issues in the VA area. The Lambert Compressor station is in the traditional homelands of the Saura, Saponi, Monacan, and Occaneechi. This location is in Chatham, Virginia, USA, Pittsylvania County VA. Many county residents through the years have amassed impressive collections of stone points, tomahawk heads, and pottery fragments. Somewhat rarer is mortar-and-pestle type grinding stones and a wide variety of bone instruments. Also in the area, known to many are the numerous v-shaped rock dams still visible in the Banister and Pigg Rivers. This area of VA and the route the pipeline is taking is indigenous territory and our people still reside there. We know that many indigenous communities intermarried with Free People of Color, and due to the eugenics rules and laws of Virginia's Dr. Plecker, many indigenous people have been erased, silenced, and forced into a racial category that does not fit them all for the sake of land claims. This is another example of an environmental attack on the Southeastern Woodland Tribes. We know that many times corporations, businesses do not take the time to do a study on the people, environment, and area, and if they do, they toss those items aside like rocks

oftentimes overlooking valuable pieces of my ancestors.

Multi-Million dollar corporations such as MVP Southgate and governments are still trying to terminate people who have been living peacefully trying to co-exist in a government that does not value people who aren't of European American descent and falsely identify in the historically social hierarchy of white. Many of these smaller communities are descendants of Native American tribes and freemen who are experiencing environmental racism from corporations, governments, and businesses. Many of these problems face low-income communities as a whole, but race is often a more reliable indicator of proximity to pollution. These communities are disproportionately burdened with health hazards through policies and practices that force them to live in proximity to sources of toxic waste such as sewage works, mines, landfills, power stations, pipelines, compressor stations, major roads, and emitters of airborne particulate matter. As a result, these communities suffer greater rates of health problems attendant on hazardous pollutants.

The Lambert Compressor station would include two gas-fueled combustion turbines, five microturbines, and ancillary equipment that would increase the Air Pollution that would affect this community as well as the plants and animals around it. People will develop strange cancers and sicknesses from the irritants/and pollutants that are given off. First, I had to look up what exactly a compressor station does, I drove to the closest one to me which is in Rockingham County, NC. They are large industrial facilities that maintain the flow and pressure of natural gas by receiving gas from the pipeline, re-pressurizing it, and sending it back into the pipeline system. I watched this compression station let gas escape. If they are letting this gas escape into the air, what are the issues with that? Well for one explosion, fires, leaks, and spills..... plus fugitive emissions of volatile organic compounds (VOCs) and nitrogen oxides (NOx), as well as other potential exposure threats, such as radon 222 and lead. I researched what these organic compounds are, and I am glad I broke it down so everyone is aware here is what is emitted include: Formaldehyde, benzene, toluene, ethylbenzene, xylene, hydrogen disulfide, carbon monoxide(CO), carbon dioxide (CO₂), sulfur dioxide (SO₂), methane (CH₄).... and other compounds or elements that are toxic, carcinogenic, or neurotoxic, and which are prone to causing major adverse health effects in humans and animals. One, compressor stations are loud. That vapor that is being released is called a blow-down, they can last from 20 minutes to 2-3 hours. The noise is comparable to a commercial jet taking off. They often occur in the middle of the night. The sound of regular compressor station operation has been compared to four diesel locomotive engines running 24/7. Residents as far as a mile away can hear the racket. This humming can cause hearing impairment and cardiovascular problems. I reviewed 40 serious health effects that would be caused by this compressor station. This is serious business for anyone in the area who has asthma, or any COPD related illnesses. This is not good. As a mother, I would be stricken with fear for my children, and I would be sad that I would have to consider moving from my town that has been our ancestral homes for thousands of years.

The DEQ of VA should be ashamed that it is continuing to ignore the enforcement of racial regulations and unjust racial laws on indigenous lands. These oil and gas pipelines are deliberately targeting communities of color for toxic waste facilities, the official sanctioning of the life-threatening presence of poisons and pollutants in our communities, and the history of excluding people of color's opinions on what will and will not affect them. If these pipelines and compressor stations are healthy and do not cause harm, then the executive leaders of the corporations should have them installed in their backyards, that is their property, they should lead by example, and subject themselves and their families to it as well. Be a transformational leader, and lead by example.

As an indigenous person, our traditional homelands in VA and NC transcend boundary lines and our local tribes had treaties that were violated by the European Colonies and after the formation of the United States, our treaties were not even recognized. We never had a concept of owning land, property material things. Traditionally we regarded the **land** as a communal resource, with **ownership** vested in the group rather than in any one individual. We also believed that spiritual forces were everywhere, dwelling in heavenly bodies and in sacred places on the Earth. Spirits lived within plants and animals. However, we were assimilated into European mentalities and here we are today fighting against a pipeline corporation that does not value people, animals, plants, land, or the earth. I really hope that anyone reading this is in a position of authority and power, to continue to protect the people, land, and animals and stop this compressor station and the pipeline from being built.

Crystal Cavalier-Keck, Indigenous Water and Land Protector



On Wed, Feb 3, 2021 at 10:27 AM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:

Good morning Ms. Cavalier

You're in the right place, just send your comment regarding the proposed Lambert Compressor Station directly to me.

Regards,

Anita Walthall

Anita L. Walthall

Air Permit Writer
Department of Environmental Quality
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On Wed, Feb 3, 2021 at 10:10 AM Crystal Cav <criscavalier@gmail.com> wrote:

Hello Ms. Walthall,

How or where I go to submit comments during this open period for the DEQ VA Chatham County Compressor Station?

--



Crystal A Cavalier, MPA, Doctoral Candidate, Univ. of Dayton
Community Organizer | Consultant
Schedule a call with me [HERE](#)

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Crystal A Cavalier, MPA, Doctoral Candidate, Univ. of Dayton



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[Crystal Cavalier Emergency Consulting](#) |
[Epidemic on Missing Murdered Indigenous Women](#)
[Yé sa Né dé wéhe Sappi Qilt ual Eduat ion Gar d 7 Directions of Service - Co Founder](#)
[Indigenous Art Two River Otters](#)
[Childrens, Teens and Youth Clothing and Accessories](#)

 (336) 265-0838
 criscavalier@gmail.com

--
Crystal A Cavalier, MPA, Doctoral Candidate, Univ. of Dayton
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[Indigenous Art Two River Otters](#)
[Childrens, Teens and Youth Clothing and Accessories](#)

 (336) 265-0838
 criscavalier@gmail.com

Archived: Thursday, February 4, 2021 7:51:48 AM
From: [Crystal Cav](#)
Sent: Wednesday, February 3, 2021 10:46:56 AM
To: [Walthall, Anita](#)
Subject: Re: Comments for the DEQ VA Chatham County Compressor Station
Importance: Normal

Thank you, Ms. Walthall,

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Multi-Million dollar corporations such as MVP Southgate and governments are still trying to terminate people who have been living peacefully trying to co-exist in a government that does not value people who aren't of European American descent and falsely identify in the historically social hierarchy of white. Many of these smaller communities are descendants of Native American tribes and freemen who are experiencing environmental racism from corporations, governments, and businesses. Many of these problems face low-income communities as a whole, but race is often a more reliable indicator of proximity to pollution. These communities are disproportionately burdened with health hazards through policies and practices that force them to live in proximity to sources of toxic waste such as sewage works, mines, landfills, power stations, pipelines, compressor stations, major roads, and emitters of airborne particulate matter. As a result, these communities suffer greater rates of health problems attendant on hazardous pollutants.

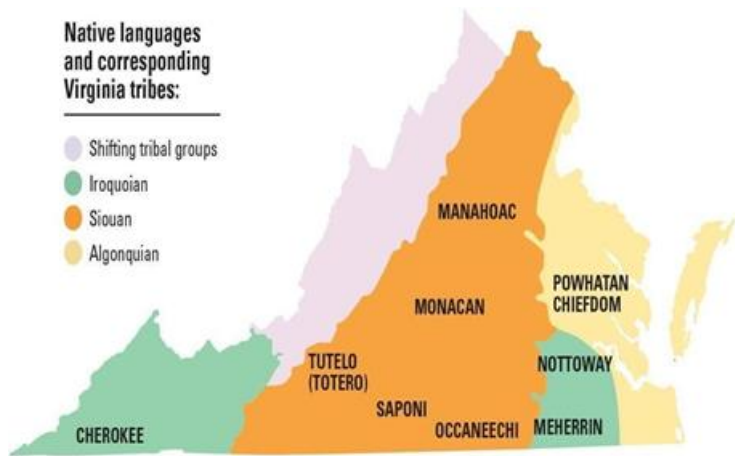
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Crystal Cavalier-Keck, Indigenous Water and Land Protector



On Wed, Feb 3, 2021 at 10:27 AM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:

Good morning Ms. Cavalier

You're in the right place, just send your comment regarding the proposed Lambert Compressor Station directly to me.

Regards,

Anita Walthall

Anita L. Walthall

Air Permit Writer
Department of Environmental Quality
Blue Ridge Regional Office
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Salem, VA 24153
(540) 562-6769

www.deq.virginia.gov

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On Wed, Feb 3, 2021 at 10:10 AM Crystal Cav <criscavalier@gmail.com> wrote:

Hello Ms. Walthall,

How or where I go to submit comments during this open period for the DEQ VA Chatham County Compressor Station?

--

Crystal A Cavalier, MPA, Doctoral Candidate, Univ. of Dayton

Community Organizer | Consultant

Schedule a call with me [HERE](#)

--

Crystal A Cavalier, MPA, Doctoral Candidate, Univ. of Dayton

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[Epidemic on Missing Murdered Indigenous Women](#)

[Yé sa Né dé wáhe Sami Cultural Education Gard 7 Directions of Service - Co Founder](#)

[Indigenous Art Two River Otters](#)

[Childrens, Teens and Youth Clothing and Accessories](#)

 (336) 265-0838

 criscavalier@gmail.com

Archived: Thursday, February 4, 2021 7:51:48 AM
From: [Gerald Featherstone](#)
Sent: Wednesday, February 3, 2021 4:16:57 PM
To: anita.walthall@deq.virginia.gov
Cc: [Haw River Assembly](#)
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Comments on Mountain Valley Pipeline Southgate's Lamberth Compressor Station

Gerald L. Featherstone

117 Penna

Pittsboro, NC, 27312

Dear Sirs:

I, and my family, as well as my friends. come to Pittsylvania County area at least a dozen times a year to spend weekends and longer. We paddle, both calm and white water, we fish, camp in our RV's. We like this lovely, rural and unspoiled areas there in the beginning of the foothills of your lovely state. With its rural foothills flavor, small to medium sized towns, wild streams, forests, parks and the many lovely river to boat, fish. swim in , It's a great place to spend some unwind time soaking up the nice paced life of the area.

When ever we're up there in your lovely state there are almost always two to six families with us. We've come to realized that the Mountain Valley Pipeline was coming through these areas while talking with people, seeing their yard signs. Those area's folks are worried about the damage to their home area, they're very concerned about the pollutants that might leak into their waters both surface and ground. They also worry about eminent domain taking land they don't want to give up. Couple of my friends had that happen. Those things always pose hazards, ruin the landscape usually and don't create any jobs to speak of. Might add a little to local tax bases but not as much as what you'll lose as people stop coming there as the landscape deteriorates.

The company building this project will get most of the good. Looks like we'll be into less dependence on petroleum products by mid century, so you'll have an environment ruined and probably a pipeline abandoned, and lost revenue from vacationers not coming to your state. I've lived with a pipeline near me growing up in North Carolina and it ruined my parents property value they told me. There was one accident there but lucky for us, not a lot of damage was done.

We recommend that you don't allow the Mountain Valley Pipeline let alone the pump station in your lovely state. It will threaten the many streams it will cross, lower property values (and thus the tax base) as well as pollute the viewing and air.

Thank you for your time and attention.

Gerald and Brenda Featherstone

Archived: Friday, February 5, 2021 7:28:37 AM

From: [Betty Byrne Ware](#)

Sent: Thursday, February 4, 2021 3:04:58 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley pipeline permit

Importance: Normal

anita.walthall@deq.virginia.gov

Dear Ms. Walthall,

This letter to you is to request that the MVP Lambert Compressor Station permit be sent to the Virginia Air Pollution Control Board. We need to know what hazardous air pollutants will be emitted from this station, if it is allowed. We need to protect the air quality of the nearby communities.

There are many concerns about this project:

1. It is not needed. There is plenty of natural gas available and we will soon be changing to cleaner and less expensive sources of energy, such as sun and wind power to prevent global warming.
2. The pipeline is being built strictly as a money-maker for Dominion Power.
3. Construction crossing mountain streams and rivers will contaminate water sources for many communities.
4. Virginia is a beautiful state. Why ruin our mountains, considered by many to be the oldest in the world?

Please do not advance this pipeline proposal.

Sincerely yours,

Betty Byrne Ware
(Mrs. H. Hudnall Ware, III)
(804-282-7156)

Archived: Friday, February 5, 2021 7:28:37 AM

From: [Susie Eastridge](#)

Sent: Thursday, February 4, 2021 9:13:26 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

I live in Virginia where I have been working to create a safe environment for all of us and our children to come.

I am writing to request that the draft permit for the MVP Lambert Compressor Station be elevated to the Virginia Air Pollution Control Board. This project needs to be further evaluated due to the lack of information regarding the levels of hazardous air pollutants that would be emitted, putting nearby communities over the limit in terms of risk of adverse health effects.

With the Mainline of the MVP project not anywhere near completion and still needing further permits itself, it does not make sense to approve a permit or create further infrastructure for a project which is already facing uncertainty. I urge you to take these public comments into account and send this permit for a full hearing to the Virginia Air Pollution Control Board in order to address the many concerns surrounding this project.

Susann Eastridge
166 Rappahannock St.
Warrenton, VA 20186

Archived: Friday, February 5, 2021 7:28:37 AM

From: [Patricia Taylor](#)

Sent: Thursday, February 4, 2021 6:16:21 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

In addition to Air pollutants, I noted in the literature they are going to use natural gas to power this very large compression installation, instead of electricity, and will be extremely noisy—especially if the pipes are operating around the clock at near capacity for commercial sales to other countries.

Any homes or businesses nearby will definitely be severely impacted.

Sent from my iPhone

Archived: Saturday, February 6, 2021 11:56:50 AM
From: MJ2612H
Sent: Friday, February 5, 2021 10:51:59 AM
To: anita.walthall@deq.virginia.gov
Subject: MVP Lambert Compressor Station Draft Air Permit
Importance: Normal

Dear Ms. Walthall,

I am writing to request that the draft permit for the MVP Lambert Compressor Station be elevated to the Virginia Air Pollution Control Board where a full public hearing should be conducted before the Board. There is insufficient information regarding the levels of hazardous air pollutants that would be emitted. For example, there were several other hazardous air pollutants listed during the EIS process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit. In addition, the total amount of emission levels from two other nearby Transco compressor stations AND the proposed Lambert facility need to be considered together in determining the risk of adverse health effects.

There are serious health concerns from the proposed Lambert Compressor Station. One is formaldehyde which can increase complications of COPD and asthma as well as lead to pulmonary edema. The proposed station will emit almost 9 lbs of formaldehyde per hour. Another is particulate matter. Emissions in the area would increase by almost 30%. This is likely to increase mortality and hospitalizations among older people with cardiovascular disease and lead to increased rates of pneumonia.

Health issues and hazardous air pollutants have not been adequately considered. Virginia's Air Pollution Control Board needs to conduct a public hearing concerning the permit for the MVP Lambert Compressor Station.

Sincerely,
Mary Harshfield
2612 Robin Hood Rd SE
Roanoke, VA 24014-3422
540-309-8277

email: mj2612h@gmail.com

Archived: Saturday, February 6, 2021 11:56:51 AM

From: [Susie Eastridge](#)

Sent: Friday, February 5, 2021 8:59:49 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

I live in Virginia where I have been working to create a safe environment for all of us and our children to come.

I am writing to request that the draft permit for the MVP Lambert Compressor Station be elevated to the Virginia Air Pollution Control Board. This project needs to be further evaluated due to the lack of information regarding the levels of hazardous air pollutants that would be emitted, putting nearby communities over the limit in terms of risk of adverse health effects.

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Susann Eastridge
166 Rappahannock St.
Warrenton, VA 20186
540-216-7368

Archived: Saturday, February 6, 2021 11:56:51 AM

From: Carolyn

Sent: Friday, February 5, 2021 4:07:05 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

I request that the draft permit for the MVP Lambert Compressor Station be elevated to the Virginia Air Pollution Control Board. This project needs to be further evaluated due to the lack of information regarding the levels of hazardous air pollutants that would be emitted, putting nearby communities over the limit in terms of risk of adverse health effects.

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There is no need for the MVP. Those of us with land anywhere near the pipeline are much opposed to this invasion of our beautiful Virginia countryside. We need and want clean water and air. There is no reason to allow fossil fuel companies to ruin our environment.

Thank you.

Sincerely,

Carolyn Barker

Land owner at 2588 Bishop Rd, Blacksburg VA 24060

Resident in Aldie VA 20105

Archived: Tuesday, February 9, 2021 6:49:12 PM
From: BENJAMIN.CUKER@HAMPTONU.EDU
Sent: Monday, February 8, 2021 6:46:09 PM
To: anita.walthall@DEQ.Virginia.gov
Subject: Mountain Valley Pipeline-Lambert Compressor
Importance: Normal

I oppose the certification of the Mountain Valley Pipeline Lambert Compressor Station. There is no need for this pipeline. Every dollar wasted on fossil fuel is a dollar not invested in wind and solar. True, natural gas is cleaner than coal. Filtered cigarettes are somewhat healthier than unfiltered. Much better to quite smoking. This pipeline will only keep us smoking for that much longer, delaying the switch to green energy.

Benjamin Cuker
Professor of Marine and Environmental Science
Hampton University
Hampton, VA 23668
757 262 7084

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Archived: Tuesday, February 9, 2021 6:49:12 PM

From: Jenkins, Paul R

Sent: Monday, February 8, 2021 1:49:23 PM

To: Walthall, Anita

Subject: Fwd: Comments (DEQ Public Hearing)

Importance: Normal

Attachments:

[Jessie-Compressor.docx](#) ;

----- Forwarded message -----

From: **Jessie Barksdale** <jessie.barksdale7@gmail.com>

Date: Mon, Feb 8, 2021 at 1:41 PM

Subject: Comments (DEQ Public Hearing)

To: <paul.jenkins@deq.virginia.gov>

Attached is my comments for the DEQ Public Hearing today.
Thank you.

Jessie Barksdale

--

Paul R. Jenkins

Regional Air Permit Manager
Virginia Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
540-562-6822

paul.jenkins@deq.virginia.gov

www.deq.virginia.gov

PUBLIC HEARING
Virginia Department of Environmental Quality (DEQ)
February 8, 2021

My name is Jessie L. Barksdale, and I live in Chatham, VA, and my residence is located 6 to 7 miles to the TRANSCO Compressor (located in the Banister District). I am a former member of the Pittsylvania County Board of Supervisors. I served from 2012 to 2017 (for the Banister District), and I was Chairman of the Board in 2014, and 2016.

A lot has happened since then. I recall when we all were anxious about the pipeline route. Now, we are having a “Public Hearing” for Mountain Valley, LLC to construct and operate a natural gas compressor Station known as Lambert Compressor Station. Our citizens have issues, questions, and they deserve answers.

This year (2021) I am a candidate for the Pittsylvania County Board of Supervisors. MVP is one of my priorities, and it should be an issue for the Board also. Whether I am elected or not, I will continue to work with the citizens in Banister District.

Thank you for the opportunity to speak.

Jessie L. Barksdale
1604 Abbott Place
Chatham, VA 24531
H: (434) 432-2124

jessie.baksdale7@gmail.com

Archived: Tuesday, February 9, 2021 6:49:12 PM

From: [Tiona McKinney](#)

Sent: Monday, February 8, 2021 7:06:27 PM

To: anita.walthall@deq.virginia.gov

Subject: MVP Public Comment

Importance: Normal

I am in opposition of the air permit for the compressor station. Like so many who made comments about the validity of the company who wishes to seek air permits, it is too soon and the risk is too great! Please pause the approval of this permit. Give more time to the process, test and inspect the environmental impacts in this area.

Why was there no other location for this? As well as the question why are we increasing our dependency on dirty energy? The people who are in support for this project do not live close to the proposed station. Imagine being told that you have nothing to worry about from people who will never wake up to deal with a problem. This specific area already has a huge uranium deposit. We don't need more issue brought to this area.

500 jobs is not enough to sacrifice environmental health. Please consider the long term environmental impacts for this project. We don't need to depend on outdated technology when we should be moving forward.

Thank you for taking your time to listen. I hope you act in favor of the people and the environment and not corporations and money.

--

It was not luck. I was born with It!

Archived: Tuesday, February 9, 2021 6:49:13 PM

From: [Leech, Irene](#)

Sent: Monday, February 8, 2021 8:55:56 PM

To: anita.walthall@DEQ.Virginia.gov

Subject: Nice Job!

Importance: Normal

You all have done a really nice job running this hearing. Virtual is difficult. Thank you.

Irene Leech

Archived: Tuesday, February 9, 2021 6:49:13 PM

From: [William Limpert](#)

Sent: Monday, February 8, 2021 9:08:42 PM

To: [Walthall, Anita](#); paul.jenkins@deq.virginia.gov; kevin.vaughn@deq.virginia.gov

Subject: Thank You

Importance: Normal

Anita/Paul/Kevin:

Thank you for a well run and informative hearing on the proposed Lambert compressor station.

Thank you as well for your public service.

Please stay safe, healthy, and strong.

Bill

Archived: Thursday, February 11, 2021 9:56:20 AM

From: [Robert Ukeiley](#)

Sent: Tuesday, February 9, 2021 12:39:38 AM

To: anita.walthall@deq.virginia.gov

Subject: MVP Southgate Project Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall:

In AECOM's Air Quality Dispersion Modeling Report, AECOM says that they did not consider the sub-zero scenario in the 1-hour averaging time NOx modeling because of the "intermittent source exemption." However, the DEQ Modeling Memo and the Draft engineering analysis make no mention of an intermittent source exemption.

Can you tell me what the "intermittent source exemption" is?

Thanks

Robert

Robert Ukeiley
Senior Attorney – Environmental Health
Center for Biological Diversity
1536 Wynkoop St., Ste. 421
Denver, CO 80202
(720) 496-8568
rukeiley@biologicaldiversity.org

Archived: Thursday, February 11, 2021 9:56:20 AM

From: Tiona McKinney

Sent: Tuesday, February 9, 2021 10:13:59 AM

To: Walthall, Anita

Subject: Re: MVP Public Comment

Importance: Normal

Tiona McKinney

1413 Spotsylvania St, Richmond, VA 23223

(314)769-1651

On Tue, Feb 9, 2021 at 8:06 AM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:

Thank you for your comment.

All written commenters need to provide their name, **address**, and **telephone number**. Please provide your mailing address and telephone number for this written record.

Anita Walthall

Anita L. Walthall

Air Permit Writer

Department of Environmental Quality

Blue Ridge Regional Office

[901 Russell Dr.](#)

[Salem, VA 24153](#)

(540) 562-6769

www.deq.virginia.gov

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- Please update your records -

On Mon, Feb 8, 2021 at 7:06 PM Tiona McKinney <tiona.mckinney@gmail.com> wrote:

I am in opposition of the air permit for the compressor station. Like so many who made comments about the validity of the company who wishes to seek air permits, it is too soon and the risk is too great! Please pause the approval of this permit. Give more time to the process, test and inspect the environmental impacts in this area.

Why was there no other location for this? As well as the question why are we increasing our dependency on dirty energy? The people who are in support for this project do not live close to the proposed station. Imagine being told that you have nothing to worry about from people who will never wake up to deal with a problem. This specific area already has a huge uranium deposit. We don't need more issue brought to this area.

500 jobs is not enough to sacrifice environmental health. Please consider the long term environmental impacts for this project. We don't need to depend on outdated technology when we should be moving forward.

Thank you for taking your time to listen. I hope you act in favor of the people and the environment and not corporations and money.

--

It was not luck. I was born with It!

--

It was not luck. I was born with It!

Archived: Thursday, February 11, 2021 9:56:20 AM

From: Jenkins, Paul R

Sent: Tuesday, February 9, 2021 2:59:33 PM

To: Walthall, Anita

Subject: Fwd: Reminder: Public Hearing for Mountain Valley Pipeline, LLC Lambert Compressor Station starts in 1 Day

Importance: Normal

----- Forwarded message -----

From: NAN GRAY <soilwork@pemtel.net>

Date: Tue, Feb 9, 2021 at 2:57 PM

Subject: Re: Reminder: Public Hearing for Mountain Valley Pipeline, LLC Lambert Compressor Station starts in 1 Day

To: paul jenkins <paul.jenkins@deq.virginia.gov>

Cc: Nan Gray <soilwork@pemtel.net>

Good afternoon.

I listened to the Air Quality meeting last night by telephone. I was always muted and you could not hear that I wanted to speak to the group, now I shall have to write.

I thought comments sounded overwhelmingly opposed with significant reasons to deny Mountain Valley Pipeline an Air Quality permit. None of the arguments for construction of MVP Lampert Compressor Station were significant regarding air protection.

Thank you for consideration of telephone "viewers" who cannot connect to internet.

Nan Gray

From: "DEQ Virginia1" <customercare@gotowebinar.com>

To: "Nan Gray" <soilwork@pemtel.net>

Sent: Sunday, February 7, 2021 5:59:43 PM

Subject: Reminder: Public Hearing for Mountain Valley Pipeline, LLC Lambert Compressor Station starts in 1 Day



This is a reminder that "Public Hearing for Mountain Valley Pipeline, LLC Lambert Compressor Station" will begin in 1 Day on:

Mon, Feb 8, 2021 6:00 PM - 10:00 PM EST

Add to Calendar: [Outlook® Calendar](#) | [Google Calendar™](#) | [iCal®](#)

Please send your questions, comments and feedback to: paul.jenkins@deq.virginia.gov

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Nan Gray
AOSE, Licensed Professional Soil Scientist
Soil Works, Inc.
P.O. Box 3
Newport, VA 24128
(540) 544-7791
soilwork@pemteln.net

As always, save your soil

--

Paul R. Jenkins

Regional Air Permit Manager
Virginia Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
540-562-6822

paul.jenkins@deq.virginia.gov

www.deq.virginia.gov

logo-eb5e13f6-e4a9-43a0-b044-9e8394a58d25.jpeg



VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Archived: Thursday, February 11, 2021 9:56:20 AM
From: Michael James-Deramo
Sent: Tuesday, February 9, 2021 4:56:47 PM
To: anita.walthall@deq.virginia.gov
Subject: Comment regarding Lambert Compressor Station
Importance: Normal

Hello,

My name is Michael James-Deramo. I commented during the public hearing last night in opposition to the permitting of the Lambert Compressor Station. I mentioned several studies regarding the danger of compressor stations, a pattern of violating regulations, and the findings that danger has often been understated.

I am including these studies here to be reviewed by the DEQ and included in your decision on whether to permit this project.

[Air Emissions from Natural Gas Facilities in New York State, Pasquale N. Russo and David O. Carpenter](#)

[Health Effects Associated with Stack Chemical Emissions from NYS Natural Gas Compressor Stations: 2008-2014 A Technical Report Prepared for the Southwest Pennsylvania Environmental Health Project](#)

[Air concentrations of volatile compounds near oil and gas production: a community-based exploratory study by Gregg P Macey, Ruth Breech, Mark Chernaik, Caroline Cox, Denny Larson, Deb Thomas, David O Carpenter](#)

[Birth Outcomes and Maternal Residential Proximity to Natural Gas Development in Rural Colorado, Lisa M. McKenzie , Ruixin Guo , Roxana Z. Witter , David A. Savitz , Lee S. Newman , and John L. Adgate](#)

[Residential Proximity to Oil and Gas Development and Birth Outcomes in California: A Retrospective Cohort Study of 2006–2015 Births](#)

Thank you

--

Michael James-Deramo
mjdishere00@gmail.com
(540)250-7632 cell

Archived: Thursday, February 11, 2021 9:56:20 AM

From: Michael James-Deramo

Sent: Tuesday, February 9, 2021 6:50:46 PM

To: Walthall, Anita

Subject: Re: Comment regarding Lambert Compressor Station

Importance: Normal

Michael James-Deramo

1455 Mount Tabor Rd, Blacksburg VA

5402507632

On Tue, Feb 9, 2021, 6:48 PM Walthall, Anita <anita.walthall@deq.virginia.gov> wrote:

Michael James-Deramo,

All commenters need to include their name, **mailing address**, and telephone number when submitting written comments. Please provide a mailing address for this public comment record.

Thank you for submitting your comment.

Anita Walthall

Anita L. Walthall

Air Permit Writer

Department of Environmental Quality

Blue Ridge Regional Office

901 Russell Dr.

Salem, VA 24153

(540) 562-6769

www.deq.virginia.gov

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- Please update your records -

On Tue, Feb 9, 2021 at 4:56 PM Michael James-Deramo <mjdishere00@gmail.com> wrote:

Hello,

My name is Michael James-Deramo. I commented during the public hearing last night in opposition to the permitting of the Lambert Compressor Station. I mentioned several studies regarding the danger of compressor stations, a pattern of violating regulations, and the findings that danger has often been understated.

I am including these studies here to be reviewed by the DEQ and included in your decision on whether to permit this project.

[Air Emissions from Natural Gas Facilities in New York State, Pasquale N. Russo and David O. Carpenter](#)

[Health Effects Associated with Stack Chemical Emissions from NYS Natural Gas Compressor Stations: 2008-2014 A Technical Report Prepared for the Southwest Pennsylvania Environmental Health Project](#)

[Air concentrations of volatile compounds near oil and gas production: a community-based exploratory study by Gregg P Macey, Ruth Breech, Mark Chernaik, Caroline Cox, Denny Larson, Deb Thomas, David O Carpenter](#)

[Birth Outcomes and Maternal Residential Proximity to Natural Gas Development in Rural Colorado, Lisa M. McKenzie , Ruixin Guo , Roxana Z. Witter , David A. Savitz , Lee S. Newman , and John L. Adgate](#)

[Residential Proximity to Oil and Gas Development and Birth Outcomes in California: A Retrospective Cohort Study of 2006–2015 Births](#)

Thank you

--

[Michael James-Deramo](#)
mjdishere00@gmail.com
[\(540\)250-7632](tel:(540)250-7632), cell

Michael James-Deramo
United States Census Bureau

Archived: Thursday, February 11, 2021 9:52:06 AM
From: Kelly Paduch
Sent: Wednesday, February 10, 2021 5:36:20 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Hi Anita:

I'm writing in regards to the proposed Lambert Compressor Station to ask that the issue be elevated to the Air Pollution Control Board. As an outdoor enthusiast, and a resident of Virginia for the last 10 years, I am requesting a public hearing before the Air Board due to a number of environmental and health concerns.

The draft permit as it stands contains a serious lack of information regarding Hazardous Air Pollutants. Other hazardous pollutants such as benzene, toluene and xylenes must be subject to the same level of limitations as formaldehyde.

The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%. These chronic levels of air pollution can have detrimental health effects on the local population, which is significantly older than the state and national averages. Health risks include increased rates of cardiorespiratory mortality and hospitalization, and reduced white blood cell counts (the most common indicator for leukemia risk). If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants.

Additionally, DEQ's notification processes are increasingly reliant on electronic outreach, due to the current Covid health crisis. This is inappropriate as many of the impacted localities do not have consistent internet access. Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.

Given that the project is missing a major state level permit (a Clean Water Act 401 water certification from North Carolina), this pipeline should **not** be moving forward **at all**, now or ever. Please prioritize the health and well-being of our vulnerable communities and our environment, both of which are under immense pressure to survive.

Thank you for your time.

Kelly Paduch
526 Collicello St
Harrisonburg, VA 22802

--
Kelly Paduch
Women's Ambassador
Rocktown Bicycles
kelly@rocktownbicycles.com
540-689-0070

Archived: Thursday, February 11, 2021 9:52:06 AM

From: [Jess Daddio](#)

Sent: Wednesday, February 10, 2021 9:27:53 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Hi Anita:

I'm writing in regards to the proposed Lambert Compressor Station to ask that the issue be elevated to the Air Pollution Control Board. As an outdoor enthusiast, born and raised and still living in Virginia, I am requesting a public hearing before the Air Board due to a number of environmental and health concerns.

The draft permit as it stands contains a serious lack of information regarding Hazardous Air Pollutants. Other hazardous pollutants such as benzene, toluene and xylenes must be subject to the same level of limitations as formaldehyde.

The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%. These chronic levels of air pollution can have detrimental health effects on the local population, which is significantly older than the state and national averages. Health risks include increased rates of cardiorespiratory mortality and hospitalization, and reduced white blood cell counts (the most common indicator for leukemia risk). If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants.

Additionally, DEQ's notification processes are increasingly reliant on electronic outreach, due to the current Covid health crisis. This is inappropriate as many of the impacted localities do not have consistent internet access. Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.

Given that the project is missing a major state level permit (a Clean Water Act 401 water certification from North Carolina), this pipeline should **not** be moving forward **at all**, now or ever. Please prioritize the health and well-being of our vulnerable communities and our environment, both of which are under immense pressure to survive.

Thank you for your time.

Jess Daddio
36 Shenandoah Ave
Harrisonburg, VA 22802

--

Jess Daddio

writer • photographer • videographer

540-247-0998

jessdaddio.com

[Facebook](#)

[Instagram](#)

Archived: Tuesday, February 16, 2021 7:43:05 AM
From: Cynthia Munley
Sent: Friday, February 12, 2021 7:48:09 AM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Name: Cynthia Munley
425 Roanoke Boulevard
Salem, VA 24153
540. 389 8915

1. A full hearing in front of the Virginia Air Pollution Control Board is needed because of the severe consequences of adding another compressor station in this location.
2. This matters to me because everything is wrong concerning any permitting for the MVP's proposed compressor station in Pittsylvania County. The project makes no sense on every level. It is even a loss for the companies funding it and it is likely to be unsuccessful. I wish that no additional environmental damage be incurred for this corrupt project. Permitting a compressor station when MVP is likely to be a failed project and pipeline to nowhere would further expose the irresponsibility of the state of Virginia for wrongly permitting MVP at every juncture. MVP is being challenged with seven legal suits and recently failed to get a needed variance from FERC, which with a new Chair who sees MVP as an overbuilt, unnecessary pipeline, will likely further delay and impede this project. MVP does not have a viable way to cross water bodies. Using individual permits, it is likely to be challenged at every turn because the 42-inch mammoth pipeline has no way to cross water bodies without violating the Clean Water Act.

Comments:

Cumulative impacts make the suitability of the proposed location for the Lambert Compressor Station. If built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and hazardous air pollutants.

Health concerns

- Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema.
- MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.
- The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%.
- The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization.
- Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia.
- In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

Noise

- The noise pollution resulting from 208 weekly startups and shutdowns for both the station's turbines would create unacceptable levels of air pollution emissions and significant noise impacts.

Environmental Justice concerns

Genuine and accurate information discrepancies exist between the information provided by MVP and the EJ Analysis Report and what was communicated in MVP's final permit application. If this is the end of the review process, it is altogether likely that the EJ issues will be challenged in court. Although four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site, MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius. MVP's information was cherry-picked and will be challenged. Best to stop this permit here.

Procedural concerns:

Although DEQ's notification processes rely on electronic outreach, the impacted localities do not have consistent internet access. The outreach timeline should have been earlier and conformed to Virginia's 2020 Environmental Justice Act.

During the public information session on Jan 7, 2021 regarding the timeline for approval, it was noted that a Clean Water Act 401 water certification from North Carolina is missing and, DEQ staff acknowledged that they possibly should *NOT* be moving forward.

The completion rates for construction of the mainline MVP project that the developer included in the draft permit are significantly overstated, and could unfairly influence decision makers reviewing the permit. The most difficult and contested portions of the MVP have yet to be constructed making MVP's claim of 92% completion highly questionable. MVP does not use "full to restoration" percentage complete, instead relying on any preconstruction or ground-disturbing activity to inflate numbers. With the Mainline nowhere near completed, there is no need to permit or create infrastructure for a project with such uncertainty.

Wait for new census data with the most up to date information.

Archived: Tuesday, February 16, 2021 7:44:15 AM

From: [Ryan Wesdock](#)

Sent: Sunday, February 14, 2021 2:00:27 PM

To: anita.walthall@deq.virginia.gov

Subject: Public Comment on the Lambert Compressor Station

Importance: Normal

Attachments:

[Comment on Lambert Compressor Station.docx](#) ;

Hello,

I would like to submit the following as public comment on the air permit for the Lambert Compressor Station.

--

Thank You For Your Time,

Ryan Wesdock

Hello,

I am writing to you today regarding the air permit for the Mountain Valley Pipeline (MVP) Lambert Compressor Station. I have several concerns about the permit.

First, permitting for the compressor station seems inappropriate given the outstanding legal challenges to the MVP mainline. It is currently lacking a 401c water quality certification in North Carolina, as well as individual water crossing permits in Virginia.

Second, the permit does not seem to give adequate weight to Environmental Justice (EJ) concerns, nor take in the cumulative impact of the proposed station in conjunction with existing Transco compressor stations. Four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius. Any EJ impacts would be compounded by the presence of the existing compressor stations.

Third, the permit does not adequately address health concerns. In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Yet, benzene does not appear in this permit. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk. In addition, MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations. Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema. Such levels should be concerning.

Thank You,
Ryan Wesdock
703-888-9852
151 Spruce Run Rd, Newport, VA 24128

Archived: Friday, February 19, 2021 7:33:30 AM
From: [Lynn Godfrey](#)
Sent: Thursday, February 18, 2021 3:30:09 PM
To: david.paylor@deq.virginia.gov; citizensboard@deq.virginia.gov
Cc: anita.walthall@deq.virginia.gov; mike.dowd@deq.virginia.gov
Subject: MVP Air Permit Application #21652
Importance: Normal


Dear Gentleman:

Mountain Valley Pipeline is proposing a compressor station in Pittsylvania County, VA in the historical town of Chatham for the purpose of transporting fracked gas to the proposed MVP Southgate pipelines in NC. They have submitted an application for a required air permit to the Virginia Department of Environmental Quality (DEQ). This process requires an environmental justice assessment and screening to determine that no one community disproportionately bears the burden of the environmental impact risks associated with this poisonous fossil fuel infrastructure buildout.

In September 2020, MVP submitted their revised air permit application to DEQ to include the legally required environmental justice assessment and screening acquired through an independent third party consultant - Land and Heritage Consultants, LLC, led by its owner, Dr. Alexa Lawrence. In their September revised application, MVP outlined the findings of the report, represented as appendix A. However, the findings MVP outlined were an exaggerated misrepresentation from that of the consultant's attached report, appendix A in the application. The misrepresentation centers on three critical areas of the screening: the radius methodology; the extension of meaningful outreach to fenceline and frontline communities; and the conclusion of the findings that addresses disproportionate community burden.

These discrepancies represent significant deficiencies to a just and fair process to the degree that the attached letter and its signatories are requesting DEQ to halt this air permitting process and require the MVP to resubmit a new air permit application with an adequate environmental justice assessment reflecting truthful finding based on accurate data and methods.

Sincerely,
Lynn Godfrey

 [Lambert CS_AirBoard_Signon Ltr-eb.docx](#)

--
□ **Lynn A. Godfrey**
Community Outreach Coordinator, Virginia Chapter
Stop the Pipelines
Pronouns: She/ Her/ Hers
[801 Boush Street, Ste. 200](#)
[Norfolk, VA 23510](#)
[757.305.8284](tel:757.305.8284) (m)
Important Notice: All Sierra Club offices are closed due to concerns with COVID-19. Staff are scheduled to work remotely until June 10. Please learn more about protecting yourself and others from COVID-19 [here](#).

"Our only hope today lies in our ability to recapture the revolutionary spirit and go out into a sometimes hostile world declaring eternal hostility to poverty, racism, and militarism." And to this we can add environmental justice.

MLK, Jr. - 1967

February 18, 2021

Via Email

Mr. David K. Paylor, Director
Virginia Department of Environmental Quality
1111 E. Main Street, Suite 1400
Richmond, VA 23219
David.paylor@DEQ.Virginia.gov

Mr. Roy A. Hoagland, Chair
Virginia Air Pollution Control Board
Care of: Office of Regulatory Affairs
P. O. Box 1105
Richmond, VA 23218
CitizensBoards@DEQVirginia.gov

Dear Gentlemen:

We appreciate and welcome your stated commitment to the environmental justice processes that the Department of Environmental Quality (“DEQ”) and the Air Pollution Control Board (“the Board”) have embarked upon to ensure equity for all our communities. We hope high standards are maintained in the permitting process to guarantee this commitment in carrying out your mission.

On behalf of the undersigned groups, Sierra Club’s 20,000-plus members in Virginia, and front-and fence-line and impacted communities, we write to share our concerns about Mountain Valley Pipeline, LLC’s (MVP) application for an air permit in Chatham, VA (Permit No. 21652). We hope the Board upholds due diligence and examines in detail the air permit application from MVP for its proposed Lambert Compressor Station. Several issues have already arisen that raise concerns regarding whether this process will be just and equitable.

At DEQ’s request or recommendation, MVP contracted a consultant to conduct an environmental assessment of frontline communities most impacted by the proposed compressor station. Land and Heritage Consultants, LLC conducted the environmental assessment this past summer (2020) based on certain presumptions accepted by MVP, according to language in the final report. However, in its September 2020 revised application to DEQ, MVP deviated from these presuppositions. Three that stand out are:

- the distance of the communities assessed from the compressor station site;
- the outreach to the community; and
- the conclusion of the consultant’s report.

As noted in Dr. Lawrence’s (the consultant) final report, the areal assessment includes the 3-mile fenceline community “radius reflected in currently published literature (e.g., air modeling or noise studies).” But “[r]ather than limit the areal extent of our review to the immediate 3-mile

‘fenceline community’ radius,” the report “identified environmental justice communities at a broader scale, extending our review to connected communities even beyond the points of expected direct impact.” MVP agreed to assess impacts at this distance.

However, in its September 2020 revised air permit application to DEQ, in direct contrast to the consultant report, MVP used only a 1-mile radius to assess impacts, stating that “[a] 1-mile radius around the facility was selected as the study area because it encompasses the population most likely to be impacted.... Air modeling confirms that use of a 1-mile radius is reasonable and appropriate.” Conversely, the subject matter expert, i.e., the consultant contracted by MVP, stated:

We use the term “fenceline communities” in this report as referring to communities within a 3-mile radius of the station, consistent with definitions found in the environmental justice literature.

This discrepancy in assessment of “fenceline” communities should be clarified by the Board and DEQ before the hearing. A uniform and standard definition of “fenceline” communities by the Board and DEQ is warranted based on predominate environmental justice practices and literature.

In addition, there is a clear contrast between the consultant’s and MVP’s idea of acceptable community outreach. Dr. Lawrence, from the onset of the study, acknowledges challenges related to community outreach. Factors limiting outreach during the April – August 2020 timeframe included the coronavirus pandemic hindering movement and thus impacting in-person interviews, as well as the social justice upheaval in the country after the murder of George Floyd. The consultant stated the following in relation to George Floyd’s murder and the commemoration of Bloody Monday in Danville as impediments to conducting meaningful outreach:

Ongoing restrictions as a result of both crises led us to shift the entirety of our interviews to phone or Skype as of July 1, 2020. Our only physical visit to Pittsylvania County and the proposed Station site (and surrounding towns, etc.) took place on August 26, 2020 and did not entail any person-to-person contact.

Dr. Lawrence concluded that these limitations hindering outreach to community members did not meet “standards academic of inquiry” and “recommend[ed] strongly that Mountain Valley continue targeted and thoughtful outreach to impacted communities and individuals through the public participation, permitting and construction process.”

Finally, a clear difference exists between MVP’s and the consultant’s conclusion on the impact and potential for disproportionate health risk burdens. MVP asserts that no cumulative burden from existing sources will have a disproportionate burden on fenceline communities. The consultant, on the other hand, found:

3 Mile Fenceline Buffer Based on the broad definitions of the Virginia Environmental Justice act, all census tracts within a 3-mile fenceline buffer are considered environmental justice communities. The vulnerability of these communities to disproportionate negative impacts will require special consideration in the planning and siting process that is sensitive to the needs and concerns of the communities. We recommend that Mountain Valley identify and plan to avoid or mitigate any disproportionate impacts resulting from compressor station construction and operation to domains of culture and lifeways, as well as to community health, food access, and critical service provision.

Due to these significant discrepancies between the consultant's report and the information ultimately submitted by MVP to the DEQ, including the distance of the communities assessed from the proposed site, the outreach to the community, and the conclusion of the consultant's report, we respectfully ask that the permit application process be halted at this time, as the information which it contains is inaccurate and incomplete. The content of the applicant's Environmental Analysis is in question, so its application before the DEQ should not currently be considered.

We ask that you:

1. pause the open comment period;
2. obtain clarification from the applicant as to why the consultant's report is inaccurately presented within the current application, and
3. have the applicant re-submit its application, only after the DEQ has confirmed that Environmental Justice information is updated and more accurately represents the findings of the consultant report. Should the DEQ find that the updated information does not meet the qualifications for EJ analysis and community outreach, as required by law, the DEQ can choose to deny the application, or ask MVP to reapply. Any new application to be reviewed must have a 90-day public comment period and should appear before the full Air Pollution Control Board.

Thank you for your timely consideration of this request.

Cc: Anita Walthall (Anita.Walthall@deq.virginia.gov), DEQ Blue Ridge Office, Salem, VA 24153

Sincerely,
Sierra Club Virginia Chapter

Concerned Citizens of Charles City County (C5)
NRV Sierra Club, Chair
Chesapeake Climate Action Network
ARTivism Virginia
Friends of Buckingham
Preserve Montgomery County VA
Protect Our Water Heritage Rights
National Parks Conservation Association
Preserve Salem
Renewal of Life Trust
Virginia Organizing
Mothers Out Front - Roanoke
Mothers Out Front - New River Valley
Sierra Club Virginia Chapter
Oil Change International
The Ecological Justice Initiative
Richmond Interfaith Climate Justice League
Appalachian Voices
Haw River Assembly
Protect Our Commonwealth
Silverlining Farm
Elizabeth Jone, Pittsylvania County
Anderson Jones, Pittsylvania County
Anita Royston - Pittsylvania County

Archived: Monday, February 22, 2021 7:35:57 AM

From: [Friederich Limbach](#)

Sent: Friday, February 19, 2021 8:34:28 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Dear Mrs. Walthall,

I (Dr. Friederich Limbach, 703 Crimson Sage Ln, Cary NC 27519) write to you today to submit my comments related to the Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit.

The draft permit raises serious questions with regards to the environmental justice impacts:

The permit's environmental justice screening was conducted using census tracts, not the more accurate census block data and therefore, the project's real impact may be underestimated. Because of the large size of census tracts and the tendency for smaller population clusters and pollution hotspots to be hidden, an environmental justice screen is a tool with limited precision in rural areas such as the one in question here.

There are serious discrepancies between the information MVP's consultant provided in the environmental justice Analysis Report, and what MVP ultimately communicated in its final permit application. Given these disparities, it is unclear what the next steps of environmental justice review will be. If this is the end of the review process, without additional responsibilities for outreach leading to meaningful engagement, the consultants assessment was largely ineffective if not even ignored. The review is still treated as a box checking exercise without taking the recommendation to heart.

Four communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius.

Thanks you for taking my concerns and commentary into account,

Dr. Friederich Limbach

Archived: Tuesday, February 23, 2021 7:27:20 AM

From: [NAN GRAY](#)

Sent: Monday, February 22, 2021 10:20:59 AM

To: [walthall](#); [Nan Gray](#)

Subject: mvp NO Lampert Compressor station

Importance: Normal

Good morning,

No to the Lampert Compressor station. North Carolina does not want MVP in their state. Period. No NEED for the mvp. No NEED for Lampert Compressor station. No NEED to destroy any more ground for mvp. No NEED for fracked gas and all the toxic and radioactive parts of mvp, too.

Can we just let mvp die? Why are you propping them up with hope? Abandon mvp, abandon Lampert Compressor Station. Just say No to mvp. It is killing me.

Thank you,

Nan Gray, LPSS

--

Nan Gray

AOSE, Licensed Professional Soil Scientist

Soil Works, Inc.

P.O. Box 3

Newport, VA 24128

(540) 544-7791

soilwork@pemtel.net

As always, save your soil

Archived: Tuesday, February 23, 2021 7:27:21 AM

From: [NAN GRAY](#)

Sent: Monday, February 22, 2021 9:38:33 AM

To: [walthall](#); [Nan Gray](#)

Subject: mvp Lampert Compress NO No NO

Importance: Normal

Good morning.

I wish to comment on the Lampert Compressor station that involves Mountain valley pipeline project. MVP is dead, do not extend it to Lampert compressor station. Everything healthy is AGAINST another damn compressor station. You know these put garbage in human bodies. You already this. Stop mvp, abandon the rotten route, deny Lampert compressor station and let us get a good lung full of air, not compressor station toxic snot aerosolized.

The soil is not to be killed willynilly, but Lampert Compressor would spew enough toxins that it would kill the soil creatures that live near the site. Also, how stupid to put two big compressors stations together. Why do that to humans? Are they supposed move away for an uninvited permanent guest? No.

Good morals dictate your decision to rightfully deny Lampert Compressor station and deny mvp anymore time. Let this project go away.

Best to your health and mind,

Nan Gray

--

Nan Gray

AOSE, Licensed Professional Soil Scientist

Soil Works, Inc.

P.O. Box 3

Newport, VA 24128

(540) 544-7791

soilwork@pemt.net

As always, save your soil

Archived: Tuesday, February 23, 2021 7:27:21 AM
From: [Stockton Maxwell](#)
Sent: Monday, February 22, 2021 8:01:47 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Hi Ms Walthall,

I am writing to express my concern over the Air Permit for the MVP Lambert Compressor Station. My points are as follows:

Lack of information regarding Hazardous Air Pollutants (HAPs)

- The only hazardous air pollutant that is subject to hourly and yearly emission limits in the draft permit is formaldehyde.
- There were several other hazardous air pollutants listed during the Environmental Impact Statement process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit.
- Factoring in the emission levels of hazardous air pollutants generated by the two Transco compressor stations, the cumulative impact from those and the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby community over the limit in terms of risk of adverse health effects.

Health concerns

- Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema.
- MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.
- The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%.
- The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization.
- Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia.
- In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

Environmental Justice concerns

- The permit's EJ Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated.
- There are serious discrepancies between the information MVP's consultant provided in the EJ Analysis Report, and what MVP ultimately communicated in its final permit application.
- Four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius.
- There are serious and significant discrepancies between the information provided in the EJ Analysis Report conducted for MVP, and what MVP ultimately communicated in their final version of the permit application.

Noise pollution concerns

- MVP has applied to have weekly startups and shutdowns for both the station's turbines, which would result in 208 events per year.

Each event would create spikes in air pollution emissions, as well as significant noise impacts.

- It is unclear how MVP plans to coordinate with the two existing Transco compressor stations in order to stagger these events so as to reduce the amount of air and noise pollution and harm on nearby communities.

Cumulative Impact Concerns

- DEQ should take cumulative impacts and existing levels of air pollution into consideration when evaluating the suitability of the proposed location for the Lambert Compressor Station.
- If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants.

	Title V	Combined Emissions(tons/year)	Transco 165/166(tons/year)	Lambert (Air Permit)
NOx	yes	628.91	616.85	12.06
CO	yes	408.5	391.48	17.02
VOC	yes	112.358	109.48	2.878
PM		45.98	35.97	10.01
PM 10		45.98	35.97	10.01
PM 2.5		46.418	35.97	10.448
SOx		19.1	13.9	5.2

Procedural concerns

- Owing to the current Covid health crisis, DEQ's notification processes are increasingly reliant on electronic outreach. This is inappropriate as many of the impacted localities do not have consistent internet access. Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.
- During the public information session on Jan 7, 2021 regarding the timeline for approval, members of the public flagged that the timeline seems set by the applicant. As the project is missing a major state level permit (a Clean Water Act 401 water certification from North Carolina), DEQ staff acknowledged that they possibly should NOT be moving forward.
- The completion rates for construction of the mainline MVP project that the developer included in the draft permit are significantly overstated, and could unfairly influence decision makers reviewing the permit. MVP does not use "full to restoration" percentage complete, instead relying on any preconstruction or ground-disturbing activity to inflate numbers.
- Among other legal challenges, the MVP mainline is currently unable to cross many miles of water bodies and MVP has announced to Va. DEQ that they will file for an individual permit which would add substantial delay.

Sincerely,
Stockton Maxwell
4951 Preston Forest Dr, Blacksburg, VA 24060
304-280-8565

--
R. Stockton Maxwell, PhD
Radford University, Associate Professor of Geospatial Science
Sierra Club, Virginia Chapter Executive Committee
<https://sites.google.com/view/treeringist/home>

<https://twitter.com/StocktonMaxwell>

Archived: Thursday, February 25, 2021 4:08:49 PM

From: [Scott Noonkester](#)

Sent: Thursday, February 25, 2021 9:47:52 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline

Importance: Normal

To Whom it May Concern:

Please give MVP permits and licensees as required in order for MVP to finish this project. Our beautiful mountains and streams will not be "destroyed". Roads and interstate highways cut way bigger paths through our mountains than this pipeline ever will. I would rather have this gas running through pipelines than running down my roads and highways. Many communities along the route have asked for and will receive a hook up which will lead to a steady supply and could possibly be the thing that wins them a bid for an industry location.

I have lived in Montgomery County all of my life and I am in favor of the MVP. I have always voted Democrat but for this issue I am swinging the other way.

If some of this gas goes overseas, fine by me.

Look at what just happened in Texas. If my options are more gas or less gas here in Virginia, I would rather have more gas.

Regards

Scott Noonkester

203 Wilson Avenue

Blacksburg, VA 24060

540-320-6464

Archived: Saturday, February 27, 2021 3:35:57 PM

From: [Ellen Brown](#)

Sent: Friday, February 26, 2021 9:48:53 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Please send the Lambert Compressor Station Draft Air Permit to the State Air Pollution Control Board for final approval. It is only prudent that all elements of this project be carefully evaluated before it's approval.

Thank you.

Ellen Brown

2903 Rosalind Ave., SW

Roanoke, VA 24014

540-345-1258

Archived: Saturday, February 27, 2021 3:35:59 PM
From: [Kris Peckman](#)
Sent: Friday, February 26, 2021 11:11:12 AM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

This project cannot be considered minor, as its effects will be combined with those from two existing compressor stations nearby. This project cannot be considered minor and must be brought before the full Air Board.

--

Kristin Peckman
8131 Webster Dr.
Roanoke, VA 24019
(540)366-7780

Archived: Sunday, February 28, 2021 9:25:17 PM
From: Bruce Coffey
Sent: Saturday, February 27, 2021 3:52:02 PM
To: anita.walthall@deq.virginia.gov
Cc: elle@chesapeakeclimate.org
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Request for Public Hearing:

1. The reason why a public hearing before the full Air Pollution Control Board is requested:

Transparency of all our regulating agencies **should be, need to be**, the first priority for the citizenry of Virginia. Public concerns and opinions should be heard.

2. The concern of this compressor station are multifold:

Cumulative Impact

- If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants. What precautions or concerns are the DEQ taking or addressing to the amount of pollutants that will be emitted?

Health concerns

- The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization. What study's have the DEQ done to protect the residents of this community?

Environmental Justice

- Was there complete and accurate assessment of alternative sites that would not effect, again, communities of color and economic disparity as the situation in Buckingham County.

3. Specific References for Public Hearing

- Factoring in the emission levels of hazardous air pollutants generated by the two Transco compressor stations, the cumulative impact from those and the proposed Lambert facility would be more than 25 tons per year.
- There were several other hazardous air pollutants listed during the Environmental Impact Statement process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit.
- There are serious discrepancies between the information MVP's consultant provided in the EJ Analysis Report, and what MVP ultimately communicated in its final permit application. Given these disparities, it is unclear what the next steps of environmental justice review will be.
- Four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius.

Respectfully submitted by:

Bruce M. Coffey
10303 Russwood Road
Bent Mountain, VA 24059
540-354-7726
chefbruce2002@yahoo.com

Archived: Tuesday, March 2, 2021 8:58:58 AM
From: Richard Shingles
Sent: Monday, March 1, 2021 5:02:58 PM
To: anita.walthall@deq.virginia.gov
Subject: Fwd: Environmental Justice issues with Southgate Compressor station
Importance: Normal

Sorry, I forgot to include this required information:

Name: Richard D. Shingles
email address: shingles@vt.edu
Land address: 321 Dunford Ln, Newport, VA 24128
Phone number: 540-921-7324

----- Forwarded message -----

From: **Richard Shingles** <shingles@vt.edu>
Date: Mon, Mar 1, 2021 at 4:15 PM
Subject: Environmental Justice issues with Southgate Compressor station
To: <anita.walthall@deq.virginia.gov>

Virginia DEQ,

I have serious environmental justice concerns I wish to bring to your attention

President Biden promises to make tackling America's persistent racial and economic disparities a central part of his plan to combat climate change by prioritizing environmental justice. Under its current administration, Virginia has similar priorities.

The full MVP Southgate extension runs south from Chatham in Pittsylvania County, Virginia to Eden in Rockingham County, North Carolina, southeast through Alamance County, ending in the Burlington MSA. The North Carolina segment was halted, at least temporarily, in August 2020, by the denial of a state water quality permit. As planned, the extension would threaten multiple EJ communities, clearly in Pittsylvania County, already heavily overburdened by cumulative impacts of extraction industries (Land & Heritage Consulting, LLC, Sept. 2020), and very likely in other localities. Historically EJ communities have been sacrifice zones targeted for water, air and soil pollutants that privileged white communities avoid. The extension plans for a compressor Station in Pittsylvania County, near Chatham (26% minority) - with two gas-fueled combustion turbines, five microturbines and ancillary equipment - would produce health threatening air and noise pollution. Communities where air quality is poor suffer from higher levels of asthma and respiratory and heart diseases, leading to significantly higher death rates associated with coronavirus for African-, Latinx- and Native-Americans (Washington Post, 1/27/2021). Further south the pipeline is routed between Danville Virginia (53% minority) and Eden North Carolina (33% minority), through Reidsville (44% minority) to the Burlington (50% minority) where it threatens the Stony Creek Reservoir, the main drinking water supply. Chatham and the three of these North Carolina communities are reported to have high incidences of EJ characteristics associated with populations of color (EJ Piedmont Triad Regional Data Scan, Piedmont Triad Regional Council, 2016; Land & Heritage Consulting, LLC, Sept. 20 20).

Thank you.

Richard Shingles, Sierra Club, Virginia New River Valley Group Chair
email address: shingles@vt.edu
Land address: 321 Dunford Ln, Newport, VA 24128
Phone number: 540-921-7324

Archived: Tuesday, March 2, 2021 8:58:58 AM
From: Richard Shingles
Sent: Monday, March 1, 2021 4:15:33 PM
To: anita.walthall@deq.virginia.gov
Subject: Environmental Justice issues with Southgate Compressor station
Importance: Normal

Virginia DEQ,

I have serious environmental justice concerns I wish to bring to your attention

President Biden promises to make tackling America's persistent racial and economic disparities a central part of his plan to combat climate change by prioritizing environmental justice. Under its current administration, Virginia has similar priorities.

The full MVP Southgate extension runs south from Chatham in Pittsylvania County, Virginia to Eden in Rockingham County, North Carolina, southeast through Alamance County, ending in the Burlington MSA. The North Carolina segment was halted, at least temporarily, in August 2020, by the denial of a state water quality permit. As planned, the extension would threaten multiple EJ communities, clearly in Pittsylvania County, already heavily overburdened by cumulative impacts of extraction industries (Land & Heritage Consulting, LLC, Sept. 2020), and very likely in other localities. Historically EJ communities have been sacrifice zones targeted for water, air and soil pollutants that privileged white communities avoid. The extension plans for a compressor Station in Pittsylvania County, near Chatham (26% minority) - with two gas-fueled combustion turbines, five microturbines and ancillary equipment - would produce health threatening air and noise pollution. Communities where air quality is poor suffer from higher levels of asthma and respiratory and heart diseases, leading to significantly higher death rates associated with coronavirus for African-, Latinx- and Native-Americans (Washington Post, 1/27/2021). Further south the pipeline is routed between Danville Virginia (53% minority) and Eden North Carolina (33% minority), through Reidsville (44% minority) to the Burlington (50% minority) where it threatens the Stony Creek Reservoir, the main drinking water supply. Chatham and the three of these North Carolina communities are reported to have high incidences of EJ characteristics associated with populations of color (EJ Piedmont Triad Regional Data Scan, Piedmont Triad Regional Council, 2016; Land & Heritage Consulting, LLC, Sept. 20 20).

Thank you.

Richard Shingles, Sierra Club, Virginia New River Valley Group Chair

Archived: Tuesday, March 2, 2021 8:58:58 AM
From: [Les Reynolds](#)
Sent: Monday, March 1, 2021 12:10:51 PM
To: anita.walthall@deq.virginia.gov
Subject: MVP Compressor Station, Pittsylvania County
Importance: Normal

Ms. Walthall:

I have recently learned about the proposed compressor station and I share the concerns of many that the potential negative environmental impacts of this project are not minor and should not be categorized as such.

I request that all aspects of this proposed project be publically discussed and reviewed to fully determine the benefits and detrimental effects on the environment and that the permit be presented to the State Air Pollution Control Board for their review.

Once this project is completed and operational, it will be too late to intelligently make those important decisions.

Thank you for your time and consideration.

Les Reynolds
1502 White Oak Court
Martinsville, VA 24112
Cell (276) 806-4074
lesreynolds61153@comcast.net

Archived: Tuesday, March 2, 2021 8:58:59 AM
From: He, Yongtian
Sent: Monday, March 1, 2021 2:20:26 PM
To: anita.walthall@deq.virginia.gov
Subject: Question on MVP Lambert Compressor Station mNSR permit
Importance: Normal

Hi, Anita,

I have a question about the mNSR permit. on page 26 of the final draft analysis document, Attachment showing NAAQS modeling results (as in below Table 2). The Transco Compressor Station 165 appears to be very close to the proposed Lambert Compressor Station (within hundreds of feet), however, the model results show the contribution to NO₂ 1 hour concentrations differ by two orders of magnitude. Do you know the reason of what could cause the difference? I am concerned that if the contribution of Lambert Compressor Station is anything close to the contribution of Tansco Compressor Station 165, it could exceed the NAAQS 1 hour NO_x concentration standard (188 ug/m³).

Table 2
Source Contribution Analysis - Maximum 1-Hour NO₂ Concentration

Contributing Source	Concentration (µg/m ³)
Transco Compressor Station 165	116.85
Lambert Compressor Station	1.04
Other Modeling Inventory Sources	0.04
Background Air Quality	60.86
Total Concentration	178.8

Yongtian He (Tom), PhD
U.S EPA - Region III
Air & Radiation Division
Permits Branch
1650 Arch Street (3AD10)(14-325)
Philadelphia, PA 19103
(Tel) 215-814-2339
(Email) He.Yongtian@epa.gov

image002.jpg

Table 2

Source Contribution Analysis - Maximum 1-Hour NO₂ Concentration

Contributing Source	Concentration ($\mu\text{g}/\text{m}^3$)
Transco Compressor Station 165	116.85
Lambert Compressor Station	1.04
Other Modeling Inventory Sources	0.04
Background Air Quality	60.86
Total Concentration	178.8

Archived: Wednesday, March 3, 2021 9:54:16 AM

From: John Surr

Sent: Tuesday, March 2, 2021 9:18:02 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Please reject Mountain Valley Pipeline's Lambert Compressor Station application, for the following reasons:

Lack of information regarding Hazardous Air Pollutants (HAPs)

- The only hazardous air pollutant that is subject to hourly and yearly emission limits in the draft permit is formaldehyde.
- There were several other hazardous air pollutants listed during the Environmental Impact Statement process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit.
- Factoring in the emission levels of hazardous air pollutants generated by the two Transco compressor stations, the cumulative impact from those and the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby community over the limit in terms of risk of adverse health effects.

Health concerns

- Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema.
- MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.
- The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%.
- The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization.
- Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia.
- In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

Environmental Justice concerns

- The permit's EJ Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated.
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- Four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius.
- There are serious and significant discrepancies between the information provided in the EJ Analysis Report conducted for MVP, and what MVP ultimately communicated in their final version of the permit application.

Noise pollution concerns

- MVP has applied to have weekly startups and shutdowns for both the station's turbines, which would result in 208 events per year. Each event would create spikes in air pollution emissions, as well as significant noise impacts.

- It is unclear how MVP plans to coordinate with the two existing Transco compressor stations in order to stagger these events so as to reduce the amount of air and noise pollution and harm on nearby communities.

Cumulative Impact Concerns

- DEQ should take cumulative impacts and existing levels of air pollution into consideration when evaluating the suitability of the proposed location for the Lambert Compressor Station.
- If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants.

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SOx		19.1	13.9	5.2

Procedural concerns

- Owing to the current Covid health crisis, DEQ's notification processes are increasingly reliant on electronic outreach. This is inappropriate as many of the impacted localities do not have consistent internet access. Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.
- During the public information session on Jan 7, 2021 regarding the timeline for approval, members of the public flagged that the timeline seems set by the applicant. As the project is missing a major state level permit (a Clean Water Act 401 water certification from North Carolina), DEQ staff acknowledged that they possibly should NOT be moving forward.
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- Among other legal challenges, the MVP mainline is currently unable to cross many miles of water bodies and MVP has announced to Va. DEQ that they will file for an individual permit which would add substantial delay.

John Surr

John Surr
jvsurr@gmail.com
 250 Pantops Mtn. Rd., Apt. 7504
 Charlottesville, VA 22911-8720
 phone (434) 972-2854

Archived: Wednesday, March 3, 2021 9:54:17 AM

From: Jenkins, Paul R

Sent: Tuesday, March 2, 2021 8:16:37 AM

To: Walthall, Anita

Subject: Fwd: Air Modeling Questions

Importance: Normal

Attachments:

[Radiation McArthur Mandatory Air Monitoring of TENORM Worker Inhalation Exposure from Gas TENORM, by Alan McArthur.key](#) 

Please add this to the comments for MVP.

This is his information:

William F. Limpert
4102B Garfield Road
Smithsburg, MD 21783
301-416-0571

----- Forwarded message -----

From: **William Limpert** <wflimpert@gmail.com>

Date: Mon, Mar 1, 2021 at 3:20 PM

Subject: Air Modeling Questions

To: <paul.jenkins@deq.virginia.gov>

Paul:

Thanks for talking with me earlier today.

I would like clarification of the air dispersion modeling for the proposed Lambert compressor station. Can you please ask your central modeling group to review this information and answer the following questions?

Methane makes up about 94% of the natural gas stream. The other 6% of the components are virtually all toxic, are heavier than air, and much heavier than methane. I am concerned that they will drop out of the discharge plume near the compressor station, polluting that area, damaging the health of residents, and they may accumulate over time.

Does the air modeling take into account the different molecular weights of the plume constituents from both combustion emissions, and station leak emissions?

If leak emissions are modeled, are they shown as being discharged close to the ground from the building, and not out of the top of the stack?

Are leak emissions modeled at varying leak rates?

Does air modeling take into account differing weather conditions, and in particular air inversions? A 2016 study by Nathan et al showed higher than expected methane levels on the ground downwind of compressor stations during air inversion events.

Does air modeling cover all of the toxic substances in the discharge plume, including Radon-222, or just the regulated HAPs?

One other question for you...The decay of radioactive radon-222 in the gas stream creates radioactive scales comprised of radioactive lead-210, radioactive polonium-210 along the interior of the pipes. Radioactive bismuth-210 is created as well, but I don't know if it forms scales. This is well known to the industry and researchers. I think these substances may also be discharged as particulate matter through leaks and station exhausts. Please take a quick look at the attached report, NORM IX, by McArthur and Lemons. In particular, look at the photo showing loose radioactive particulate matter in the bottom of a pipe that has not been captured by filters.

I think DEQ should be evaluating the environmental and health impacts of these radioactive materials, possibly with the help of VDH, or the Radiation Advisory Board, prior to issuing an air discharge permit for the Lambert compressor station.

Thanks again for your help, and your public service.

Bill

--

Paul R. Jenkins

Regional Air Permit Manager
Virginia Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
540-562-6822

paul.jenkins@deq.virginia.gov

www.deq.virginia.gov

Archived: Wednesday, March 3, 2021 9:54:19 AM
From: [Michael Bentley](#)
Sent: Tuesday, March 2, 2021 12:21:11 PM
To: anita.walthall@deq.virginia.gov
Subject: Lambert Compressor Station in Pittsylvania County
Importance: Normal

Dear Ms. Walthall:

I'm writing to ask you to have the full Air Pollution Control Board review this proposed MVP compressor station. Residents in Southside Virginia are facing a major increase in air pollution, principally from formaldehyde emissions from the proposed fracked-gas facility that would pump such toxins into the air and endanger health and the environment: the Lambert Compressor Station in Pittsylvania County, part of the Mountain Valley Pipeline's Southgate extension in North Carolina. It would be adjacent to two existing compressor stations and impact local community members.

In your review of the air permit for the compressor station, please include my comment. I hope that the DEQ and the Air Pollution Control Board will agree that this facility is too harmful of air quality to go forward.

Sincerely,

(Dr.) Michael Bentley
312 N Broad St, Salem, VA 24153

Archived: Thursday, March 4, 2021 4:54:38 PM

From: Kelsey Condon

Sent: Wednesday, March 3, 2021 11:27:53 AM

To: anita.walthall@deq.virginia.gov

Subject: Public Comment: MVP Compressor Station-Pittsylvania County, VA Draft Air Permit

Importance: Normal

Public Comment regarding the proposed MVP Compressor Station submitted by:

Kelsey Condon
2105 N Taft St. #3
Arlington, VA 22201
(239) 777-4327

The only hazardous air pollutant that is subject to hourly and yearly emission limits in the draft permit is formaldehyde. There were several other hazardous air pollutants listed during the Environmental Impact Statement process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit. Factoring in the emission levels of hazardous air pollutants generated by the two Transco compressor stations, the cumulative impact from those and the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby community over the limit in terms of risk of adverse health effects.

The permit's Environmental Justice Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated. There are serious discrepancies between the information MVP's consultant provided in the EJ Analysis Report, and what MVP ultimately communicated in its final permit application. Four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius. There are serious and significant discrepancies between the information provided in the EJ Analysis Report conducted for MVP, and what MVP ultimately communicated in their final version of the permit application.

Additionally, owing to the current Covid health crisis, DEQ's notification processes are increasingly reliant on electronic outreach. This is inappropriate as many of the impacted localities do not have consistent internet access. Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.

This permit should be elevated to the Air Pollution Control Board and DEQ must learn and disclose to the public through a public hearing more about the proposed Station and its potential health and environmental impacts on this already overburdened community.

Archived: Friday, March 5, 2021 7:20:48 AM

From: [Phil Mauger](#)

Sent: Thursday, March 4, 2021 12:20:05 PM

To: Anita.Walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline (MVP Southgate)-Lambert Compressor Station Public Hearing

Importance: Normal

March 4, 2021

Philip S Mauger
25 Lanier Avenue
Chatham, VA 24531
(434) 770-1132

To whom it may concern:

As an almost 20 year resident of the Town of Chatham, I fully support MVP Southgate's request for an air permit for its compressor station in Pittsylvania County. I understand it is more than a half mile from the nearest home, and it's proposed in an industrial area.

On completion, I feel it will have a positive economic impact throughout the region by paying more taxes to the county government and providing our region with greater access to a more affordable, cleaner fuel that homes and businesses need.

Thank you for your consideration of this matter.

Phil Mauger

--

Phil Mauger
Outstaffing, Inc.
Phone: 1-888-OUTSTAFF (1-888-688-7823)
Fax: 1-877-OUTSTAFF (1-877-688-7823)
Email: Phil@Outstaffing.com

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Archived: Friday, March 5, 2021 7:20:48 AM

From: [Margaret Sims](#)

Sent: Thursday, March 4, 2021 7:19:32 PM

To: anita.walthall@deq.virginia.gov

Subject: Fw: Lambert Compressor Station

Importance: Normal

From: Margaret Sims

Sent: Thursday, March 4, 2021 7:13 PM

To: anita.walthall@deq <anita.walthall@deq>

Subject: Lambert Compressor Station

I am concerned about the environmental impact of the Lambert Compressor Station on the people living near it. Please allow a full hearing in front of the Virginia Air Pollution Control Board before making any decisions on this Compressor Station.

Sincerely,

Margaret Sims

14010 Briars Circle #403

Midlothian, Va. 23114

804 379-5795

Archived: Friday, March 5, 2021 7:20:48 AM

From: [Mark E. Barker](#)

Sent: Thursday, March 4, 2021 1:52:17 PM

To: anita.walthall@deq.virginia.gov

Subject: Comments regarding Draft Air Permit 21652 MVP Lambert Compressor Station

Importance: Normal

Attachments:

[20210304_BREDL_comments_LCS_Air_Permit.pdf](#);

Hi Ms. Walthall,

Please find attached BREDL's comments on the Draft Air Permit for the MVP Lambert Compressor Station, Permit 21652.

Thanks!

Mark

Mark E. Barker
Executive Assistant
BREDL
1828 Brandon Ave. SW
Roanoke, VA 24015
540-342-5580 (home/office)
540-525-5241 (cell)
mebarker@cox.net
mbarker@bredl.org
www.bredl.org

20210304_BREDL_comments_LCS_Air_Permit.pdf

Blue Ridge Environmental Defense League

www.BREDL.org 1828 Brandon Ave. SW Roanoke, VA 24015 mebarker@cox.net (540) 342-5580

March 4, 2021

Anita Walthall
VA DEQ
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
Phone: 540-562-6769
Email: anita.walthall@deq.virginia.gov

delivered via email

Comments regarding Air Permit Registration Number 21652, Mountain Valley Pipeline LLC, Lambert Compressor Station; 987 Transco Rd Chatham, VA 24531

Dear Ms. Walthall:

I am submitting comments on behalf of the Blue Ridge Environmental Defense League (BREDL) and our members in Virginia. BREDL is a regional, community-based, non-profit environmental organization. BREDL has chapters throughout the Southeast, including three in communities traversed by the Mountain Valley Pipeline and MVP-Southgate projects.

While we appreciate VA DEQ ensuring that this facility will include additional pollution controls and measures, we respectfully request that this air permit be denied.

VA DEQ is treating this as a stand-alone project when it is dependent on both MVP mainline and MVP Southgate extension being completed. Granting of this permit would be premature considering the outstanding major issues with both the MVP mainline and the MVP Southgate extension. MVP mainline has yet to secure the necessary permit for stream crossings and there are several court cases that have not been ruled upon (See Attachment 1). The MVP Southgate project lacks the Clean Water Act 401 water quality certification from North Carolina. That request was denied in August 2020.¹ The air permitting process for the Lambert Compressor Station should be put on hold until MVP and MVP Southgate can secure ALL the necessary permits and approvals.

This project has significant public interest. **Prior to the conclusion of the public comment period, BREDL will submit an additional letter to VA DEQ requesting that this permit be reviewed by the Virginia Air Pollution Control Board.**

¹ Denial of 401 Water Quality Certification and Jordan Lake Riparian Buffer Authorization Application, DWR # 20181638 v3, NC DEQ letter, S. Daniel Smith, Director, Division of Water Resources, August 11, 2020

Background

On April 11, 2018, MVP announced the MVP Southgate project – an extension of the MVP mainline project. As part of the Southgate project, MVP proposed constructing a natural gas compressor station near Chatham, VA.

MVP submitted their first air permit application to VA DEQ on Nov. 8, 2018. After some back and forth with VA DEQ, MVP submitted a revised application on April 25, 2019. MVP released a second revision on June 30, 2020 which included additional pollution controls. The draft air permit is based on the June 30, 2020 revised application.

Draft Air Permit Registration Number 21652

(Stationary Source Permit to Construct and Operate - New Source Performance Standards)

We applaud the additional pollution controls required for this facility which has resulted in the significant reduction in some toxic emissions. Selective Catalytic Reduction for NO_x control on the two turbines and Dry Low NO_x Combustor Technology for the microturbines will significantly reduce NO_x emissions. Including controls such as limiting startup and shutdowns, utilizing pressurized holds, block valves, and a Vent Gas Reduction System will help reduce VOC and methane emissions. We appreciate VA DEQ's efforts on this.

NO_x emissions were reduced by 64%, CO emissions reduced by 70%, VOCs reduced by 60% and HAPs reduced by 76% from the April 25, 2019 revised application to the June 30, 2020 revised application. However, we do point out that other pollutants SO₂, PM 2.5 and Greenhouse Gases all increased slightly with the June 30, 2020 revised application.

We also acknowledge MVP's correction in their air modeling for the June 30, 2020 revised application. The revised air modeling corrected the lack of receptors on the adjacent Transco property and also corrected the centering of the LCS facility in the air modeling mapping, thus adhering to EPA decades-long protocol for air modeling.

Specific comments

Will the monitoring plan, which will include parameter ranges, as established in **Condition 13** be made public?

Regarding **Condition 19**, each microturbine has an emission limit of 0.02 lb/hr for VOCs which would amount to 175 lbs/year ($8760 \times 0.02 = 175.2$). When multiplied by the five microturbines the total amount could reach 876 lbs/year which is more than the Solar Mars 100 turbine listed in Condition 20. There needs to be an annual emissions limit for VOCs for the microturbines.

Regarding **Condition 20**, the annual emissions limit for carbon monoxide is essentially 58% more than allowed by the hourly emissions limit ($8760 \times 0.60 = 5,256$ lbs). The emissions limit of 6.30 tpy (12,600 lbs) needs to be significantly less than listed in the draft permit. It needs to be closer to 2.63 tpy (5,256 lbs) to be a meaningful limit.

The annual emissions limit for VOCs is essentially 37% more than allowed by the hourly emissions limit ($8760 \times 0.09 = 788.4$ lbs). The emissions limit of 0.63 tpy (1,260 lbs) needs to be less than listed in the draft permit. It needs to be closer to 0.39 tpy (788.4 lbs) to be a meaningful limit.

Regarding **Condition 21**, the annual emissions limit for carbon monoxide is essentially 69% more than allowed by the hourly emissions limit ($8760 \times 0.41 = 3,591.6$ lbs). The emissions limit of 5.93 tpy (11,860 lbs) needs to be significantly less than listed in the draft permit. It needs to be closer to 1.80 tpy (3,591.6 lbs) to be a meaningful limit.

The annual emissions limit for VOCs is essentially 72% more than allowed by the hourly emissions limit ($8760 \times 0.06 = 525.6$ lbs). The emissions limit of 0.94 tpy (1,880 lbs) needs to be significantly less than listed in the draft permit. It needs to be closer to 0.26 tpy (525.6 lbs) to be a meaningful limit.

We should mention that in Conditions 19, 20, 21 other pollutants (NO_x, PM, SO₂) are within 0.5 to 5% of each other when comparing hourly and annual emissions. As pointed out above, the CO and VOC comparisons for hourly and annual emissions aren't close.

Health Impacts

*DEQ's Mission is to protect and enhance Virginia's environment, and promote the health and well-being of all citizens in the Commonwealth. DEQ's Vision is that all Virginians enjoy cleaner water, better air quality and the productive reuse of land that was once contaminated.*²

DEQ must consider the health impacts of proposed facilities if the agency is to fulfill its mission to "promote the health and well-being of all citizens." DEQ needs to consider additional emissions and how they might impact the health of residents who have been exposed for decades to toxins from nearby compressor stations – Transco Station 165 dates back to the late 1950s. The primary pollutants from the Lambert Compressor Station which pose a health risk to community residents are discussed below.

NO_x

About NO_x

Nitrogen oxides (NO_x) is used to refer to nitric oxide (NO) and nitrogen dioxide (NO₂). The EPA NAAQS health standard is for NO₂. Nitrogen oxides are produced from the reaction of nitrogen and oxygen during combustion, especially at high temperatures. EPA states that NO₂ is used as the indicator for the larger group of nitrogen oxides. In 2010, EPA strengthened the NAAQS health standard for NO₂ by adding a 1-hour standard. EPA retained the annual average standard.

- ❖ NO_x are emitted from vehicle exhaust and the burning of fossil-fuels especially from electric power plants.
- ❖ NO_x react with sunlight and other chemicals to form smog and VOCs to form ozone.

² <https://www.deq.virginia.gov/get-involved/about-deq>

- ❖ NO_x and sulfur dioxide react with substances in the air to form acid rain.

Health Impacts from NO_x

Inflammation of the airways

Worsened cough and wheezing

Increase in asthma attacks

Increase in heart attack risk

Long term exposure:

Increases the risk of respiratory conditions

Can decrease lung function

Increases the response to allergens

Long-term exposure to traffic-related nitrogen dioxide (NO₂) and nitrogen oxides (NO_x) may contribute to the development of COPD with possibly enhanced susceptibility in people with diabetes and asthma.

CO

About CO

Carbon monoxide (CO) is a colorless, nonirritating, odorless, and tasteless gas. It is found in both outdoor and indoor air. Carbon monoxide is made when carbon in fuel is not burned completely. The most important human-made source of carbon monoxide arises from the exhaust of automobiles.

Health Impacts from CO³

Breathing high levels of carbon monoxide can kill you.

Breathing lower levels of carbon monoxide can permanently harm your heart and brain.

Carbon monoxide can be more harmful to you if you have heart or lung disease.

Breathing high levels of carbon monoxide can lead to miscarriage.

Breathing lower levels of carbon monoxide during pregnancy may harm the mental development of your child.

PM 2.5

About PM 2.5

Particulate Matter is the term for particles found in the air, including dust, dirt, soot, smoke, and liquid droplets.

- ❖ Particulates contribute to haze.
- ❖ Sources of fine particles include all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and industrial processes.

Health Impacts from PM 2.5

Increased hospital admissions

Aggravated asthma Increases in respiratory symptoms (coughing, difficult/painful breathing)

Chronic bronchitis

Decreased lung function

³ <https://www.atsdr.cdc.gov/phs/phs.asp?id=1146&tid=253>

Premature death

Increases dementia risk

Risks for heart attacks, heart disease, strokes Increases premature births

Lung cancer rose by 18% for every increase of 5 ug/m3.

Causes about 200,000 early deaths each year.

Reducing particulates has added 5 months to urban life expectancy.

VOCs

About VOCs

Volatile organic compounds (VOCs) are emitted by automobiles and various commercial and industrial sources. VOC is a component of ozone.

Health Impacts from VOCs

Short-term exposure to VOCs may cause:

Irritation of the eyes and respiratory tract

Headaches

Dizziness

Visual disorders

Memory problems

Long-term exposure to VOCs may cause:

Irritation of the eyes, nose, and throat

Nausea

Fatigue

Cancer

Loss of coordination

Damage to the liver and kidneys

Damage to the central nervous system

SO₂

About SO₂

Sulfur dioxide is a colorless gas with a pungent odor. Sulfur dioxide in the air results primarily from activities associated with the burning of fossil fuels (coal, oil) such as at power plants or from copper smelting. NO_x and sulfur dioxide react with substances in the air to form acid rain.

Health Impacts from SO₂

Short-term exposures to high levels of sulfur dioxide can be life-threatening. Exposure to 100 parts of sulfur dioxide per million parts of air (ppm) is considered immediately dangerous to life and health. Burning of the nose and throat, breathing difficulties, and severe airway obstructions are some impacts. Long-term exposure to persistent levels of sulfur dioxide can also affect your health Lung function. Exercising asthmatics are sensitive to the respiratory effects of low concentrations (0.25 ppm) of sulfur dioxide.

Formaldehyde

About Formaldehyde

Formaldehyde is a colorless, flammable gas at room temperature. It has a pungent, distinct odor and may cause a burning sensation to the eyes, nose, and lungs at high concentrations. The breakdown products of formaldehyde in air include formic acid and carbon monoxide.

Health Impacts from Formaldehyde⁴

The most common health symptoms include irritation of the eyes, nose, and throat, along with increased tearing, which occurs at air concentrations of about 0.4–3 parts per million (ppm). National Institute for Occupational Safety and Health (NIOSH) states that formaldehyde is immediately dangerous to life and health at 20 ppm. One large study of people with asthma found that they may be more sensitive to the effects of inhaled formaldehyde than other people.

Climate Change

On April 11, 2020 Governor Ralph Northam signed the Virginia Clean Economy Act, which requires new measures to promote energy efficiency. At the time, Governor Northam was quoted in the media as saying, “These new clean energy laws propel Virginia to leadership among the states in fighting climate change. They advance environmental justice and help create clean energy jobs. In Virginia, we are proving that a clean environment and a strong economy go hand-in-hand.”⁵

The Virginia Clean Economy Act is supposed to put Virginia on a path to 100% clean energy by 2045 as part of Virginia’s effort to reduce its impact on climate change. U.S. Energy Information Administration data in 2019 stated that 60% of Virginia’s electricity came from natural gas, 30% from nuclear, 4% from coal and 7% from renewables. Continuing to approve and permit fossil fuel emission sources is not going to help us reach the 2045 goal.

Greenhouse Gases

About GHG

Greenhouse Gases (GHG) emitted from the proposed LCS will include Carbon dioxide (CO₂), Methane (CH₄) and Nitrous oxide (N₂O).

Carbon dioxide (CO₂): Carbon dioxide enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and other biological materials, and also as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or “sequestered”) when it is absorbed by plants as part of the biological carbon cycle.

Methane (CH₄): Methane is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills.

⁴ <https://www.atsdr.cdc.gov/ToxProfiles/tp111-c1-b.pdf>

⁵ <https://www.nbc12.com/2020/04/12/governor-northam-signs-virginia-clean-economy-act/>

Nitrous oxide (N₂O): Nitrous oxide is emitted during agricultural and industrial activities, combustion of fossil fuels and solid waste, as well as during treatment of wastewater.

Health Impacts from Climate Change

“Climate change will affect air quality through several pathways including production and allergenicity of aeroallergens such as pollen and mold spores and increases in regional ambient concentrations of ozone, fine particles, and dust. Some of these pollutants can directly cause respiratory disease or exacerbate respiratory disease in susceptible individuals.”⁶

“Climate change represents a massive threat to respiratory health: 1) by directly promoting or aggravating respiratory diseases; or 2) by increasing exposure to risk factors for respiratory diseases. Climate change increases the amount of pollen and allergen produced by each plant, [mold] proliferation and the concentrations of outdoor ozone and particulate matter at ground level. The main diseases of concern are asthma, rhinosinusitis, chronic obstructive pulmonary disease (COPD) and respiratory tract infections. Groups at higher risk of climate change effects include individuals with pre-existing cardiopulmonary diseases or disadvantaged individuals.”⁷

“Climate change, coupled with air pollutant exposures, may have potentially serious adverse consequences for human health. Rising temperatures will contribute to the elevation of the concentrations of ozone (due to more sunlight and higher temperature) and particulate matter (due to wildfire, droughts, desertification, sandstorms and an increased use of coal-fired power to produce energy for cooling) at ground level. Some air pollution-related episodes of rhinitis and asthma exacerbation are due to climatic factors that [favor] the accumulation of air pollutants, such as ozone, at ground level and some cities are continuously affected by air pollution caused by motor vehicles, including particulate matter and nitrous oxides”⁸

Environmental Justice

Virginia Laws

The Virginia Environmental Justice Act was passed into law in 2020. The Act states, “It is the policy of the Commonwealth to promote environmental justice and ensure that it is carried out throughout the Commonwealth, with a focus on environmental justice communities and fenceline communities”. VAC § 2.2-235.

"Environmental justice" means the fair treatment and meaningful involvement of every person, regardless of race, color, national origin, income, faith, or disability, regarding the development, implementation, or enforcement of any environmental law, regulation, or policy.⁹

⁶ Ibid.

⁷ <https://err.ersjournals.com/content/23/132/161> Climate change and respiratory diseases, European Respiratory Review, Gennaro D’Amato, Lorenzo Cecchi, Mariella D’Amato, Isabella Annesi-Maesano European Respiratory Review 2014 23: 161-169; DOI: 10.1183/09059180.00001714

⁸ Ibid.

⁹ VAC § 2.2-234

"Environmental justice community" means any low-income community or community of color.¹⁰

"Fenceline community" means an area that contains all or part of a low-income community or community of color and that presents an increased health risk to its residents due to its proximity to a major source of pollution.¹¹

"Fair treatment" means the equitable consideration of all people whereby no group of people bears a disproportionate share of any negative environmental consequence resulting from an industrial, governmental, or commercial operation, program, or policy.¹²

"Meaningful involvement" means the requirements that (i) affected and vulnerable community residents have access and opportunities to participate in the full cycle of the decision-making process about a proposed activity that will affect their environment or health and (ii) decision makers will seek out and consider such participation, allowing the views and perspectives of community residents to shape and influence the decision.¹³

Virginia law governing energy development articulates support for environmental justice and equitable development. One of the stated objectives in Commonwealth Energy Policy is "developing energy resources and facilities in a manner that does not impose a disproportionate adverse impact on economically disadvantaged or minority communities." VAC § 67-101 (12). Further, it states that "To achieve the objectives enumerated in § 67-101, it shall be the policy of the Commonwealth to [e]nsure that development of new, or expansion of existing, energy resources or facilities does not have a disproportionate adverse impact on economically disadvantaged or minority communities." VAC § 67-102 (A)(11).

Public Participation

We express our concern that online public meetings and hearings do not offer an opportunity for some impacted/affected citizens – especially those in Environmental Justice communities. These online meetings deprive those without high speed internet the opportunity to learn about this proposal and to provide input on a project that may have economical and health impacts to them.

One broadband data source states that 90.4% of Virginians have access to broadband that is 100mbps or faster. However, 62.03% of residents in the Chatham, VA zipcode have no broadband access. Only 58.3% of Pittsylvania residents have broadband access.¹⁴

Community Burden of 3 compressor stations

If the Lambert compressor station is permitted, there will be 3 operational compressor stations located side by side by side in the Chatham, VA area. This places an unfair burden on this community. Increased toxins to breathe, increased noise to hear and increased vibrations to endure.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ <https://broadbandnow.com/Virginia>

MVP EJ Report

We point out the absurdity of the MVP consultant's report on Environmental Justice. The report by Land & Heritage Consulting, LLC stated,

*We have identified multiple communities throughout Pittsylvania County who meet the criteria for designation as Environmental Justice communities, and whose members report or anticipate perceived potential negative impacts as a result of the proposed Project. We have further identified multiple Indigenous communities, connected in a single cultural-linguistic diaspora (the Yesàh), whose ancestral and current homelands are impacted by the pipeline portion of the Project. These Indigenous communities not only meet the criteria for designation as environmental justice communities, but further possess a unique relationship to the land, and require additional, intentional, and thoughtful engagement and distributive compensation as a result of that unique relationship.*¹⁵

Obviously, what is missing is where industry and agency not only acknowledge the communities will be adversely impacted but they also prevent those impacts from happening in the first place. Quite frankly, some of the MVP recommendations are insulting.

*MVP Recommendation: Specific outreach to and consultation with African-American communities, who have been disproportionately affected by past exploitative energy and manufacturing projects, and who have historically been at the forefront of efforts pushing for greater environmental justice & fairer outcomes for all people*¹⁶

The answer is not to shove another exploitative energy project down people's throats.

*MVP Recommendation: Coordination with local health services to ensure health care is made available to communities suffering potential health impacts, as well as to communities with pre-existing vulnerabilities.*¹⁷

This recommendation is remarkably brazen. Sorry our pollution is killing you. Here's a doctor's appointment. Gee, Thanks!

*MVP Recommendation: Ongoing consultation with communities and community researchers to identify any emergent points of concern and address them quickly, and with a distributive justice framework in mind.*¹⁸

The concern is your proposal to place yet another toxic facility in the community.

¹⁵ Land & Heritage Consulting, LLC; Community Impact Assessment of Lambert Compressor Station; September 2020, p. 52

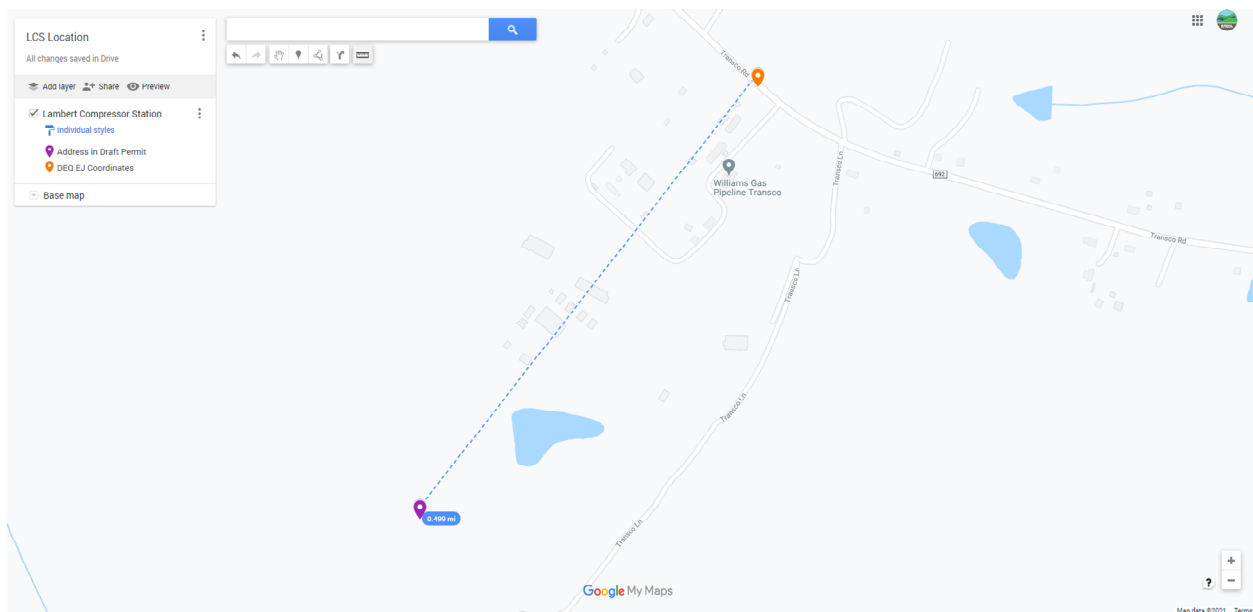
¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

VA DEQ EJScreen Report

We point out a discrepancy in plotting the location on the EJScreen tool. In the DEQ Intra-agency memo – Engineering Analysis file: 21652_01_20_Final_Draft_Analysis.docx the Appendix included the EJScreen reports for 1, 2 and 5 mile radii (See Attachment 2). VA DEQ plotted the location of the LCS facility at the entrance of the Transco complex (orange icon on map below). BREDL used the address provided in the draft air permit - 987 Transco Road in Chatham, Virginia 24531 (purple icon on the map below) and completed EJScreen reports (See Attachment 2). There is a ½ mile difference in locations which does slightly affect the EJScreen results. We also point out that the purple icon below (BREDL's EJScreen run) is very near the gas turbine emission sources as plotted in the AERMOD air modeling – see second map below (Yellow pins indicate emission sources, purple pin indicates LAT/LON coordinates from EJScreen using draft permit address).





This error may seem slight but a half of a mile is a long distance when you are mapping 1, 2 and 5-mile radii. The differences in EJScreen Reports are more evident in the 5-mile reports. The VA DEQ EJScreen report indicates a minority population of 30%, a low-income population of 35% and an over the age of 64 population of 21%. The BREDL EJScreen report indicates a minority population of 33%, a low-income population of 36% and an over the age of 64 population of 19%.

Lastly, we should point out that EJScreen is just one tool that should be used to access EJ communities. It is not designed to be the definitive source on determining environmental justice. EPA makes it very clear that EJScreen is just an initial tool when looking at environmental justice and that impacted communities will need further review, analysis, and “local knowledge” to get a better understanding.

As duly noted on the U.S. EPA environmental justice website,¹⁹ “anyone using EJSCREEN should note there is substantial uncertainty in demographic and environmental data, particularly when looking at small geographic areas. EJSCREEN is not intended to provide a risk assessment. Also EJSCREEN does not provide data on every environmental impact and demographic indicator that may be relevant to a particular location, and data may be several years old. Screening results should be supplemented with additional information and local knowledge to get a better understanding of the issues in a selected location. It is important to understand the caveats and limitations when using EJSCREEN.”

Common Control Source Determination

Combining emissions from the three compressor stations (LCS and Transco Stations 165 & 166) would require a Title V Air permit, a higher level of permitting. Therefore, we respectfully request VA DEQ to confer with the new EPA Administration regarding the latest policy on “common control” or source determination regarding the Lambert Compressor Station adjacent to the Transco compressor stations’ complex. VA DEQ needs to fully explain the applicability of the LCS facility in regards to common control.

29 CFR § 779.221 “Common control” defined.

Under the definition the “enterprise” includes all related activities performed through “common control” for a common business purpose. The word “control” may be defined as the act of fact of controlling; power or authority to control; directing or restraining domination. “Control” thus includes the power or authority to control. In relation to the performance of the described activities, the “control,” referred to in the definition in section 3(r) includes the power to direct, restrict, regulate, govern, or administer the performance of the activities. “Common” control includes the sharing of control and it is not limited to sole control or complete control by one person or corporation. “Common” control therefore exists where the performance of the described activities are controlled by one person or by a number of persons, corporations, or other organizational units acting together. This is clearly supported by the definition which specifically includes in the “enterprise” all such activities whether performed by “one or more corporate or other organizational units.” The meaning of “common control” is discussed comprehensively in part 776 of this chapter.²⁰

¹⁹ <https://www.epa.gov/environmentaljustice>

²⁰ <https://www.law.cornell.edu/cfr/text/29/779.221>; Electronic Code of Federal Regulations (e-CFR) Title 29. Labor Subtitle B. Regulations Relating to Labor Chapter V. WAGE AND HOUR DIVISION, DEPARTMENT OF LABOR Subchapter B. STATEMENTS OF GENERAL POLICY OR INTERPRETATION NOT DIRECTLY RELATED TO REGULATIONS Part 779. THE FAIR LABOR STANDARDS ACT AS APPLIED TO RETAILERS OF GOODS OR SERVICES Subpart C.

In an early action implementing the Nonattainment NSR program, EPA explained that it would be guided by a definition of control established by the Securities and Exchange Commission (SEC), which states the following: “the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person (or organization or association) whether through the ownership of voting shares, contract, or otherwise.” 45 Fed. Reg. at 59878 (*quoting* 17 C.F.R. § 210.1-02(g)). In a 1996 memorandum concerning source determinations on Federal military installations, EPA further explained:

In general, the controlling entity is the highest authority that exercises restraining or directing influence over a source’s economic or other relevant, pollutant-emitting activities. In considering interactions among facilities, what must be determined is who has the power of authority to guide, manage, or regulate the pollutant-emitting activities of those facilities, including “the power to make or veto decisions to implement major emission-control measures” or to influence production levels or compliance with environmental regulations.”²¹

MVP Southgate is tied to Transco

In the Mountain Valley Pipeline – Southgate Project application to Federal Energy Regulatory Commission, the company states:

“In choosing Mountain Valley and the Southgate Project to provide its needed incremental pipeline capacity as part of a competitive solicitation process, PSNC Energy cited numerous reasons, including transportation cost, supply cost, supply diversity, reliability/resiliency, and operational efficiencies: ...

The Project will provide a direct connection between PSNC Energy’s local distribution system and the East Tennessee pipeline system. PSNC Energy currently sources gas from Spectra Energy Partner’s Saltville Storage facility and transports these volumes on the East Tennessee and Transcontinental Gas Pipe Line, LLC (“Transco”) systems before delivery to PSNC Energy’s local distribution system. The Project provides a primary receipt and delivery forward haul transportation path that offers improved reliability as compared to the secondary-firm backhaul deliveries PSNC Energy currently receives from Transco.”²²

A report included with the application went on to mention, “as designed, the proposed Mountain Valley Pipeline project will traverse from its origin at receipt points in Wetzel County, West Virginia, to a terminus interconnection with the Williams Partners L.P.’s gas pipeline – Transco (“Transco”) system at its compressor station 165 in Pittsylvania County, Virginia.”²³

The report further tied MVP to Transco in section 4 titled Statement of rates. The report stated that rates are “contingent upon MVP placing into service capacity to the Transco Station 165 Interconnect.”²⁴ The MVP and Transco ties are listed throughout the Mountain Valley Pipeline Final Environmental Impact Statement (FEIS). I will list a few of those instances here.

Employment to Which the Act May Apply; Enterprise Coverage Subjgrp 261. Unified Operation or Common Control Section 779.221. “Common control” defined.

²¹ Ibid, pp. 3-4

²² FERC Application, Nov. 6, 2018, pp. 7-8

²³ Southeast U.S. Natural Gas Market Demand in Support of the Mountain Valley Pipeline Project, Wood Mackenzie, January 2016, p.3

²⁴ Ibid. Section 4-1 – 4-4

The FEIS addresses the potential environmental effects of the construction and operation of the proposed facilities. For the MVP those facilities include: “about 304 miles of new 42-inch-diameter pipeline extending from the new Mobley Interconnect in Wetzel County, West Virginia to the existing Transcontinental Gas Pipe Line Company LLC (Transco) Station 165 in Pittsylvania County, Virginia; 4 new meter and regulation stations and interconnections (Mobley, Sherwood, WB, and Transco);”²⁵ “The MVP includes four interconnections or tie-ins with facilities operated by Equitrans, Columbia Gas Transmission LLC (Columbia), and Transcontinental Gas Pipe Line Company LLC (Transco).”²⁶

The FEIS mentioned that “Specifically, the MVP would deliver the identified gas volumes (2 Bcf/d) to five contracted shippers via a pooling point at Transco Station 165 in Pittsylvania County, Virginia; while the EEP would deliver contracted volumes of 0.4 Bcf/d (with potential for an additional 0.2 Bcf/d) to various end users”²⁷

“The terminus for the MVP pipeline at Transco Station 165 is the existing pooling point for Zone 5 on Transco’s system and a gas trading hub for the Mid-Atlantic market.”²⁸

“The general purpose of the MVP is to transport about 2.0 Bcf/d of natural gas from production areas in southern Pennsylvania and northern West Virginia via a new 42-inch-diameter 303.5-mile-long pipeline, beginning at the Mobley Interconnect and receipt M&R station in Wetzel County, West Virginia and terminating at the Transco Interconnect and delivery M&R station, at the existing Transco Station 165, in Pittsylvania County, Virginia. Shippers would be able to take the gas from the Transco Station 165 to markets along the east coast.”²⁹

The MVP project includes a “Transco Interconnect (delivery with pig receiver & MLV 36)”³⁰

“The Transco Interconnect and delivery M&R station would be located at MP 303.5, at the terminus of the MVP pipeline in Pittsylvania County, Virginia. The site would include a gravel yard enclosed by a chain link fence. Mountain Valley proposes to interconnect with four existing Transco pipelines at existing Station 165 (Pipelines A and B are 30 inches in diameter; Pipeline C is 36 inches in diameter; and Pipeline D is 42 inches in diameter). Components of the Transco Interconnect and M&R station would include five gas filter separators, six 16-inchltrasonic gas meter runs, four 16-inch overpressure protection/flow control meter runs, two 26-inch overpressure protection security valve runs, and a pig receiver. The pig receiver would attach directly to the MVP pipeline. A meter building would enclose the meter runs and a control valve building would enclose the control valve runs. One electronics building would be erected for Transco’s equipment, and another for Mountain Valley’s.”³¹

One additional item that I’ll list is from Table 2.3-1: Land Requirements Associated with the Mountain Valley Project and the Equitrans Expansion Project lists Transco Interconnect & North/South Launcher Receiver Sites (MVP)³²

²⁵ MVP FEIS, p. 2

²⁶ Ibid. 1-2

²⁷ Ibid. 1-8

²⁸ Ibid.

²⁹ Ibid. 2-3

³⁰ Ibid. 2-12

³¹ Ibid. 2-14

³² Ibid. 2-22

In Summary

DEQ must deny this air permit at this time. It is premature to issue an air permit when both the MVP mainline and MVP Southgate extension projects have not secured all the necessary permits and approvals to be completed. DEQ needs to fully explain the applicability of common control for these three adjacent compressor stations.

While we appreciate DEQ requiring additional pollution controls that have reduced NOx, CO and Formaldehyde emissions, several pollutants including SO₂, PM 2.5 and Greenhouse Gases increased slightly with the June 30, 2020 revised application.

Permit annual limits for CO and VOCs need to be significantly reduced.

Respectfully submitted,



Mark E. Barker
Executive Assistant
Blue Ridge Environmental Defense League
1828 Brandon Ave. SW
Roanoke, VA 24015
(540) 342-5580 (home/office)
(540) 525-5241 (cell)
mebarker@cox.net
mbarker@bredl.org

Attachment 1

A summary of Mountain Valley Pipeline litigation

- Sierra Club et al v. U.S. Army Corps of Engineers: Two lawsuits filed Sept. 28 in the 4th U.S. Circuit Court of Appeals, challenging the Army Corps' stream-crossing permits awarded to Mountain Valley in Virginia and West Virginia. The 4th Circuit has stayed the permits until it can decide the case.
- Appalachian Voices et al v. U.S. Department of Interior: Filed Oct. 27 in the 4th U.S. Circuit Court of Appeals, challenging the U.S. Fish and Wildlife Service's finding that pipeline construction would not jeopardize endangered or threatened species.
- Sierra Club et al v. Federal Energy Regulatory Commission: Filed Dec. 22 in the U.S. Circuit Court of Appeals for the District of Columbia, challenging FERC's October decisions to lift a stop-work order and give Mountain Valley another two years to complete the pipeline.
- Wild Virginia et al v. U.S. Forest Service: Filed Jan. 11 in the 4th U.S. Circuit Court of Appeals, challenging the Forest Service's decision to allow the pipeline to pass through the Jefferson National Forest in Montgomery and Giles counties and Monroe County, West Virginia.
- Wild Virginia et al v. U.S. Bureau of Land Management: Filed Jan. 20 in the 4th U.S. Circuit Court of Appeals, challenging the bureau's right of way permit for the pipeline to pass through the Jefferson National Forest.³³
- On January 29, 2021, conservation groups filed a request in the U.S. Court of Appeals for the D.C. Circuit, asking the court to stay three orders the Federal Energy Regulatory Commission (FERC) issued for the Mountain Valley Pipeline in the last two months (attached). The groups are asking the court to stay all new construction on the pipeline and to act on the motion by February 22, 2021, to head off further destruction by MVP.³⁴

³³ The Roanoke Times, Jan. 25, 2021, https://roanoke.com/business/local/regulatory-route-becomes-more-complicated-for-mountain-valley-pipeline/article_32d75600-5cf6-11eb-b07c-538c7f715bb6.html

³⁴ <https://bluevirginia.us/2021/02/conservation-groups-file-request-for-emergency-stay-of-ferc-approvals-on-mountain-valley-pipeline>

Attachment 2

Comparing the 1-mile EJScreen Reports.

Note the discrepancies in location and population. EJ Indexes remain the same.

VA DEQ EJScreen Report

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EJSCREEN Report (Version 2019)



1 miles Ring Centered at 36.832436,-79.336099, VIRGINIA, EPA

Region 3 Approximate Population: 49

Input Area (sq. miles): 3.14

Lambert Station



Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	53	59	48
EJ Index for Ozone	53	60	48
EJ Index for NATA* Diesel PM	57	63	51
EJ Index for NATA* Air Toxics Cancer Risk	53	58	47
EJ Index for NATA* Respiratory Hazard Index	53	57	47
EJ Index for Traffic Proximity and Volume	47	53	44
EJ Index for Lead Paint Indicator	31	50	33
EJ Index for Superfund Proximity	48	56	42
EJ Index for RMP Proximity	60	66	55
EJ Index for Hazardous Waste Proximity	48	55	44
EJ Index for Wastewater Discharge Indicator	N/A	76	74



VA DEQ EJScreen Report

Attachment-3
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EJSCREEN Report (Version 2019)



1 miles Ring Centered at 36.832436,-79.336099, VIRGINIA, EPA Region 3

Approximate Population: 49

Input Area (sq. miles): 3.14

Lambert Station

Selected Variables	Value	State Avg.	%ile in State	EPA %ile in Region EP	USA Avg.	%ile in USA
Environmental Indicators						
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.05	7.79	64	8.64	29	40
Ozone (ppb)	41.2	42.5	33	44.9	11	35
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.174	0.425	11	0.477	<50th	<50th
NATA* Cancer Risk (lifetime risk per million)	30	31	43	31	<50th	<50th
NATA* Respiratory Hazard Index	0.39	0.41	41	0.4	<50th	<50th
Traffic Proximity and Volume (daily traffic count/distance to)	53	570	30	640	25	25
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	68	0.36	46	56
Superfund Proximity (site count/km distance)	0.055	0.11	44	0.15	34	45
RMP Proximity (facility count/km distance)	0.041	0.38	2	0.62	2	3
Hazardous Waste Proximity (facility count/km distance)	0.23	0.66	47	1.3	34	38
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.8	N/A	30	22	37
Demographic Indicators						
Demographic Index	28%	32%	40	30%	57	46
Minority Population	22%	27%	34	32%	50	41
Low Income Population	33%	26%	67	28%	66	56
Linguistically Isolated Population	4%	3%	76	3%	78	66
Population With Less Than High School Education	3%	11%	22	11%	20	19
Population Under 5 years of age	3%	6%	25	6%	26	24
Population over 64 years of age	25%	14%	88	16%	87	88

BREDL EJScreen Report using EPA website



EJSCREEN Report (Version 2019)



1 miles Ring Centered at 36.826774,-79.341626, VIRGINIA, EPA Region 3

Approximate Population: 181

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	53	59	48
EJ Index for Ozone	53	60	48
EJ Index for NATA* Diesel PM	57	63	51
EJ Index for NATA* Air Toxics Cancer Risk	53	58	47
EJ Index for NATA* Respiratory Hazard Index	53	57	47
EJ Index for Traffic Proximity and Volume	47	53	44
EJ Index for Lead Paint Indicator	31	50	33
EJ Index for Superfund Proximity	48	56	42
EJ Index for RMP Proximity	60	66	55
EJ Index for Hazardous Waste Proximity	48	55	44
EJ Index for Wastewater Discharge Indicator	N/A	76	74

BREDL EJScreen Report using EPA website



EJSCREEN Report (Version 2019)



1 miles Ring Centered at 36.826774, -79.341626, VIRGINIA, EPA Region 3

Approximate Population: 181

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.05	7.79	64	8.64	29	8.3	40
Ozone (ppb)	41.2	42.5	33	44.9	11	43	35
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.174	0.425	11	0.477	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	30	31	43	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.39	0.41	41	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	53	570	30	640	25	750	25
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	68	0.36	46	0.28	56
Superfund Proximity (site count/km distance)	0.055	0.11	44	0.15	34	0.13	45
RMP Proximity (facility count/km distance)	0.041	0.38	2	0.62	2	0.74	3
Hazardous Waste Proximity (facility count/km distance)	0.23	0.66	47	1.3	34	4	38
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.8	N/A	30	22	14	37
Demographic Indicators							
Demographic Index	28%	32%	49	30%	57	36%	46
Minority Population	22%	37%	34	32%	50	39%	41
Low Income Population	33%	26%	67	28%	66	33%	56
Linguistically Isolated Population	4%	3%	76	3%	78	4%	66
Population With Less Than High School Education	3%	11%	22	11%	20	13%	19
Population Under 5 years of age	3%	6%	25	6%	26	6%	24
Population over 64 years of age	25%	14%	88	16%	87	15%	88

Comparing the 2-mile EJScreen Reports.

Note the discrepancies in location and population. Most of the EJ Indexes remain the same; however, there are slight differences in the Superfund and RMP proximities. As well as slight differences with demographics.

VA DEQ EJScreen Report

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EJSCREEN Report (Version 2019)

2 miles Ring Centered at 36.832436,-79.336099, VIRGINIA, EPA Region 3

Approximate Population: 481

Input Area (sq. miles): 12.56
Lambert Station

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ			
EJ Index for PM2.5	52	59	47
EJ Index for Ozone	53	59	48
EJ Index for NATA* Diesel PM	56	62	50
EJ Index for NATA* Air Toxics Cancer Risk	52	58	47
EJ Index for NATA* Respiratory Hazard Index	52	57	46
EJ Index for Traffic Proximity and Volume	46	52	43
EJ Index for Lead Paint Indicator	31	50	33
EJ Index for Superfund Proximity	47	55	41
EJ Index for RMP Proximity	60	66	55
EJ Index for Hazardous Waste Proximity	47	55	44
EJ Index for Wastewater Discharge Indicator	N/A	76	74

VA DEQ EJScreen Report

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EJSCREEN Report (Version 2019)



2 miles Ring Centered at 36.832436,-79.336099, VIRGINIA, EPA Region 3
Approximate Population: 481
Input Area (sq. miles): 12.56
Lambert Station

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.05	7.79	64	8.64	29	8.3	40
Ozone (ppb)	41.2	42.5	33	44.9	11	43	35
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.173	0.425	11	0.477	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	30	31	43	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.39	0.41	40	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to)	53	570	30	640	25	750	25
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	68	0.36	46	0.28	56
Superfund Proximity (site count/km distance)	0.057	0.11	46	0.15	35	0.13	46
RMP Proximity (facility count/km distance)	0.042	0.38	3	0.62	2	0.74	3
Hazardous Waste Proximity (facility count/km distance)	0.23	0.66	47	1.3	34	4	38
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.8	N/A	30	22	14	37
Demographic Indicators							
Demographic Index	27%	32%	49	30%	57	36%	45
Minority Population	22%	37%	33	32%	49	39%	40
Low Income Population	33%	26%	67	28%	66	33%	56
Linguistically Isolated Population	3%	3%	75	3%	77	4%	65
Population With Less Than High School Education	4%	11%	26	11%	25	13%	23
Population Under 5 years of age	4%	6%	25	6%	27	6%	25
Population over 64 years of age	24%	14%	88	16%	86	15%	88

BREDL EJScreen Report using EPA website



EJSCREEN Report (Version 2019)



2 miles Ring Centered at 36.826774,-79.341626, VIRGINIA, EPA Region 3

Approximate Population: 419

Input Area (sq. miles): 12.56

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	52	59	47
EJ Index for Ozone	53	59	48
EJ Index for NATA* Diesel PM	56	62	50
EJ Index for NATA* Air Toxics Cancer Risk	52	58	47
EJ Index for NATA* Respiratory Hazard Index	52	57	46
EJ Index for Traffic Proximity and Volume	46	52	43
EJ Index for Lead Paint Indicator	31	50	33
EJ Index for Superfund Proximity	46	55	41
EJ Index for RMP Proximity	59	66	55
EJ Index for Hazardous Waste Proximity	47	55	44
EJ Index for Wastewater Discharge Indicator	N/A	76	74

BREDL EJScreen Report using EPA website



EJSCREEN Report (Version 2019)



2 miles Ring Centered at 36.826774,-79.341626, VIRGINIA, EPA Region 3

Approximate Population: 419

Input Area (sq. miles): 12.56

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.05	7.79	64	8.64	29	8.3	40
Ozone (ppb)	41.2	42.5	33	44.9	11	43	35
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.173	0.425	11	0.477	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	30	31	43	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.39	0.41	40	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	53	570	30	640	25	750	25
Lead Paint Indicator (% Pre-1960 Housing)	0.24	0.21	68	0.36	46	0.28	56
Superfund Proximity (site count/km distance)	0.057	0.11	46	0.15	36	0.13	47
RMP Proximity (facility count/km distance)	0.042	0.38	3	0.62	2	0.74	3
Hazardous Waste Proximity (facility count/km distance)	0.23	0.66	47	1.3	35	4	38
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.8	N/A	30	22	14	37
Demographic Indicators							
Demographic Index	27%	32%	48	30%	57	36%	45
Minority Population	21%	37%	32	32%	49	39%	40
Low Income Population	33%	26%	67	28%	66	33%	56
Linguistically Isolated Population	3%	3%	75	3%	77	4%	65
Population With Less Than High School Education	4%	11%	27	11%	25	13%	23
Population Under 5 years of age	4%	6%	25	6%	27	6%	25
Population over 64 years of age	24%	14%	88	16%	86	15%	88

Comparing the 5-mile EJScreen Reports.

Note the discrepancies in location and population. As expected, the 5-mile radius indicates more differences because of the ½ mile difference in the centered locations between the VA DEQ and BREDL EJScreen runs.

The EJ Indexes are higher in the BREDL EJScreen run based on the proper location of the LCS facility. The minority and low-income populations are slightly higher using the BREDL EJScreen run compared to the VA DEQ report, while the over-65 population is lower on the VA DEQ run.

VA DEQ EJScreen Report

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EJSCREEN Report (Version 2019)

5 miles Ring Centered at 36.832436,-79.336099, VIRGINIA, EPA Region 3

Approximate Population: 4,323

Input Area (sq. miles): 78.53
Lambert Station

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	61	66	56
EJ Index for Ozone	62	66	56
EJ Index for NATA* Diesel PM	63	67	56
EJ Index for NATA* Air Toxics Cancer Risk	62	66	56
EJ Index for NATA* Respiratory Hazard Index	62	66	56
EJ Index for Traffic Proximity and Volume	53	57	48
EJ Index for Lead Paint Indicator	42	58	42
EJ Index for Superfund Proximity	58	64	51
EJ Index for RMP Proximity	63	68	57
EJ Index for Hazardous Waste Proximity	66	69	59
EJ Index for Wastewater Discharge Indicator	N/A	76	74

VA DEQ EJScreen Report

Attachment-4
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EJSCREEN Report (Version 2019)



5 miles Ring Centered at 36.832436,-79.336099, VIRGINIA, EPA Region 3

Approximate Population: 4,323

Input Area (sq. miles): 78.53

Lambert Station

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.06	7.79	65	8.64	29	8.3	40
Ozone (ppb)	41.2	42.5	32	44.9	10	43	34
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.167	0.425	10	0.477	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	30	31	43	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.39	0.41	40	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to	52	570	29	640	25	750	25
Lead Paint Indicator (% Pre-1960 Housing)	0.39	0.21	82	0.36	62	0.28	69
Superfund Proximity (site count/km distance)	0.058	0.11	47	0.15	37	0.13	47
RMP Proximity (facility count/km distance)	0.044	0.38	3	0.62	2	0.74	3
Hazardous Waste Proximity (facility count/km distance)	0.25	0.66	50	1.3	37	4	40
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.8	N/A	30	22	14	37
Demographic Indicators							
Demographic Index	33%	32%	59	30%	64	36%	54
Minority Population	30%	37%	46	32%	59	39%	50
Low Income Population	35%	26%	69	28%	68	33%	58
Linguistically Isolated Population	2%	3%	65	3%	68	4%	55
Population With Less Than High School Education	13%	11%	67	11%	69	13%	62
Population Under 5 years of age	4%	6%	25	6%	28	6%	25
Population over 64 years of age	21%	14%	79	16%	76	15%	80

BREDL EJScreen Report using EPA website



EJSCREEN Report (Version 2019)



5 miles Ring Centered at 36.826774,-79.341626, VIRGINIA, EPA Region 3

Approximate Population: 4,848

Input Area (sq. miles): 78.53

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	66	70	60
EJ Index for Ozone	66	70	60
EJ Index for NATA* Diesel PM	65	69	59
EJ Index for NATA* Air Toxics Cancer Risk	66	70	60
EJ Index for NATA* Respiratory Hazard Index	66	70	60
EJ Index for Traffic Proximity and Volume	66	69	59
EJ Index for Lead Paint Indicator	72	72	65
EJ Index for Superfund Proximity	65	69	58
EJ Index for RMP Proximity	65	69	58
EJ Index for Hazardous Waste Proximity	72	72	64
EJ Index for Wastewater Discharge Indicator	N/A	76	74

BREDL EJScreen Report using EPA website



EJSCREEN Report (Version 2019)

5 miles Ring Centered at 36.826774,-79.341626, VIRGINIA, EPA Region 3

Approximate Population: 4,848

Input Area (sq. miles): 78.53



Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.06	7.79	65	8.64	29	8.3	40
Ozone (ppb)	41.2	42.5	33	44.9	10	43	35
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.169	0.425	10	0.477	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	30	31	43	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.39	0.41	40	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	53	570	29	640	25	750	25
Lead Paint Indicator (% Pre-1960 Housing)	0.39	0.21	82	0.36	62	0.28	69
Superfund Proximity (site count/km distance)	0.059	0.11	47	0.15	37	0.13	48
RMP Proximity (facility count/km distance)	0.044	0.38	3	0.62	2	0.74	3
Hazardous Waste Proximity (facility count/km distance)	0.28	0.66	53	1.3	39	4	42
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.8	N/A	30	22	14	37
Demographic Indicators							
Demographic Index	35%	32%	62	30%	67	36%	57
Minority Population	33%	37%	49	32%	62	39%	53
Low Income Population	36%	26%	71	28%	70	33%	60
Linguistically Isolated Population	2%	3%	69	3%	72	4%	59
Population With Less Than High School Education	13%	11%	68	11%	71	13%	63
Population Under 5 years of age	3%	6%	23	6%	25	6%	23
Population over 64 years of age	19%	14%	74	16%	69	15%	74

Archived: Friday, March 5, 2021 7:20:50 AM

From: [Anita Royston](#)

Sent: Thursday, March 4, 2021 1:00:23 PM

To: anita.walthall@deq.virginia.gov

Subject: Approved Comment Letter

Importance: Normal

Attachments:

[Approved Comment Letter.doc](#) ;

--

Anita Royston

President, PCNAACP

(916) 475-7162

naacppittsyco@gmail.com

Approved Comment Letter.doc



NAACP

PITTSYLVANIA COUNTY BRANCH

March 3, 2021

Anita Walthall
VA DEQ
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
Phone: 540-562-6769
Email: anita.walthall@deq.virginia.gov
delivered via email

Comments regarding Air Permit Registration Number 21652, Mountain Valley Pipeline LLC, Lambert Compressor Station, 987 Transco Rd Chatham, VA 24531

Dear Ms. Walthall:

We, the National Association for the Advancement of Colored People (NAACP) – Pittsylvania County Branch #7096, and all Virginians have an interest in air quality. We also have an interest in environmental justice.

We ask that the Virginia Department of Environmental Quality (DEQ) deny the Minor New Source Review Permit (air permit) requested by Mountain Valley Pipeline (MVP) at this time and refer the draft permit to the Air Pollution Control Board (Air Board).

The proposed Lambert Compressor Station is part of the MVP Southgate Extension (MVP Southgate), a pipeline intended to transport fracked gas through Pittsylvania County, Virginia, to North Carolina for use in that state only. MVP Southgate is entirely dependent upon the MVP Mainline, which, if completed, would deliver fracked gas from Wetzel County, West Virginia to Transcontinental Pipe Line Company, LLC's (Transco) Compressor Stations 165 and 166 in Pittsylvania County, Virginia, for distribution to the Southeastern U.S.

Air Quality

The public notice soliciting comment on the draft air permit issued by DEQ under the authority of the Air Pollution Control Board states, "There will be no adverse impact on the air quality near the facility." This does not make sense. The Lambert Compressor Station will emit tons of carbon monoxide, sulfur dioxide, particulate matter,

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formaldehyde and other volatile organic compounds, all known to have harmful effects on human health and the environment. Pollutants, by definition, affect air quality.

The proposed location of the MVP Lambert Compressor Station is adjacent to the existing Transco Compressor Stations 165 and 166. This site location means that communities affected by Transco emissions for sixty years will be affected by yet another emissions source. MVP will add to the cumulative damage done by Transco compressor station pollution. We understand that respiratory disease risks go up with even small increases in exposure to toxic substances and particulate matter, especially minute particles. Pittsylvania County residents exposed for decades should not be subject to harmful emissions from a new source.

On January 7, 2020, the 4th Circuit Court of Appeals revoked an air permit issued to Dominion Energy for a compressor station in the predominantly African American community of Union Hill in Buckingham County despite stringent air quality requirements, stating “What matters is whether the (Air Pollution Control Board) has performed its statutory duty to determine whether this facility is suitable for this site, in light of [environmental justice] and potential health risks for the people of Union Hill. It has not.”

Environmental Justice = Fair Treatment + Meaningful Participation

In its *Draft Engineering Analysis*, DEQ quotes the essentially identical Virginia Environmental Justice Act and U.S. Environmental Protection Agency (EPA) definitions of environmental justice and fair treatment:

- **Environmental justice** is the *fair treatment and meaningful participation* of all people . in the development, implementation, and enforcement of environmental laws, regulations, and policies.
- **Fair treatment** means that “no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.”

DEQ’s *Draft Engineering Analysis* leaves out the definition of meaningful participation. Virginia Environmental Justice Act gives this definition:

- “**Meaningful participation** means the requirements that (i) affected and vulnerable community residents have access and opportunities to participate in the full cycle of the decision-making process about a proposed activity that will affect

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their environment or health and (ii) decision makers will seek out and consider such participation, allowing the views and perspectives of community residents to shape and influence the decision.”

MVP announced the MVP Southgate project in the spring of 2018. Many decisions about the project were made long before 2020 when “DEQ requested that the applicant (MVP) conduct an environmental justice review” and MVP “invited” Alexandra Sutton Lawrence of Land & Heritage Consulting, LLC to evaluate environmental justice issues related to the Lambert Compressor Station.

Despite MVP and DEQ having acknowledged that the Lambert Compressor Station has the potential to affect communities of color, MVP’s environmental justice consultant did not contact us, the local Pittsylvania Branch NAACP, at all; and neither MVP nor DEQ contacted us until December 2020. We strongly hold that “affected and vulnerable community residents” of Pittsylvania County have not “had access and opportunities to participate in the full cycle of the decision-making process” about the MVP Southgate project, including the Lambert Compressor Station.

Discrepancies and Errors:

- ***MVP’s Supplemental Materials on Environmental Justice***
- ***Land & Heritage Consulting, LLC’s Community Impact Assessment of Lambert Compressor Station***

MVP submitted *Supplemental Materials on Environmental Justice*, including the Land & Heritage Consulting report, *Community Impact Assessment of Lambert Compressor Station*, to DEQ on September 16, 2020. There are substantial inconsistencies between MVP’s discussion of environmental justice and the consultant’s report. While touting the consultant’s “far-reaching analysis,” MVP misstates the report’s conclusions and limits discussion of environmental justice to a one-mile radius around the Lambert Compressor Station.

- ***Discrepancy Regarding Consultant’s Conclusion***

MVP states, “The analysis concludes that environmental justice communities exist in the vicinity of the Station, but that no environmental justice community—indeed, no community—bears a disproportionate share of any negative environmental consequences.” Nowhere does the Land & Heritage Consulting analysis draw this conclusion.

In sharp contrast, the consultant’s executive summary states,

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“The primary adverse impacts to ‘fenceline communities’ associated with the construction of compressor station include temporary noise, dust/particulate matter, and traffic impacts; the primary impacts from operations include air emissions and noise...

“Based on the broad definitions of the Virginia Environmental Justice Act, all census tracts within a 3-mile [and 5-mile and 10-mile] fenceline buffer are considered environmental justice communities. The vulnerability of these communities to disproportionate negative impacts will require special consideration in the planning and siting process that is sensitive to the needs and concerns of the communities. We recommend that Mountain Valley identify and plan to avoid or mitigate any disproportionate impacts resulting from compressor station construction and operation to domains of culture and lifeways, as well as to community health, food access, and critical service provision. (O)ur recommendations are consistent across all radii.”

We find MVP’s unsupported conclusion to be hasty and self-serving.

- ***Discrepancy Regarding Impacted Area***

Consultant Lawrence states that MVP agreed to assess impacts within a three-mile radius of the proposed compressor station. MVP limits its discussion of adverse impacts to a one-mile radius and acknowledges only two relevant environmental justice communities.

Lawrence’s report identified a total of ten census tracts as environmental justice communities within ten miles of the proposed Lambert Compressor Station site, including:

- 2 communities of color and low-income within 3 miles
- 4 low-income communities, including 2 communities of color, within 4 miles
- 10 low-income communities, including 4 communities of color, within 10 miles

By “communities,” both MVP and its consultant are referring to census tracts. Missing from MVP’s submissions and all DEQ’s materials on this project is a detailed and accurate picture of the affected community in the vicinity of the proposed site. No ordinary person knows the census tract in which they live; yet, many African Americans in Pittsylvania County know they live in the minority-majority Banister voting district, site of the proposed MVP compressor station and the Transco stations. Residents of the Banister and adjacent Chatham-Blairs District should be informed of the invisible pollutants that may well have harmed their health over sixty years of Transco operations and the proposed emissions from yet another compressor station.

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We find MVP's narrow focus on a 1-mile radius extremely troubling. We understand that use of a 3-mile radius is standard practice and would be appropriate here. Use of a 3-mile or larger radius would more clearly reveal the people who have been breathing compressor station emissions for sixty years and who should have a say in whether they will be breathing more.

- ***Understating pre-existing exposures***

Both MVP and the consultant's report understate pre-existing exposure to particulate matter (PM_{2.5}) and pre-existing risk of cancer.

- MVP comments on EJSCREEN data for a 1-mile radius only: "(O)f the 11 indicators, only two were above the state average (PM_{2.5} and lead paint), while all were less than the 80th percentile in the state."
- The consultant's report states: "We did not identify any communities within a 3-mile radius with pre-existing exposure rates greater than the national average for PM 2.5 or ozone. We did not identify any communities within a 3-mile fenceline radius who are subject to cancer risk that exceeds the state or national averages," giving as a source the EPA EJSCREEN.

The EPA EJSCREEN itself contradicts these statements by MVP and the consultant. For particulate matter (PM 2.5), ozone, and cancer risk, the EJSCREEN report indicates the area is at the 53rd and 54th percentiles in Virginia, the 59th and 60th percentiles in the EPA Region, and 49th and 48th percentile in the USA – just barely below the national average.

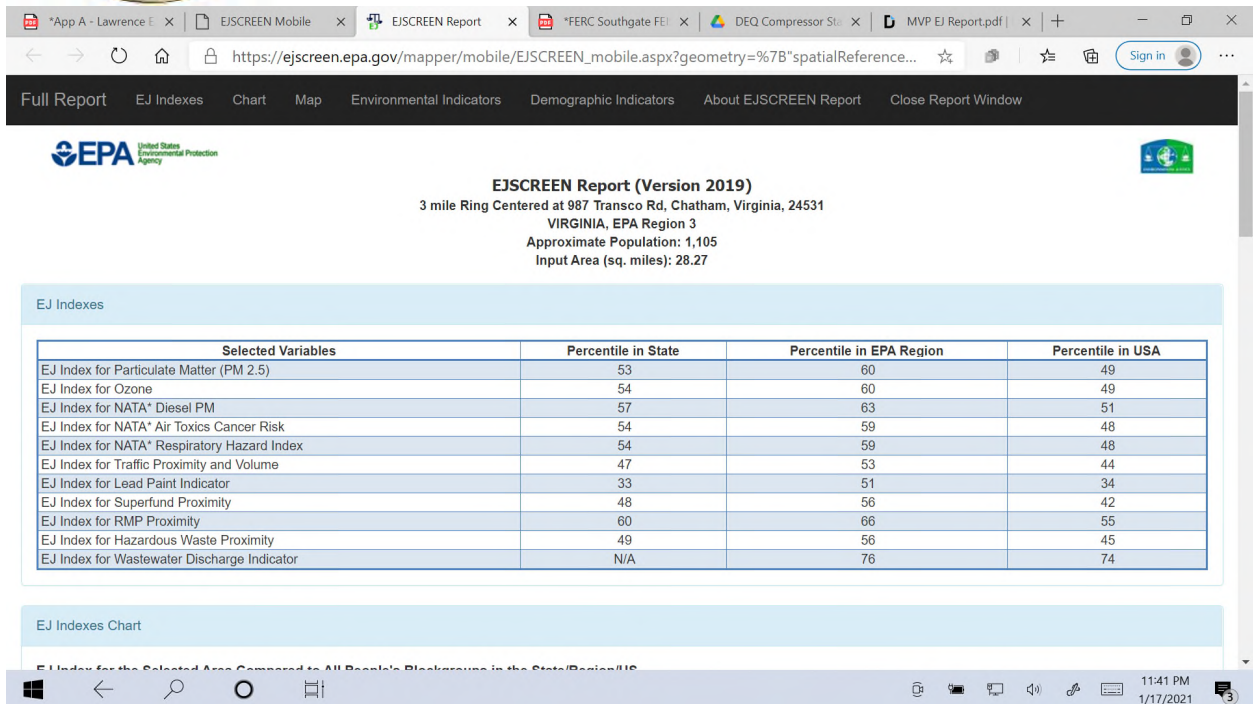
These pre-existing exposures near and above the state and national averages concern us and should concern DEQ.

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Inadequate “Ground Truthing” of Desktop Analysis

Consultant Lawrence acknowledges:

“Ground-truthing the results of our desktop analysis is an essential part of completing a successful community impact assessment. Failing to do so could potentially result in the exclusion of local minorities/people of color from the planning process; increases in community opposition due to lack of understanding, engagement and opportunity for input; and unjust outcomes in the distribution of benefits and risks across adjacent communities.”

Then Lawrence admits the gross inadequacy of her “ground-truthing” effort. Beginning July 1, 2020, she conducted only sixteen interviews lasting approximately 30 minutes by phone or Skype. Lawrence visited Pittsylvania County one time (August 26, 2020) and had no person-to-person contact. She blames the COVID-19 pandemic and protests in response to the killing of George Floyd for these inadequacies.

The consultant’s 16 interviews included:

- 9 interviews with non-Indigenous persons who live within 10 miles of the proposed compressor station, and

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P.O. Box 1072 Chatham, VA 24531 Phone: 916-475-7162 | naacppittsyco@gmail.com



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- 7 interviews with Indigenous interviewees who live in some unspecified larger area.

Interviewees are not further identified – not by income, race, ancestry, ethnicity, age, health status, work status or occupation, prior exposure to pollutants, etc.

We are perplexed by this statement:

“Although we identified a present and thriving African-American community, many of whom are descendants of the original Freedmen families who labored as enslaved persons in Pittsylvania county prior to Emancipation (and are connected to the current Blairs, Virginia community), our outreach did not result in any interviews specifically with members of that community for this report.”

Did the consultant interview any non-Indigenous people of color? Any Black people? Any African Americans? The consultant’s report is not at all clear.

The report states, “Due to the extremely sensitive nature of the project, the interviews we conducted are confidential.” The consultant seems to assume that the people interviewed somehow represent environmental justice communities in Pittsylvania County.

MVP is similarly unforthcoming when it writes of contact with “local leaders” to ground-truth its findings. Without identification of “local leaders,” there is no accountability or opportunity for “affected and vulnerable community residents” to even know who presumes to speak for them, much less speak for themselves.

We do not feel or believe that we have been adequately represented by the 16 individuals interviewed by the consultant or the “local leaders” contacted by MVP. Furthermore, we feel and believe that the environmental justice review requested by DEQ, commissioned by MVP, and conducted by Land & Heritage Consulting does not meet the Virginia Environmental Justice Act requirement that “affected and vulnerable community residents have access and opportunities to participate in the full cycle of the decision-making process about a proposed activity that will affect their environment or health.”

Questioning the Reliability of MVP

In summarizing interview responses, MVP’s consultant reports,

- “A majority of our respondents were not familiar with the proposed Station.”
- “All respondents expressed some level of discomfort, distrust or skepticism about the Mountain Valley Pipeline or its parent companies.”

MVP’s *Supplemental Information on Environmental Justice* refers to many of the negative comments about the project as “sincere misperceptions or misconceptions about

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pipelines, compressor stations, or the scope of Station impacts.” We would counter that distrust of MVP and negative perceptions of the potential impacts of the compressor station are warranted, given MVP’s performance to date. Many county citizens have found MVP representatives to be unreliable information sources. MVP contractors on the MVP Mainline have violated regulations hundreds of times, trespassing, leaving fires unattended, and causing erosion and water contamination, even after being cited and fined. Skepticism regarding the MVP’s future performance and the company’s assessment of impacts and environmental justice is justified.

There is further evidence of MVP lack of transparency in the consultant’s recruitment email, which begins, “My colleagues and I at Land & Heritage have been asked by EquiTrans Midstream to conduct a Community Impact Assessment. We are not employed by Mountain Valley Pipeline, nor any of its subsidiaries.” According to the equitransmidstream.com website, “EQM Midstream Partners is the operator of MVP Southgate and owns a 47.2% interest in the MVP Southgate project.” This statement is misleading and appears to knowingly misrepresent the role of Land & Heritage Consulting as a paid contractor for MVP.

The consultant’s informed consent document states, “MVP is currently planning to submit a request for additional permits to Virginia DEQ, and I intend to submit this report as part of a package describing where they have caused harm or may potentially cause harm, and what they need to do to correct it.” Again, there is no clear acknowledgement that Alexa Lawrence and Land & Heritage Consulting work for MVP and that the study was intended to further the interests of MVP in obtaining a permit from DEQ (and the Air Board) to build and operate the Lambert Compressor Station.

We consider MVP an unreliable evaluator of environmental justice concerns. DEQ might better fulfill the spirit and requirements of the Virginia Environmental Justice Act by conducting its own environmental justice evaluation of the Lambert Compressor Station.

Request that DEQ Refer the Draft Permit to the Air Pollution Control Board

We, the Pittsylvania County Branch of NAACP request that DEQ deny the MVP Lambert Compressor Station air permit and elevate the permit review to the Air Pollution Control Board. We further ask that DEQ and the Air Board set a strong precedent for ensuring environmental justice by conducting a thorough and unbiased evaluation of environmental justice communities in Pittsylvania County and the cumulative and combined effects of existing and proposed compressor stations on these communities.

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The Federal Energy Regulatory Commission (FERC) granted conditional approval for construction of MVP Southgate Project, including the Lambert Compressor Station, in June 2020, stating that no construction begin until MVP obtains essential federal permits for the MVP Mainline and receives permission to restart construction halted due to poor performance and numerous lawsuits. MVP has not met these conditions. There is tremendous uncertainty as to when, or even if, the MVP Mainline will be completed.

DEQ and the Air Board do not need to rush the air permit review for the Lambert Compressor Station, which has no purpose if the MVP Mainline is abandoned.

DEQ and the Air Board need to

- identify environmental justice communities affected over the sixty years that Transco has operated here in Pittsylvania County, communities now at increased risk from an MVP compressor station;
- bring these communities into the decision-making process; and
- evaluate the cumulative and combined, past and future effects of the Transco and MVP compressor stations.

DEQ and the Air Board do not need to patronize residents of Pittsylvania County with assurances that a new compressor station would not impact air quality.

Teach us, in language we can understand, what we have been exposed to and will be exposed to. Then, let us think for ourselves, and invite us to comment again.

Respectfully submitted,

ANITA ROYSTON

Anita Royston, President
Pittsylvania County NAACP
916-475-7162

"Working towards freedom justice and equality for all since 1909"

Archived: Saturday, March 6, 2021 12:25:38 PM

From: [Donald Motley](#)

Sent: Friday, March 5, 2021 10:06:47 AM

To: Anita.Walthall@deq.virginia.gov

Subject: Comment on MVP Southgate Lambert station Air Permit Application

Importance: Normal

Attachments:

[DEQ Letter.png](#);

Dear Ms. Walthall,

On behalf of the Chatham Fire Department, please find the attached a letter in support of the MVP Southgate Lambert station air permit. Thank you for the opportunity to submit the enclosed letter.

Donald Motley, Chief

Chatham Fire Department

DEQ Letter.png



CHATHAM FIRE DEPARTMENT

P. O. BOX 192 • CHATHAM, VA 24531

Ms. Anita Walthall
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153

Dear Ms. Walthall:

On behalf of the Chatham Fire Department, I am requesting that DEQ and the Air Pollution Control Board approve the air permit for the Lambert Compressor Station. Chatham Fire Department services a large part of the Banister district as well as the area surrounding the proposed Lambert Station. This area is very rural and to my knowledge, the approximately 150 residents living within the 1.5 mile radius around the station do not present any environmental justice issue for the project.

Pittsylvania County businesses and residents are very conscious of their environment and are appreciative of the measures that Mountain Valley and Transco have taken to maintain a safe and clean community. The technology proposed for the new Lambert Station, along with the upgrades that Transco is conducting at this time, will actually reduce air emissions in the area. I have grown up here and lived here all my life, and I can say that Transco Village facilities have been operated safely and provided a clean environment to residents of our county for decades.

In addition, as a public servant of Pittsylvania County, I am thankful for companies like Mountain Valley who take part in our community and contribute to our economic livelihood.

I want to thank DEQ for the work they are doing in evaluating this project and for the opportunity to provide comments.

Respectfully submitted,

Donald Motley, Chief
Chatham Fire Department

Archived: Saturday, March 6, 2021 12:25:38 PM

From: [Terry Kelly](#)

Sent: Friday, March 5, 2021 10:33:43 AM

To: Anita.Walthall@deq.virginia.gov

Subject: Comment on MVP Southgate Lambert Station Air Permit Application

Importance: Normal

My name is Terry Kelly and I am a citizen of Pittsylvania County. I am writing this letter to offer my support of the MVP Southgate Lambert Compressor Station. I live near the pipeline route and have no complaints with the project. MVP Southgate has been completely honest and provided information concerning the project to everyone involved. I do not believe that the compressor station will adversely affect the air quality or the environment.

MVP and MVP Southgate have involved themselves in our community in numerous positive ways and I feel that they will continue to do so in the future and be a great asset to Pittsylvania County

Archived: Saturday, March 6, 2021 12:25:38 PM

From: [john r](#)

Sent: Friday, March 5, 2021 10:47:53 AM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Dear Ms. Walthall

My name is John Rosapepe and I was born in Portsmouth, Virginia 69 years ago. I am fortunate in my lifetime to have witnessed the passage and implementation of the Clean Air Act and the recent state legislation regarding environmental justice. I am writing specifically about the Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit because as a citizen of the commonwealth I am concerned about any permitting that would allow increased air pollution which harms the public in both the short and long term.

I am requesting the Department of Environmental Quality (DEQ) refer a public hearing to the full Air Pollution Control Board because of the many questions concerning cumulative pollution impacts, the insufficient information that has been presented about hazardous air pollutants and the adverse health impacts posed by this proposed project.

The Lambert Compression Station would not stand alone in adding pollutants to the immediate community. Two other compressor stations exist near where this station would be sited and the cumulative effects of these three stations must be evaluated together when evaluating this proposed permit. The information of the combined emissions of NOX, CO, VOC, PM, PM 10, PM 2.5 and SOX is both troubling and disturbing. The total emissions for carbon monoxide, nitrogen oxides and volatile organic compounds, are 408.5 tons/year, 628.91 tons/year, and 11.358 tons/year respectively. These projected combined emissions are analogous to having a Clean Air Act Title V Facility here.

This draft permit neglects to address several hazardous air pollutants (e.g., benzene, toluene, and xylenes) that would be produced by the Lambert Compressor Station. Not only does the permit omit hazardous air pollutants products from the proposed station, but it also ignores the cumulative emissions of these HAPs in the area when the two Transo compressor stations are factored in.

The health effects of NOX, CO, VOC, PM, PM 10, PM 2.5, SOX and Hazardous Air Pollutants on the immediate surrounding communities have not been properly addressed so far in the draft permit process. The Lambert Station would release 10.01 tons/year of PM 10 and 10.448 tons/year of PM 2.5. Exposure to particle pollution increases the risk of cardiac arrhythmias and heart attacks, and respiratory effects such as asthma attacks and bronchitis, especially among the elderly.

I respectfully ask that DEQ deny this permit.

Sincerely,

John Rosapepe
6900 Apamatica Lane
CHesterfield, VA 23838

Archived: Saturday, March 6, 2021 12:25:39 PM

From: billandjudy.dent@ntelos.net

Sent: Friday, March 5, 2021 11:01:42 PM

To: Anita Walthall

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

Sometimes when you get an itch it is hard to stop scratching even when you know it isn't stopping the itch. Continually trying to keep inching forward with this MVP seems much like that scratching that only gives relief when you stop. Stop wasting health, resources, and more on a project that cannot benefit the people or the environment.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

William Dent
1690 Glenside Dr.
Rockingham VA, 22801-2391

Archived: Saturday, March 6, 2021 12:25:39 PM

From: darcrowskelstar@hotmail.com@mg.gospringboard.io

Sent: Friday, March 5, 2021 10:28:52 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Bruce Rauscher
5118 Chowan Ave.
Alexandria VA, 22312-2005

Archived: Saturday, March 6, 2021 12:25:39 PM
From: charsing=comcast.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 10:13:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Charlotte Shnaider
30 Oak Lane
Staunton VA, 24401-2347

Archived: Saturday, March 6, 2021 12:25:39 PM

From: cheryj414@hotmail.com@mg.gospringboard.io

Sent: Friday, March 5, 2021 10:05:41 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Cheryl Arthur
160 Hessian Hills Way Apt. 1
Charlottesville VA, 22901-2518

Archived: Saturday, March 6, 2021 12:25:39 PM
From: lmc2va@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 10:02:44 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Linda Centorinno
10002 Terry st
Fairfax VA, 22031-3545

Archived: Saturday, March 6, 2021 12:25:39 PM
From: hitchfam6@msn.com[@mg.gospringboard.io](mailto:mg.gospringboard.io)
Sent: Friday, March 5, 2021 9:53:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

John Hitchins
2609 Longview Ave SW
Not Hispanic or Latino VA, 24014-1510

Archived: Saturday, March 6, 2021 12:25:39 PM
From: mlazenby@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 9:30:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Morgan Lazenby
16 Maccie St
Salem VA, 24153-2768

Archived: Saturday, March 6, 2021 12:25:39 PM
From: bhslater@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 9:23:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Bruce Supporter
4603 Monument Ave.
Richmond VA, 23230-3724

Archived: Saturday, March 6, 2021 12:25:39 PM
From: bunnifred@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 9:11:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jennifer Tulo
7134 Cold Spring Ct.
Alexandria VA, 22306-3520

Archived: Saturday, March 6, 2021 12:25:39 PM
From: kenubekat@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 9:06:02 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

K.L. Eckhardt
440 N Loudoun St.
Winchester VA, 22601-4853

Archived: Saturday, March 6, 2021 12:25:39 PM
From: kristap=ntelos.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 8:52:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Krista Powell
972 Smith Ave
Harrisonburg VA, 22802-2321

Archived: Saturday, March 6, 2021 12:25:39 PM
From: eketzrobinson@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 8:50:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Elizabeth Ketz-Robinson
7823 southdown rd
Alexandria VA, 22308-1343

Archived: Saturday, March 6, 2021 12:25:40 PM
From: pmsayre153@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 8:33:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Peter Sayre
6353 Lyric Ln
Falls Church VA, 22044-1218

Archived: Saturday, March 6, 2021 12:25:40 PM
From: malbon=vt.edu@mg.gospringboard.io
Sent: Friday, March 5, 2021 8:31:03 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Elizabeth Struthers Malbon
1391 Breckenridge Dr
Blacksburg VA, 24060-8617

Archived: Saturday, March 6, 2021 12:25:40 PM
From: joshuacapps@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 8:12:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Joshua Capps
7663 Sheffield Village Ln
Lorton VA, 22079-1718

Archived: Saturday, March 6, 2021 12:25:40 PM
From: aa4kp=genset.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 8:09:45 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Carol Metzger
954 Perkins Rd.
Kents Store VA, 23084-2344

Archived: Saturday, March 6, 2021 12:25:40 PM
From: adc6r@virginia.edumg.gospringboard.io
Sent: Friday, March 5, 2021 8:09:44 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

A Dean Caulfield
106A Monte Vista Ave
Charlottesville VA, 22903-4117

Archived: Saturday, March 6, 2021 12:25:40 PM

From: whatsallthisthen@comcast.net mg.gospringboard.io

Sent: Friday, March 5, 2021 6:29:45 PM

To: Anita Walthall

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jeffrey Schnebelen
806 Stafford Glen Court
Stafford VA, 22554-1766

Archived: Saturday, March 6, 2021 12:25:40 PM
From: heytlers@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:22:55 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Susan Heytler
5569 Dixons Mill Rd
Marshall VA, 20115-2726

Archived: Saturday, March 6, 2021 12:25:40 PM

From: elliott_daniels@comcast.net[@mg.gospringboard.io](mailto:elliott_daniels@mg.gospringboard.io)

Sent: Friday, March 5, 2021 6:22:46 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Elliot Daniels
4633A 28th Road South
Arlington VA, 22206-4115

Archived: Saturday, March 6, 2021 12:25:40 PM
From: cynthialonas@msn.com[@mg.gospringboard.io](mailto:mg.gospringboard.io)
Sent: Friday, March 5, 2021 6:22:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Cynthia Lonas
4901 Topping Ln
Glen Allen VA, 23060-2405

Archived: Saturday, March 6, 2021 12:25:40 PM

From: Royster, Maurice (Contractor)

Sent: Friday, March 5, 2021 6:19:18 PM

To: Martin, Keith; anita.walthall@deq.virginia.gov

Subject: Re: Comment on MVP Southgate Lambert Compressor Station Air Permit Application

Importance: Normal

Thanks for the update Keith. So much appreciate you, Barry and the Chamber for your continued support.

/m

Maurice Royster

Equitrans Midstream

The Olde Fire Hall

1007 E Watauga Ave

Johnson City TN 37601

423-833-6046

From: Martin, Keith <k.martin@vachamber.com>

Sent: Friday, March 5, 2021 4:59:18 PM

To: anita.walthall@deq.virginia.gov <anita.walthall@deq.virginia.gov>

Subject: [EXTERNAL] Comment on MVP Southgate Lambert Compressor Station Air Permit Application

Please find attached the Virginia Chamber's comments on the MVP Southgate Lambert Compressor Station air permit application. Thank you for your consideration.

Keith

Keith M Martin

Executive Vice President of Public Policy & Government Relations,

and General Counsel, Virginia Chamber of Commerce

Executive Director, Virginia Chamber Foundation

919 East Main Street, Suite 900

Richmond, Virginia 23219

Telephone: (804) 237-1456

Fax: (804) 783-6112

Archived: Saturday, March 6, 2021 12:25:40 PM
From: s_kalan@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:17:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Susan Kalan
293 E Main St.
Orange VA, 22960-1722

Archived: Saturday, March 6, 2021 12:25:40 PM
From: ellenkabat@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:17:40 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Ellen Kabat
878 Station St
Herndon VA, 20170-4608

Archived: Saturday, March 6, 2021 12:25:40 PM
From: ddtmagnolia@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:12:47 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

DeeDee Tostanoski
400 Madison Street
Alexandria VA, 22314-1772

Archived: Saturday, March 6, 2021 12:25:41 PM
From: kcnaser=comcast.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:11:45 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Cristeena Naser
191 Somerville St. Apt. 212
Alexandria VA, 22304-8213

Archived: Saturday, March 6, 2021 12:25:41 PM
From: cvmdsp=vt.edu@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:11:45 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Donna Pitt
216 Zells Mill Rd
Newport VA, 24128-4127

Archived: Saturday, March 6, 2021 12:25:41 PM

From: subbyholbrook@hotmail.com@mg.gospringboard.io

Sent: Friday, March 5, 2021 6:06:50 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Patricia Holbrook
403 McCarty Rd.
Clintwood VA, 24228-7836

Archived: Saturday, March 6, 2021 12:25:41 PM
From: jlgzz=cox.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:03:42 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Judith Zwelling
121 Oak Road
Williamsburg VA, 23185-3225

Archived: Saturday, March 6, 2021 12:25:49 PM
From: lindah70@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 6:02:40 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Linda Hertz
11649 Charter oak crt
reston VA, 20190-4528

Archived: Saturday, March 6, 2021 12:25:57 PM

From: bigadfromlb=comcast.net@mg.gospringboard.io

Sent: Friday, March 5, 2021 5:37:49 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Adam DOnofrio
25118 Smith Grove Rd
North Dinwiddie VA, 23803-7700

Archived: Saturday, March 6, 2021 12:26:05 PM
From: maremiller@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 5:24:47 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

Save Virginia's environmental legacy for all of its citizens.

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Mary Miller
6530 Stuart Ave
Richmond VA, 23226-3022

Archived: Saturday, March 6, 2021 12:26:15 PM

From: williamhuddle@msn.com @ mg.gospringboard.io

Sent: Friday, March 5, 2021 5:15:42 PM

To: Anita Walthall

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

William Huddle
555 W Fulton St
Wytheville VA, 24382-1028

Archived: Saturday, March 6, 2021 12:26:23 PM
From: brooke.kane@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 5:11:59 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Brooke Kane
6102 Franklin Park Rd
McLean VA, 22101-4232

Archived: Saturday, March 6, 2021 12:26:31 PM
From: jeanne184490@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 5:04:40 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Ellen Atkinson
1117 Stratford Rd
Lynchburg VA, 24502-1037

Archived: Saturday, March 6, 2021 12:26:39 PM
From: dizoo=comcast.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 5:04:00 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

David White
505 Park Plaza
Charlottesville VA, 22902-4627

Archived: Saturday, March 6, 2021 12:26:47 PM
From: capsbest08@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 5:01:56 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Christopher Dunn
13214 Oak Farm Dr
Woodbridge VA, 22192-3810

Archived: Saturday, March 6, 2021 12:26:55 PM

From: [Martin, Keith](#)

Sent: Friday, March 5, 2021 4:59:21 PM

To: anita.walthall@deq.virginia.gov

Subject: Comment on MVP Southgate Lambert Compressor Station Air Permit Application

Importance: Normal

Attachments:

[VA Chamber Comments to DEQ re MVP Southgate 3.5.21.pdf](#)

Please find attached the Virginia Chamber's comments on the MVP Southgate Lambert Compressor Station air permit application. Thank you for your consideration.

Keith

Keith M Martin

Executive Vice President of Public Policy & Government Relations,

and General Counsel, Virginia Chamber of Commerce

Executive Director, Virginia Chamber Foundation

919 East Main Street, Suite 900

Richmond, Virginia 23219

Telephone: (804) 237-1456

Fax: (804) 783-6112

VA Chamber Comments to DEQ re MVP Southgate 3.5.21.pdf



March 5, 2021

Anita Walthall
Blue Ridge Regional Office, Department of Environmental Quality
901 Russell Drive
Salem, Virginia 24153

Re: Air Permit Application – MVP Southgate

Dear Ms. Walthall,

Representing our more than 27,000 member companies, the Virginia Chamber of Commerce is the leading advocate for business and economic growth in the Commonwealth. The Chamber is dedicated to working at the state and federal levels to champion long-term economic growth in Virginia, and it is with this mission in mind that the Chamber supports the Mountain Valley Pipeline (MVP) Southgate's air permit application before the Virginia Department of Environmental Quality (DEQ).

As evidenced by the application and DEQ's analysis, the proposed Lambert Compressor Station will have no adverse impact on air quality in Pittsylvania County. The facility will be designed, constructed, and operated to ensure compliance with all air quality standards, and it meets the criteria for the minor new source review permit.

Now more than ever, the need for MVP Southgate is clear: Historic winter weather this year revealed weaknesses in existing supply lines and forced families to pay more for energy to heat their homes and run their businesses. The MVP Southgate project will provide greater access to affordable natural gas. It will also ensure the system has the flexibility and reliability that Virginia residents and business owners rely on and demand.

MVP Southgate is expected to generate millions of dollars in economic activity when it enters construction, providing hundreds of jobs for Virginians and substantial tax revenue for local and state governments. Manufacturing companies, like many major employers, depend on access to natural gas to fuel their business operations, because it is reliable and cleaner than coal, and it is also affordable and abundant in the U.S. These features allow businesses to increase efficiency, boost output, and pass along savings to consumers, while strengthening U.S. energy independence and reducing harmful emissions.

The Virginia Chamber of Commerce supports the MVP Southgate project and respectfully requests the Air Pollution Control Board approve the air permit for the Lambert Compressor Station in Pittsylvania County.

Best regards,

A handwritten signature in dark ink, reading "Barry E. DuVal". The signature is fluid and cursive, with the first name "Barry" being the most prominent.

Barry E. DuVal
President and CEO

Archived: Saturday, March 6, 2021 12:27:03 PM
From: ehembid@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:49:48 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Eileen Embid
2251 Eisenhower Ave
Alexandria VA, 22314-6900

Archived: Saturday, March 6, 2021 12:27:11 PM
From: bostonmass43@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:47:47 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Amy Cleveland
6247 Jefferson Park Rd. Apt. F
Prince George VA, 23875-2329

Archived: Saturday, March 6, 2021 12:27:19 PM
From: barhydt=cox.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:45:53 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Mary Barhydt
5555 Lakewood Dr.
Norfolk VA, 23509-1422

Archived: Saturday, March 6, 2021 12:27:27 PM

From: canterwoodfarm@gmail.com@mg.gospringboard.io

Sent: Friday, March 5, 2021 4:41:42 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Carol Miller
16662 Sommertime Ln.
Hamilton VA, 20158-3230

Archived: Saturday, March 6, 2021 12:27:36 PM
From: cynthia_howell@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:34:53 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Cynthia Howell
20200 Center Brook Square
Sterling VA, 20165-5196

Archived: Saturday, March 6, 2021 12:27:47 PM
From: stacy=sallerson.org@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:20:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Stacy Sallerson
11112 Sterling Cove Dr
Chesterfield VA, 23838-5158

Archived: Saturday, March 6, 2021 12:27:56 PM
From: mattioni.k@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:20:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Kristen Mattioni
6421 Back Creek Rd.
Boones Mill VA, 24065-2011

Archived: Saturday, March 6, 2021 12:28:04 PM
From: sarahvickers@msn.com
Sent: Friday, March 5, 2021 4:19:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Sarah Vickers
2713 Holly Street
Alexandria VA, 22305-1840

Archived: Saturday, March 6, 2021 12:28:12 PM
From: sjmckee1017@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:13:44 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Sally Mckee
233 Lauradell Road
Ashland VA, 23005-8217

Archived: Saturday, March 6, 2021 12:28:20 PM
From: bwelkowitz@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:10:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

William Welkowitz
1600 S. Eads St., Apt. 526N
Arlington VA, 22202-2972

Archived: Saturday, March 6, 2021 12:28:28 PM
From: shepherdess22=comcast.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:06:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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Sincerely,

Blaine Converse
927 Newsome Ct
Goochland VA, 23063-3240

Archived: Saturday, March 6, 2021 12:28:36 PM
From: bssquared@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:06:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

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Sincerely,

Elizabeth Spiher
4509 Muster Field Rd
Culpeper VA, 22701-8711

Archived: Saturday, March 6, 2021 12:28:44 PM
From: patwithcats@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:04:01 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

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Sincerely,

Pat Mace
13500 Black Meadow Rd.
Spotsylvania VA, 22553-4145

Archived: Saturday, March 6, 2021 12:28:52 PM
From: njriley38=comcast.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:03:56 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

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Sincerely,

Norma Riley
100 Shoe Buckle Ct
Stephens City VA, 22655-2893

Archived: Saturday, March 6, 2021 12:29:00 PM
From: byoho@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 4:01:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

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Sincerely,

Brad Yoho
23440 Somerset Crossing Place
Ashburn VA, 20148-8094

Archived: Saturday, March 6, 2021 12:29:05 PM
From: porterwj20191@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:54:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Janice Porter
2374 Branleigh Park Ct.
Reston VA, 20191-2813

Archived: Saturday, March 6, 2021 12:29:13 PM
From: bad965@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:54:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Brian Dunn
3943 Waterville Ct. #17
Henrico VA, 23233-1252

Archived: Saturday, March 6, 2021 12:29:21 PM

From: pdaniels1098@hotmail.com@mg.gospringboard.io

Sent: Friday, March 5, 2021 3:53:42 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Patricia Daniels
7563 Belle Grae Dr
Manassas VA, 20109-6416

Archived: Saturday, March 6, 2021 12:29:28 PM
From: ws9811=earthlink.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:50:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

William Staley
21930 Greentree Terrace
Sterling VA, 20164-7015

Archived: Saturday, March 6, 2021 12:29:36 PM
From: nuckols@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:50:44 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Mark Nuckols
7086 Long Point Rd
Exmore VA, 23350-4400

Archived: Saturday, March 6, 2021 12:29:44 PM
From: dscherer2=cox.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:50:40 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

KEEP IT CLEAN.....

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

David Scherer
500 Shaindel Dr.
Williamsburg VA, 23185-4356

Archived: Saturday, March 6, 2021 12:29:52 PM
From: prunedoc=cox.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:47:48 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Carol Pruner
1839 Maiden Ln.
Roanoke VA, 24015-2415

Archived: Saturday, March 6, 2021 12:30:00 PM
From: lisajok@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:45:51 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Lisa Kingsley
830 Westover Avenue
Norfolk VA, 23507-1526

Archived: Saturday, March 6, 2021 12:30:08 PM
From: davidsnewlin@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:11:48 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

David Newlin
12838 Sagle Road
Hillsboro VA, 20132-1837

Archived: Saturday, March 6, 2021 12:30:16 PM
From: seacob=comcast.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:11:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Barbara Seaman
147 N. French St.
Alexandria VA, 22304-2642

Archived: Saturday, March 6, 2021 12:30:23 PM
From: ramjclark=cox.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:10:47 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Marilyn Clark
101 Cedar Rock
Williamsburg VA, 23188-9216

Archived: Saturday, March 6, 2021 12:30:31 PM
From: fworth=earthlink.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:16:54 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Frederick Worth
12319 Wildwood Blvd
Ashland VA, 23005-3021

Archived: Saturday, March 6, 2021 12:30:39 PM
From: alexniconovich@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:16:03 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Alex Niconovich
2514 Jackson Parkway
Vienna VA, 22180-6921

Archived: Saturday, March 6, 2021 12:30:47 PM

From: [kayreibold](#)

Sent: Friday, March 5, 2021 3:14:24 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Drart Air Permit

Importance: Normal

Dear Ms. Walthall,

I am a concerned citizen requesting a Public Hearing before the full Air Pollution Control Board regarding an air permit for the Mountain Valley Pipeline Lambert Compression Station. I am requesting this hearing because of factors that I feel have not been adequately addressed by DEQ in consideration of issuing an air permit for this compressor station. Although I am not a Virginia resident, I have heart felt concerns for those living adjacent to this compressor station as I believe the toxic emissions of benzene and formaldehyde from the station and the release of particulate matter are gravely injurious to human health. I am especially concerned about elderly residents living near the station. Virginia residents living near this compressor station should not be subjected to these health hazards. I have questions about why this compressor station was selected to be located in an existing environmental justice community. There should be attention given to the cumulative impact of pollutants already existing in the community. The Mountain Valley Pipeline is in the middle of several legal challenges. This is not the right time to be focusing on infrastructure for a project with such uncertainty and which has known detrimental health hazards to the community.

Thank you.

Kay Reibold

4108 Yates Mill Pond Rd.

Raleigh, NC 27606

919 833 7885

Alliance to Protect the People and Places We Live/APPPL

Beyond Extreme Energy/BXE

Sent from my Verizon, Samsung Galaxy smartphone

Archived: Saturday, March 6, 2021 12:30:55 PM
From: lgravelle=copper.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:19:07 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Lynn Gravelle
14001 Spruce Ave.
Chester VA, 23836-3518

Archived: Saturday, March 6, 2021 12:31:03 PM
From: feathertree@msn.com[@mg.gospringboard.io](mailto:mg.gospringboard.io)
Sent: Friday, March 5, 2021 3:17:53 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Michele Shave
709 Autumn Tree
Williamsburg VA, 23188-1660

Archived: Saturday, March 6, 2021 12:31:08 PM
From: fhreid=outlook.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:17:51 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

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Sincerely,

Fred Reid
316 Harris Creek Rd
Louisa VA, 23093-4203

Archived: Saturday, March 6, 2021 12:31:16 PM
From: rjo1965@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:17:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

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The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Robert O'Brien
8002 Tolliver Rd.
Richmond VA, 23229-3359

Archived: Saturday, March 6, 2021 12:31:24 PM
From: amandapagay@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:08:51 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Amanda Pagay
601 Holland Lane
Alexandria VA, 22314-3576

Archived: Saturday, March 6, 2021 12:31:31 PM

From: arthurleibowitz@hotmail.com@mg.gospringboard.io

Sent: Friday, March 5, 2021 3:21:56 PM

To: Anita Walthall

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Arthur Leibowitz
3118 Lake Shire Ct
Nyack VA, 23235-6878

Archived: Saturday, March 6, 2021 12:31:39 PM
From: jwhartley77@msn.com @ mg.gospringboard.io
Sent: Friday, March 5, 2021 3:27:54 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

James Hartley
6027 26th Street North
Arlington VA, 22207-1210

Archived: Saturday, March 6, 2021 12:31:47 PM
From: adtrowbridge@liberty.edu@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:27:45 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Andrew Trowbridge
1231 Autumn Run Dr.
Forest VA, 24551-4777

Archived: Saturday, March 6, 2021 12:31:55 PM
From: roths=emhs.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:25:52 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Shannon Roth
1270 Lincolnshire Dr.
Harrisonburg VA, 22802-8352

Archived: Saturday, March 6, 2021 12:32:03 PM
From: klspurr1a@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:22:50 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Karen Spurr
1444 Ski Lodge Road
Virginia Beach VA, 23453-1816

Archived: Saturday, March 6, 2021 12:32:11 PM
From: 9bitte=embarqmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:22:48 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

Also, I do not believe we should build more pipelines, but we should ramp up all the energy alternative sources, from the usual wind and solar to wave and tidal energy, capturing energy from our trash, etc.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Lawrence Jacksina
1238 Timberbranch Ct
Charlottesville VA, 22902-7207

Archived: Saturday, March 6, 2021 12:32:19 PM
From: geneskis@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:35:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Gene Cochran
21124 shepard lane
Abingdon VA, 24211-5462

Archived: Saturday, March 6, 2021 12:32:27 PM
From: alaurio@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:34:50 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

No dirty energy projects, please! As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Alison Laurio
13 Shenandoah Commons Way
Front Royal VA, 22630-3773

Archived: Saturday, March 6, 2021 12:32:35 PM
From: cobbking=rockbridge.net@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:34:00 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia who has for years been speaking up against the Mountain Valley pipeline, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Margaret Dyson-Cobb
335 Enfield Rd
Lexington VA, 24450-1753

Archived: Saturday, March 6, 2021 12:32:42 PM
From: clarkdebf=msn.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:33:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Debbie Clark
11800 Sunset Hills Rd, #324
Reston VA, 20190-4779

Archived: Saturday, March 6, 2021 12:32:50 PM
From: jenniferk123@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:32:57 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jennifer Keys
20882 Isherwood Ter
Ashburn VA, 20147-7793

Archived: Saturday, March 6, 2021 12:32:59 PM
From: gem19466@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:31:48 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Gina Macias
9404 Brightway Ct.
Henrico VA, 23294-5555

Archived: Saturday, March 6, 2021 12:33:07 PM
From: vajera.uribe18@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:29:53 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Sandra Uribe
75 Laguna Rd.
Palmyra VA, 22963-2419

Archived: Saturday, March 6, 2021 12:33:15 PM
From: renuesch@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:43:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Raymond Nuesch
4555 Catterton Rd.
Free Union VA, 22940-1902

Archived: Saturday, March 6, 2021 12:33:23 PM
From: armstrong10306@hotmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:41:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Mary Armstrong
7205 Norwood Pond Ct.
Midlothian VA, 23112-1549

Archived: Saturday, March 6, 2021 12:33:32 PM
From: mbemail79@gmail.com@mg.gospringboard.io
Sent: Friday, March 5, 2021 3:39:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

The MVP is not needed and is damaging to Virginia's environment and communities. Only the power companies will profit. As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Mary Keller
834 Wales Dr
Highland Springs VA, 23075-1536

Archived: Monday, March 8, 2021 4:07:00 PM
From: davashadd@comcast.net
Sent: Saturday, March 6, 2021 9:51:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

Please deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes absolutely no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

David Addison
729 Burwell Ave
Staunton VA, 24401-3225

Archived: Monday, March 8, 2021 4:07:00 PM

From: barbaramccane1522@gmail.com @mg.gospringboard.io

Sent: Saturday, March 6, 2021 9:25:42 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Barbara McCane
1522 Philmont Ave.
Chesapeake VA, 23325-3720

Archived: Monday, March 8, 2021 4:07:01 PM
From: valjos=cox.net@mg.gospringboard.io
Sent: Saturday, March 6, 2021 5:40:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Valerie Joseph
11501 Cardoness Ln Unit 204
Fairfax VA, 22030-8589

Archived: Monday, March 8, 2021 4:07:01 PM
From: cindyspeas@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 3:46:44 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Cindy Speas
2724 Pioneer Ln
Falls Church VA, 22043-3411

Archived: Monday, March 8, 2021 4:07:01 PM
From: vpflyr4831@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 3:40:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

James Jeffrey
2508 Lower Greens Pl.
Virginia Beach VA, 23456-3593

Archived: Monday, March 8, 2021 4:07:01 PM
From: Donna Shaunesey
Sent: Saturday, March 6, 2021 3:08:17 PM
To: anita.walthall@deq.virginia.gov
Cc: elle@chesapeakeclimate.org
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Dear Ms. Walthall:

I am writing to express my concerns about this project, as well as the lack of transparency in the approval process (pointing out that there is still no public agenda for the upcoming meeting of the Air Pollution Control Board Public Engagement Committee Public Comment Meeting on March 10th).

It is clear that the project doesn't comply with the Commonwealth Energy Policy (§67-102 "8. Ensure that development of new, or expansion of existing, energy resources or facilities does not have a disproportionate adverse impact on economically disadvantaged or minority communities"). The folks in the area are already dealing with two Transco compressor stations; adding a third goes directly against this Energy Policy, as well as the Environmental Justice Act, the Virginia Clean Economy Act and the Regional Greenhouse Gas Initiative.

There has been no meaningful participation by the residents within a five to ten mile radius, either for decisions in planning, construction, maintenance nor final decommissioning. The Environmental Justice consultant's report is still incomplete and the outreach to the community has been grossly inadequate.

It is further clear that the health studies are inadequate.

I ask that you do the following:

- 1) Elevate this case to the Air Board to improve transparency and oversight.
- 2) Complete a meaningful Environmental Justice assessment
- 3) Improve the outreach to, and participation by, the local community
- 4) Undertake an examination of the applicant's claims (many are clearly inadequate at best, particularly with regard to hazardous pollutants, cumulative impact modeling and particulate matter)

Thank you for your attention to this critical matter,

Donna Shaunesey
434-996-0392
1003 Birdwood Road
Charlottesville VA 22903

Archived: Monday, March 8, 2021 4:07:01 PM
From: pugh.lindsay.a@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 3:03:54 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Lindsay Pugh
18432 Oak Ridge Ln.
Disputanta VA, 23842-6803

Archived: Monday, March 8, 2021 4:07:01 PM
From: vga.abraham@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 12:20:52 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Virginia Abraham
6626 Green Ash Ct
Springfield VA, 22152-2504

Archived: Monday, March 8, 2021 4:07:01 PM
From: nbglynn6@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 6:47:43 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Nancy Glynn
4510 Squiredale Sq
Alexandria VA, 22309-1234

Archived: Monday, March 8, 2021 4:07:01 PM
From: linmcdoug@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 8:24:49 AM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Linda McDougal
PO BOX 216
BARHAMSVILLE VA, 23011-0216

Archived: Monday, March 8, 2021 4:07:01 PM
From: lanzman.sarah@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 9:07:41 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Sarah Lanzman
1784 Simmons Gap Road
Dyke VA, 22935-1143

Archived: Monday, March 8, 2021 4:07:02 PM
From: jmaryc.123@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 9:34:49 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jessica Cassidy
1530 Hiddenbrook Dr
Herndon VA, 20170-2814

Archived: Monday, March 8, 2021 4:07:02 PM
From: vickisvarious@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 10:05:47 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Vicki Nelson
2400 Mare Ln
Oakton VA, 22124-1514

Archived: Monday, March 8, 2021 4:07:02 PM
From: charity.rome@hotmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 10:15:52 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Charity Moschopoulos
3617 Sprucedale Dr.
Amandale VA, 22003-1948

Archived: Monday, March 8, 2021 4:07:02 PM
From: zentsfamily=usa.net@mg.gospringboard.io
Sent: Saturday, March 6, 2021 10:24:44 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident and native of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Kathy Zentz
3189 Walkers Creek Rd
Middlebrook VA, 24459-2011

Archived: Monday, March 8, 2021 4:07:02 PM
From: pjiranek=comcast.net@mg.gospringboard.io
Sent: Saturday, March 6, 2021 10:37:48 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Pamela Jiranek
400 Forest Ridge Rd
Earlysville VA, 22936-9218

Archived: Monday, March 8, 2021 4:07:02 PM
From: zjmillimet@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 12:22:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Zachary Millimet
2303 Cavendish Dr
Alexandria VA, 22308-2117

Archived: Monday, March 8, 2021 4:07:02 PM
From: marilyn04616@gmail.com@mg.gospringboard.io
Sent: Saturday, March 6, 2021 12:32:50 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

Compressor stations, like these, can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Marilyn Anderson
140 Rainbow Ridge Road
Faber VA, 22938-2333

Archived: Monday, March 8, 2021 4:07:03 PM
From: darekjp=vt.edu@mg.gospringboard.io
Sent: Saturday, March 6, 2021 1:23:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Darek Powell
1240 Hawkins Mill Rd
Lynchburg VA, 24503-4953

Archived: Monday, March 8, 2021 4:07:03 PM

From: runesong=outlook.com@mg.gospringboard.io

Sent: Saturday, March 6, 2021 2:08:44 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Ruth Steenwyk
238 Waugh's Ferry Rd.
Amherst VA, 24521-3243

Archived: Monday, March 8, 2021 4:42:50 PM

From: [RUSS HOPLER](#)

Sent: Sunday, March 7, 2021 9:18:09 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Low

Ms Walthall,

I am a resident of Virginia who appreciates experiencing nature and people from all parts of Virginia. The Mountain Valley Pipeline is likely to cause harm to all parts of Virginia in many way, but the Lambert Compressor station is an immediate concern that will have more consequences and harm than DEQ has considered. Please require a public hearing before the full Air Pollution Control Board to review the health and environmental risks associated with Compressor station.

DEQ should consider the combined impacts and existing levels of air pollution when evaluating the suitability of the proposed location for the Lambert Compressor Station. When considering other compressors in the area, combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants. There were several other hazardous air pollutants listed during the Environmental Impact Statement process including benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit. MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

The MVP is a dead-end project that will either not succeed in business or will succeed in causing much death from pollution and community destruction. We need to stop putting so many cycles into investing in any further expansion of MVP or Compressors associated with it. VA DEQ should deny Permit No. 21652 for the Lambert Compressor Station, but at least demand have a permit hearing in front of the full Air Pollution Control Board.

Sincerely

James Russell Hopler

13112 Pelfrey Lane

Fairfax VA 22033

703-508-6528

Archived: Monday, March 8, 2021 4:42:50 PM
From: dguillaudeu=comcast.net@mg.gospringboard.io
Sent: Sunday, March 7, 2021 8:54:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

David Guillaudeu
45174 Gayton Terrace Apt 203
Ashburn VA, 20147-2652

Archived: Monday, March 8, 2021 4:42:51 PM
From: nancy_tingen@hotmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 6:31:40 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Nancy TINGEN
14543 Braniff Circle
Chantilly VA, 20151-3903

Archived: Monday, March 8, 2021 4:42:51 PM
From: steven_tingen@hotmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 6:30:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Steve TINGEN
14543 Braniff Circle
Chantilly VA, 20151-3903

Archived: Monday, March 8, 2021 4:42:51 PM
From: jeanwash843@gmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 5:09:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jean Washburn
843 Fair Port Circle
Glen Allen VA, 23060-7263

Archived: Monday, March 8, 2021 4:42:51 PM

From: Amelia

Sent: Sunday, March 7, 2021 4:52:42 PM

To: anita.walthall@deq.virginia.gov

Subject: Public Hearing Before Full Board for MVP Lambert Compressor Station Draft Air Permit

Importance: Normal

Attachments:

[Lambert Compressor Station.pdf](#);

Dear Ms. Walthall:

I am writing today to request a public hearing before the full Virginia Air Pollution Control Board for the MVP Lambert Compressor Station Draft Air Permit

As a professional medical writer, ecopoet, and artist, I have become increasingly concerned about health and environmental justice issues and regulatory/procedural issues surrounding regional fracked gas pipelines in the Appalachians of Central Virginia. First in my own backyard with the now-cancelled ACP, and in areas I use for recreation and artistic inspiration in the path of the MVP, I have become aware that air pollution is a grave concern around compressor stations and that environmental justice concerns must be assessed with great precision and care.

Because the proposed Lambert Compressor Station would be near the 2 existing Transco compressor stations, it is critical that DEQ consider the cumulative impacts and existing levels of air pollution.

The current draft permit only poses hourly and yearly emission limits on formaldehyde. Yet the combined output of all 3 stations would result in the equivalent of a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and other potentially hazardous air pollutants (HAPs). The EIS listed benzene, toluene, and xylenes, all of which have serious health impacts, but these are not mentioned in the draft permit. The nearby community's percentage of people older than 64 years is significantly higher than the state and national average. As you are aware, older people are more at risk for the ill effects of particulate matter pollution, including increased rates of cardiorespiratory mortality and hospitalization.

In addition, the draft permit raises serious Environmental Justice concerns. The assessment applied EJScreen by census tract instead of the more accurate census block data. EJScreen has limited accuracy in rural areas because the census tracts are large, which means smaller population clusters and pollution hotspots may be hidden. The EJ consultant hired by MVP identified 4 EJ communities within a 3-5 mile radius of the proposed site. Yet the draft air permit only presents data from a 1-mile radius. This is egregious cherry-picking and box checking. I request that the EJ assessment from the 3-5 mile radius be given consideration and that a complete and accurate assessment of alternative sites with a lower EJ impact be conducted.

I have concerns about appropriate communication with affected communities. The current COVID pandemic means that DEQ has relied on electronic outreach for notification, but this is not appropriate since many of the affected localities do not have consistent internet access. The outreach should have occurred much earlier in the process. An accelerated timeline for review and approval is not in keeping with the types of and timing of outreach outlined in Virginia's 2020 Environmental Justice Act.

Among other legal challenges, the mainline of the MVP is currently unable cross many miles of water bodies and substantial delay is expected while MVP files for an individual permit. Thus there is no need permit or create infrastructure for a project facing serious uncertainty.

Thank you for your consideration of these concerns,

Kind regards,

Amelia L. Williams, PhD

pronouns: she/her

Poetry and Eco-Art | www.wildink.net

Writing and Editing Services | www.inkville.biz

Sent with [ProtonMail](#) Secure Email.

Dear Ms. Walthall:

I am writing today to request a public hearing before the full Air Pollution Control Board for the MVP Lambert Compressor Station Draft Air Permit. As a professional medical writer and activist ecopoet and artist, I have become increasingly concerned about health and environmental justice issues and regulatory/procedural issues surrounding regional fracked gas pipelines in the Appalachians in Central Virginia. First in my own backyard with the now-cancelled ACP and in areas I use for recreation and artistic inspiration in the path of the MVP, I have become aware that air pollution is a grave concern around compressor stations and that environmental justice concerns must be assessed with great precision and care.

Because the proposed Lambert Compressor Station would be near the 2 existing Transco compressor stations, it is critical that DEQ consider the cumulative impacts and existing levels of air pollution.

The current draft permit only poses hourly and yearly emission limits on formaldehyde. Yet the combined output of all 3 stations would result in the equivalent of a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and other potentially hazardous air pollutants (HAPs). The EIS listed benzene, toluene, and xylenes, all of which have serious health impacts, but these are not mentioned in the draft permit. The nearby community's percentage of people older than 64 years is significantly higher than the state and national average. As you are aware, older people are more at risk for the ill effects of particulate matter pollution, including increased rates of cardiorespiratory mortality and hospitalization.

In addition, the draft permit raises serious Environmental Justice concerns. The assessment applied EJScreen by census tract instead of the more accurate census block data. EJScreen has limited accuracy in rural areas because the census tracts are large, which means smaller population clusters and pollution hotspots may be hidden. The EJ consultant hired by MVP identified 4 EJ communities within a 3-5 mile radius of the proposed site. Yet the draft air permit only presents data from a 1-mile radius. This is egregious cherry-picking and box checking. I request that the EJ assessment from the 3-5 mile radius be given consideration and that a complete and accurate assessment of alternative sites with a lower EJ impact be conducted.

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Among other legal challenges, the mainline of the MVP is currently unable cross many miles of water bodies and substantial delay is expected while MVP files for an individual permit. Thus there is no need permit or create infrastructure for a project facing serious uncertainty.

Thank you for your consideration of these concerns,

Kind regards,

Amelia L. Williams, PhD
wildink@protonmail.com

Archived: Monday, March 8, 2021 4:42:51 PM
From: drjpooch=msn.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 4:07:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

Please make good decisions.

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

josh pucci
9300 North Star Dr
Mechanicsville VA, 23116-2822

Archived: Monday, March 8, 2021 4:42:51 PM
From: debrashah@hotmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 3:23:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Debra Shah
1015 Westwood Dr NE
Vienna VA, 22180-3646

Archived: Monday, March 8, 2021 4:42:51 PM
From: anniewparr@gmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 1:49:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Annie Parr
473 Texas School Rd
Wingina VA, 24599-3262

Archived: Monday, March 8, 2021 4:42:51 PM
From: gscottwh@gmu.edu@mg.gospringboard.io
Sent: Sunday, March 7, 2021 12:33:44 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Gail White
4258 Bear Hollow Trl
Haymarket VA, 20169-1709

Archived: Monday, March 8, 2021 4:42:52 PM

From: [Megan Shepherd](#)

Sent: Sunday, March 7, 2021 12:32:13 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Virginia's Department of Environmental Quality,

I support the call for a full public hearing before the full Air Pollution Control Board because the board must hear community members' concerns about air and noise pollution.

My concerns for my fellow Virginians in Pittsylvania County regarding the Lambert compressor station are the following:

- The compressor station will emit air pollution in a community already impacted by Transco compressor stations. The cumulative impact of the Lambert compression station PLUS Transco compressor stations must be considered by your department.
- Formaldehyde cannot be the only emission subject to limits because other pollutants (e.g. benzene, toluene) can have adverse health effects.
- Most importantly, air pollution poses a major threat to public health (e.g. increasing the risk of cardiorespiratory disease and cancer).

I stand with stand POWHR Coalition, Appalachian Voices, Chesapeake Climate Action Network, ARTivismVirginia, Haw River Assembly, Sierra Club Virginia Chapter and Pittsylvania NAACP regarding their concerns with the Lambert compression station.

Megan Shepherd

245 Gibson Dr, Christiansburg, VA 24073

540-239-9136

Volunteer & Donor, Virginia Organizing NRV Chapter

Archived: Monday, March 8, 2021 4:42:52 PM
From: irwin.flashman@gmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 11:44:43 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Irwin Flashman
1327 Buttermilk Ln.
Reston VA, 20190-3905

Archived: Monday, March 8, 2021 4:42:52 PM
From: jessica36ae@gmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 9:59:43 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jessica Henao
308 Lancaster gate dr apt 104
Midlothian VA, 23113-6892

Archived: Monday, March 8, 2021 4:42:52 PM
From: pamjahm@hotmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 8:16:50 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Pamela Mullins
7033 Deer Stand Dr.
Gloucester VA, 23061-2824

Archived: Monday, March 8, 2021 4:42:52 PM
From: redwood=crosslink.net@mg.gospringboard.io
Sent: Sunday, March 7, 2021 3:05:41 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Ron Edwards
4100 Lily Pond rd
Center Cross VA, 22437-2126

Archived: Monday, March 8, 2021 4:42:52 PM
From: nedsavage@gmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 3:03:50 AM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Edward Savage
8094 Upper Craig Creek Rd.
Catawba VA, 24070-5733

Archived: Monday, March 8, 2021 4:42:52 PM
From: maxemerson001@gmail.com @mg.gospringboard.io
Sent: Sunday, March 7, 2021 3:00:44 AM
To: [Anita Walthall](#)
Subject: Vote "no" on anti-trans SB 354
Importance: Normal

Dear Ms. Walthall

I'm writing to respectfully ask that you vote "no" on Senate Bill 354 and all other proposals that would perpetuate and enable discrimination against LGBTQ Arkansans.

Senate Bill 354 would deny trans students the right to play sports consistent with who they are, and it won't make sports fairer for women.

This bill is part of a coordinated attack against transgender student-athletes across the country. It's pure discrimination and would erase and exclude transgender youth.

Other bills would prohibit doctors from providing medically necessary health care for transgender teenagers, allow wide-ranging refusals of health care for almost any reason, and allow people to use religion as an excuse to discriminate.

These are not the common-sense, compassionate solutions we need to move Arkansas forward.

Please vote to oppose these harmful and discriminatory measures. Thank you for your public service and your attention to this important matter.

Sincerely,

Max Emerson

Archived: Monday, March 8, 2021 4:42:52 PM
From: laraakdol@gmail.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 1:43:47 AM
To: [Anita Walthall](#)
Subject: Vote "no" on anti-trans SB 354
Importance: Normal

Dear Ms. Walthall

I'm writing to respectfully ask that you vote "no" on Senate Bill 354 and all other proposals that would perpetuate and enable discrimination against LGBTQ Arkansans.

Senate Bill 354 would deny trans students the right to play sports consistent with who they are, and it won't make sports fairer for women.

This bill is part of a coordinated attack against transgender student-athletes across the country. It's pure discrimination and would erase and exclude transgender youth.

Other bills would prohibit doctors from providing medically necessary health care for transgender teenagers, allow wide-ranging refusals of health care for almost any reason, and allow people to use religion as an excuse to discriminate.

These are not the common-sense, compassionate solutions we need to move Arkansas forward.

Please vote to oppose these harmful and discriminatory measures. Thank you for your public service and your attention to this important matter.

Sincerely,

Lara Akdol

Archived: Monday, March 8, 2021 4:42:52 PM
From: courtney=trueselftherapy.com@mg.gospringboard.io
Sent: Sunday, March 7, 2021 12:25:40 AM
To: [Anita Walthall](#)
Subject: Vote "no" on anti-trans SB 354
Importance: Normal

Dear Ms. Walthall

I'm writing to respectfully ask that you vote "no" on Senate Bill 354 and all other proposals that would perpetuate and enable discrimination against LGBTQ Arkansans.

Senate Bill 354 would deny trans students the right to play sports consistent with who they are, and it won't make sports fairer for women.

This bill is part of a coordinated attack against transgender student-athletes across the country. It's pure discrimination and would erase and exclude transgender youth.

Other bills would prohibit doctors from providing medically necessary health care for transgender teenagers, allow wide-ranging refusals of health care for almost any reason, and allow people to use religion as an excuse to discriminate.

These are not the common-sense, compassionate solutions we need to move Arkansas forward.

Please vote to oppose these harmful and discriminatory measures. Thank you for your public service and your attention to this important matter.

Sincerely,

Courtney Frierson

Archived: Monday, March 8, 2021 4:42:52 PM
From: portanne=cox.net@mg.gospringboard.io
Sent: Sunday, March 7, 2021 12:27:43 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Agnes Hetzel
1 The Palisades
Williamsburg VA, 23185-8611

Archived: Tuesday, March 9, 2021 8:49:14 AM

From: [Hanuman](#)

Sent: Monday, March 8, 2021 7:20:56 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

I'm asking for a full hearing in front of the Virginia Air Pollution Control Board.

As a neighbor to the Union Hill Community in Buckingham County, I'm quite familiar with the threat of compressor stations' air pollution to EJ communities.

Four EJ communities were identified within a 3-5 mile radius of the proposed Lambert compressor station site. MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius only, even though the consultant's report on MVP accepted screening within a 3-mile radius.

Factoring in the emission levels of hazardous air pollutants generated by the two Transco compressor stations, the cumulative impact from those and the proposed Lambert facility would be more than 25 tons per year and would require a Clean Air Act Title V major source air pollution permit. MVP assumed this location would be acceptable because they could blend their emissions in with the existing compressor stations. However, the Lambert facility would put the nearby community over the limit in terms of risk of adverse health effects.

Thank you for your attention to this issue.

Kenda Hanuman
247 Ramaa Lane
Buckingham, VA 23921
434-969-1586

Archived: Tuesday, March 9, 2021 8:49:14 AM
From: omni_girl@hotmail.com@mg.gospringboard.io
Sent: Monday, March 8, 2021 7:14:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

C. Kasey
9317 Guenevere Pl.
Mechanicsville VA, 23116-2781

Archived: Tuesday, March 9, 2021 8:49:14 AM
From: jstark25=cox.net@mg.gospringboard.io
Sent: Monday, March 8, 2021 9:15:55 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Kathy Stark
524 Pennsylvania Ave
Norfolk VA, 23508-2835

Archived: Tuesday, March 9, 2021 8:49:15 AM

From: npfeiffer=franciscanaction.org@mg.gospringboard.io

Sent: Monday, March 8, 2021 9:54:44 AM

To: Anita Walthall

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Nora Pfeiffer
2641 Waldo Lane
Henrico VA, 23228-5148

Archived: Tuesday, March 9, 2021 8:49:15 AM
From: wemskm=live.com@mg.gospringboard.io
Sent: Monday, March 8, 2021 10:45:44 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Walter Moore
6107 Red Setter Ln
Moseley VA, 23120-2261

Archived: Tuesday, March 9, 2021 8:49:15 AM
From: rdtgjohnson@hotmail.com@mg.gospringboard.io
Sent: Monday, March 8, 2021 2:45:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Rhonda Johnson
240 Rainwater Drive
Aylett VA, 23009-3320

Archived: Tuesday, March 9, 2021 8:49:15 AM
From: routree6=cox.net@mg.gospringboard.io
Sent: Monday, March 8, 2021 2:59:50 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Janet Rountree
3305 Melrose Ct
Suffolk VA, 23434-7280

Archived: Tuesday, March 9, 2021 8:49:15 AM
From: riostc@gmail.com@mg.gospringboard.io
Sent: Monday, March 8, 2021 3:33:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Teresa McCartney
10203 Purcell Rd
Glen Allen VA, 23060-3722

Archived: Tuesday, March 9, 2021 8:49:15 AM

From: [Becky Robinson](#)

Sent: Monday, March 8, 2021 4:14:02 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

I am writing to request a full hearing in front of the Virginia Air Pollution Control Board. I am a concerned citizen in Raleigh, NC seeking to amplify the voices of my neighbors in impacted communities. I just got off of a Zoom call with a couple who own a farm in the area and could speak directly to the impacts of the two Transco compressor stations that are already in the area. They stated that they could smell the foul air. This is likely due to the formaldehyde in the air, which can increase complications of existing COPD and asthma and lead to tumor formation and pulmonary edema. MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166. Other toxins these compressors emit include benzene, toluene and xylenes that can cause adverse health effects but are not listed in this air permit. This is an environmental justice concern as these stations are located in majority minority communities with high populations of elderly residents. In addition to impacting residents' health, polluting an area results in a decline in property values. Many of the farms in the area have been in families for generations. It is not fair to attack these families' generational wealth in this way. The environmental justice review completed thus far seems to have been largely ineffective and was treated as a box checking exercise. On top of this, outreach to impacted communities has been impacted by COVID-19 and lack of reliable internet access in these areas. For these reasons, I believe the Virginia Air Pollution Control Board should conduct a more extensive review of the air quality impacts of this compressor station with an emphasis placed on environmental justice.

Thank you for your time,
Becky Robinson
8004 Elderson Ln
Raleigh, NC 27612
805-674-0319

Archived: Tuesday, March 9, 2021 8:49:16 AM
From: [Jessica Alley](#)
Sent: Monday, March 8, 2021 4:49:36 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

I am writing to formally request a full hearing before the Virginia Air Pollution Control Board regarding the Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit. There are multiple reasons for this request.

First, I have concerns regarding the cumulative impact of compressor stations in the region. Specifically, if the compressor station were to be built near the existing Transco compressor stations, the emissions from these facilities would release levels of carbon monoxide, nitrogen oxides, volatile organic compounds, and potentially hazardous air pollutants equivalent to a Clean Air Act Title V air polluting facility. Additionally, there is a lack of information regarding hazardous air pollutants. Although several hazardous air pollutants that can cause adverse health effects were listed during the Environmental Impact Statement process, including benzene, toluene, and xylenes, these pollutants are not listed in this air permit. This is extremely hazardous to the health of the nearby community as the cumulative impact of this station combined with the Transco compressor stations would result in more than 25 tons of hazardous air pollutants per year. As previously mentioned, this would require a Clean Air Act Title V major air pollution permit. Third, there are major health concerns surrounding the building of this station in the proposed location. Formaldehyde, the only hazardous air pollutant that is subject to hourly and yearly emission limits in the draft, can irritate skin and mucus membranes, leading to breathing problems and complications from pre-existing conditions such as asthma and COPD. The proposed Lambert Compressor Station would emit nearly 9 pounds of formaldehyde an hour, on top of the 19 tons per year emitted by the Transco stations, and increase the emissions of particulate matter in the region by nearly 30%. Given that the percentage of older adults in the nearby community is significantly higher than the state and national average and that this population is more vulnerable to particulate matter pollution, construction of this station as proposed would be expected to have dramatic adverse health consequences on the nearby community. There are also environmental justice concerns, with major discrepancies between the information provided in this permit application and information provided by MVP's consultant in the Environmental Justice Report. Without holding MVP to account for these discrepancies, the review process fails and environmental justice is not upheld. It is also unclear if there was a complete and accurate assessment of alternative sites with a lower environmental justice impact and whether or not the proposed location can be justified as the "best" option. Additionally, cleaner technologies seem to have been eliminated without being given full consideration, particularly regarding the proposed use of electric turbines. Finally, there are substantial concerns related to the procedural process, including lack of timely outreach to the communities that will be impacted, completion rates of the mainline MVP project that were significantly overstated in the draft permit (and are likely to be further delayed given the mainline's current inability to complete numerous water crossings), and the reliance of this process on old census data instead of waiting to use the most up-to-date information, which was released last month. Numerous legal challenges are faced by the MVP and a report released March 8 by the Institute for Energy Economics and Financial Analysis (IEEFA) concludes that the pipeline is in financial jeopardy because of this as well as reduced demand projections. The reasons to doubt the pipeline's financial viability include revised forecasts that now predict lower natural gas demand than when the project was first proposed, the likely cancellation of the Southgate Extension, a spur meant to funnel gas from the Mountain Valley project to North Carolina, competition with cheaper sources of natural gas, construction costs that have soared 60% above original estimates, and predictions of liquified natural gas exports to Asia and the Pacific that now estimate lower profits than originally anticipated. With the mainline of the MVP project nowhere near completion and given the aforementioned concerns, it does not make sense to approve a permit or create further infrastructure for a project that faces such a large degree of uncertainty and will negatively impact the air quality and health of nearby citizens. I urge you to take these public comments into account and send this permit for a full hearing to the Virginia Air Pollution Control Board in order to address the many concerns surrounding this project.

My contact information is as follows:

Jessica Alley
374 Cedar Rush Road
New Castle, VA 24127
540-309-5584

Archived: Wednesday, March 10, 2021 9:33:45 AM

From: jeghee@everyactioncustom.com

Sent: Tuesday, March 9, 2021 2:05:37 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Dr. James Ghee

PO Box 345 Farmville, VA 23901-0345

jeghee@embarqmail.com

Archived: Wednesday, March 10, 2021 9:33:45 AM

From: [Cynthia Munley](#)

Sent: Tuesday, March 9, 2021 1:58:33 PM

To: anita.walthall@deq.virginia.gov

Subject: Comments about Lambert Compressor Station from Cynthia Munley

Importance: Normal

Name: Cynthia Munley
425 Roanoke Boulevard
Salem, VA 24153
540 389 8915

1. A full hearing in front of the Virginia Air Pollution Control Board is needed because of the severe consequences of adding another compressor station in this location.
2. This matters to me because everything is wrong concerning any permitting for the MVP's proposed compressor station in Pittsylvania County. The project makes no sense on every level. It is even a loss for the companies funding it and it is likely to be uncompleted and unsuccessful. I wish that no additional environmental damage be incurred for this failure of a project. Permitting a compressor station when MVP is likely to be a failed project and pipeline-to-nowhere would further expose the irresponsibility of the state of Virginia for wrongly permitting MVP at every juncture. MVP is being challenged with seven legal suits and recently failed to get a needed variance from FERC, which with a new FERK Chairman who sees MVP as an overbuilt, unnecessary pipeline, will likely further delay and impede this project. MVP does not have a viable way to cross water bodies. Using individual permits, it is likely to be challenged at every turn because the 42-inch mammoth pipeline has no way to cross water bodies without violating the Clean Water Act.

Comments:

Cumulative impacts make the suitability of the proposed location for the Lambert Compressor Station. If built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and hazardous air pollutants.

Health concerns:

- Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema.
- MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166.
- The proposed Lambert station would increase the emissions of particulate matter in the area by almost 30%.
- The percentage of people over the age of 64 in the nearby community is significantly higher than the state and national average. Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization.
- Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia.
- In the Environmental Impact Statement, MVP projected that the Lambert compressor station would emit over 69 pounds of benzene annually. Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

Noise:

- The noise pollution resulting from 208 weekly startups and shutdowns for both the station's turbines would create unacceptable levels of air pollution emissions and significant noise impacts.

Environmental Justice concerns:

Genuine and accurate information discrepancies exist between the information provided by MVP and the EJ Analysis Report and

what was communicated in MVP's final permit application. If this is the end of the review process, it is altogether likely that the EJ issues will be challenged in court. Although four EJ communities were identified within a 3-5 mile radius of the proposed compressor station site, MVP's September 2020 revised permit application to DEQ used data from a 1-mile radius. MVP's information was cherry-picked and will be challenged. Best to stop this permit here.

Procedural concerns:

Although DEQ's notification processes rely on electronic outreach, the impacted localities do not have consistent internet access. The outreach timeline should have been earlier and conformed to Virginia's 2020 Environmental Justice Act.

During the public information session on Jan 7, 2021 regarding the timeline for approval, it was noted that a Clean Water Act 401 water certification from North Carolina is missing and DEQ staff acknowledged that they possibly should *NOT* be moving forward.

The completion rates for construction of the mainline MVP project that the developer included in the draft permit are significantly overstated, and could unfairly influence decision makers reviewing the permit. The most difficult and contested portions of the MVP have yet to be constructed making MVP's claim of 92% completion highly questionable. MVP does not use "full to restoration" percentage complete, instead relying on any preconstruction or ground-disturbing activity to inflate numbers. With the Mainline nowhere near completed, there is no need to permit or create infrastructure for a project with such uncertainty. Wait for new census data with the most up to date information. It is not necessary to permit the MVP Lambert Compressor Station at this time.

Archived: Wednesday, March 10, 2021 9:33:46 AM

From: hazzardfamily@everyactioncustom.com

Sent: Tuesday, March 9, 2021 1:58:00 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

Please deny this permit and allow review by the Air Pollution Control Board. Thank you!

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Diane Hazzard

3006 John Marshall Dr Arlington, VA 22207-1340

hazzardfamily@gmail.com

Archived: Wednesday, March 10, 2021 9:33:46 AM

From: debracope@everyactioncustom.com

Sent: Tuesday, March 9, 2021 1:36:11 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms Debra Copeland COPELAND

6495 Frederick Ct Warrenton, VA 20187-4454

debracope@comcast.net

Archived: Wednesday, March 10, 2021 9:33:46 AM

From: beckydaiss@everyactioncustom.com

Sent: Tuesday, March 9, 2021 1:28:38 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Becky Daiss

1276 N Wayne St Apt 1128 Arlington, VA 22201-5859

beckydaiss@verizon.net

Archived: Wednesday, March 10, 2021 9:33:46 AM

From: barbar4032@everyactioncustom.com

Sent: Tuesday, March 9, 2021 1:16:16 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. Barbara Coleman-Brown

4002 Allens Mill Rd Scottsburg, VA 24589-3181

barbar4032@yahoo.com

Archived: Wednesday, March 10, 2021 9:33:46 AM

From: olekack@everyactioncustom.com

Sent: Tuesday, March 9, 2021 1:07:26 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Rev. Katherine Carpenter

220 Huntington Ln Blacksburg, VA 24060-3874

olekack@gmail.com

Archived: Wednesday, March 10, 2021 9:33:47 AM

From: juliet@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:49:59 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Juliet Hiznay

2200 Columbia Pike Apt 806 Arlington, VA 22204-4419

juliet@jdhiznay.com

Archived: Wednesday, March 10, 2021 9:33:47 AM

From: dlove@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:44:30 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr. DaQuan Love

300 Natchez Rd Richmond, VA 23223-3352

dlove@naacpva.org

Archived: Wednesday, March 10, 2021 9:33:47 AM

From: Fluffygran1@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:42:13 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. Shirley Akers

515 Depot St NE Christiansburg, VA 24073-2013

Fluffygran1@verizon.net

Archived: Wednesday, March 10, 2021 9:33:47 AM
From: uwe007@hotmail.com@mg.gospringboard.io
Sent: Tuesday, March 9, 2021 6:54:52 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Uwe Dotzauer
4627 Seminary Rd Apt 201
Alexandria VA, 22304-1447

Archived: Wednesday, March 10, 2021 9:33:47 AM
From: susanfashionpolice@gmail.com@mg.gospringboard.io
Sent: Tuesday, March 9, 2021 7:16:46 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Susan Boyd
406 W Glebe Rd
Alexandria VA, 22305-2307

Archived: Wednesday, March 10, 2021 9:33:47 AM

From: [Stacy Lovelace](#)

Sent: Tuesday, March 9, 2021 8:14:40 AM

To: david.paylor@deq.virginia.gov; Melanie.davenport@deq.virginia.gov; michael.dowd@deq.virginia.gov; Citizen Boards, rr

Cc: anita.walthall@deq.virginia.gov; Mercer, Clark; matt.strickler@governor.virginia.gov

Subject: Letter to DEQ, Water Board, and Air Board re: new MVP permits

Importance: Normal

Attachments:

[Letter re_ new MVP permits - March 9, 2021.pdf](#);

To: David Paylor, Director of the Department of Environmental Quality;

Melanie Davenport, Water Permitting Division Director;

Mike Dowd, Air & Renewable Energy Division Director;

Members of the State Water Control Board; and

Members of the Air Pollution Control Board

cc: Anita Walthall, DEQ Blue Ridge Office; Governor Ralph Northam; Secretary of Natural Resources Matt Strickler

Please find the attached letter, signed by nearly 100 organizations and hundreds more individuals urging that new permits for the Mountain Valley Pipeline and its Southgate extension be denied. You can reach me at johnsonsc3@gmail.com or 804-986-9888 with any questions or responses.

Sincerely,

Stacy Lovelace

Letter re_ new MVP permits - March 9, 2021.pdf

March 9, 2021

**David Paylor, Director of the Department of Environmental Quality;
Melanie Davenport, Water Permitting Division Director;
Mike Dowd, Air & Renewable Energy Division Director;
Members of the State Water Control Board; and
Members of the Air Pollution Control Board
% Department of Environmental Quality
1111 East Main St., Suite 1400
Richmond, VA 23219**

cc: Anita Walthall, DEQ Blue Ridge Office; Governor Ralph Northam; Secretary of Natural Resources Matt Strickler

Re: New permits for the Mountain Valley Pipeline and Southgate extension

Dear Mr. Paylor; Ms. Davenport; Mr. Dowd; Members of the State Water Control Board; and Members of the Air Pollution Control Board,

We, the undersigned organizations and individuals, write to urge you to reject any new permits requested by Mountain Valley Pipeline (MVP). Virginia has suffered through three years of MVP's inadequate erosion and sedimentation control practices, which have created horrific, long-lasting sedimentation, streambank collapse, and the loss of species, forest and waters. These are losses from which farmers and communities may never recover.

Over two years after a so-called "enforcement" suit and deal that actually allowed MVP to cover itself via excuses like 'act of god' and 'flood,' and resulted in a mere two million in fines for a six billion dollar project, MVP's inevitable harms continue.

Under criminal investigation and the subject of continued state complaints and fines, MVP has solidly proven it cannot build its pipeline safely through the mountainous terrain and karst geography through which it is routed. This point is echoed at the federal level where the joint venture LLC is bogged down in litigation over the inadequacy of several agency permits, including U.S. Fish and Wildlife Service, the U.S. Forest Service, and the U.S. Bureau of Land Management. Owing to vacated federal permits, MVP has recently abandoned its original plan to use the general Nationwide Permit 12 from the U.S. Army Corps of Engineers to cross waterbodies, and has indicated its pursuit of individual permits for the hundreds of stream and wetland crossings the pipeline intends to make.

The Virginia Department of Environmental Quality (DEQ) is aware, via the January 26 letter MVP sent to the Department regarding Water Permit Certification Pre-Filing Meeting Request, that MVP intends to submit new applications for crossing waterbodies in Virginia. In a letter to the Federal Energy

Regulatory Commission, also dated January 26, MVP claims DEQ and the State Water Control Board's involvement in the process for these new permits "should be minimized" because MVP submitted a permit application years ago--- indicating the company intends to rely heavily on its original permit application which has, repeatedly since 2017, been predicted and proven to be inadequate.

The minimal fines imposed by Virginia for violations, and the hundreds of complaints that DEQ has ignored, have resulted in DEQ allowing a long and appalling track record of unspeakable harms to the Commonwealth, making it no surprise that MVP intends to rely on its first state permit application. Given its clear absence of intent to change trajectory from its original plans, the only reasonable decision by the Department and Board must be to reject MVP's new permits for the pipeline. MVP is years behind schedule, billions over budget, is proven immitigable, and has caused immense harm to Virginians' water and lives.

Alarming concerns pointed out by a wealth of experts and impacted community members for years before the pipeline's original permit was granted by the Water Board, at the behest of DEQ, have come to fruition. State regulatory agencies have wasted Virginians' tax revenues for years, attempting to regulate a project that has proven itself time and again to be unregulatable - a project that should have been rejected to begin with and has been proven unneeded by years of flat energy load demand in Virginia.

DEQ and the State Water Control Board have the absolute authority to prevent these harms from continuing. In order to fulfill the Department's and Board's obligation to conserve and protect Virginia's waterways, DEQ and the Board can only reject any new permit applications for Mountain Valley, or any request from MVP for new permits.

Especially in light of the above, we further request that DEQ and the Air Pollution Control Board reject the air permit for MVP's Lambert Compressor Station. Approving a permit for this station, proposed to push gas into North Carolina via MVP's proposed Southgate extension, would perpetuate environmental injustice and be an insult to injury in the face of all the dangers and lack of need already proven for MVP's mainline. North Carolina's Department of Environmental Quality rejected state water permits for MVP's Southgate extension, acknowledging that it defies logic to issue permits for an MVP extension when the status of MVP's mainline is so troubled. Virginia DEQ and state regulatory authorities should acknowledge the same and reject any permits relating to MVP Southgate and its Lambert Compressor station.

Sincerely,

350 Alexandria
350 Loudoun
350 Triangle
350 Fairfax
Activate Virginia
Alliance to Protect the People and Places We Live (APPPL)
AMP Creeks Council
ARTivism Virginia

Berks Gas Truth
Beyond Extreme Energy
Bold Alliance
Breathe Easy Susquehanna County
Center for Sustainable Communities
Chesapeake Climate Action Network
Citizen Voices Radio Show
Citizens Climate Lobby - Pottsville
Citizens For Arsenal Accountability
Climate & Clean Energy Working Group, Virginia Grassroots Coalition
Climate Action Alliance of the Valley
Climate Disobedience Center
CommUNITY ARTS-reach
Creative Ceremonies & Beautiful Elopements
Earthfolk
EnoughisEnough, PreserveVA
Environmental Committee of 50 Ways Rockbridge
Extinction Rebellion Richmond
Fairfax Green Party
Fairfax Young Democrats
Faith Alliance for Climate Solutions
Falls of the James Group, Sierra Club
Food & Water Watch
Fossil Free Fredericksburg (FFF)
Friends of Buckingham
Gas Free Seneca
Goose Creek Gardens LLC
Greater Prince William Climate Action Network
Green New Deal Virginia
Hampton Roads Green Party
Hampton Roads Poor Peoples Campaign
Howl'n Dog Designs
Independent Green Party of Virginia
Indian Point Safe Energy Coalition
Lewinsville Faith in Action
Loudoun Climate Project
Moral Monday On D.O.G. Street
Mothers Out Front Virginia
Mountain Lakes Preservation Alliance
National Parks Conservation Association
New River Valley Green Party
New River Valley Group, Virginia Sierra Club
Norfolk Catholic Worker
NRV Land Air Water Watch
Oil Change International

Our Revolution - Falls Church
Peace Pentagon
Peninsula indivisible
Physicians for Social Responsibility, Pennsylvania
Preserve Floyd
Preserve Giles County
Preserve Montgomery County VA
Preserve Rockbridge
Preserve Salem
Property Rights and Pipeline Center
Protect Our Water Heritage Rights - POWHR
Richmond For All
Richmond Indigenous Society
Richmond Interfaith Climate Justice League
River Guardian Foundation
Roanoke Group, Sierra Club
Savage Acres, LLC
Schuylkill Pipeline Awareness
Silver Lining Farm
Southwest Virginia Poor People's Campaign
Sullivan Alliance for Sustainable Development
Sustainable Roanoke
The Ecological Justice Initiative
The Virginia Youth Climate Cooperative
Tidewater DSA
Tidewater Peoples Party
Union Hill Freedmen Family Research Group
United For Clean Energy
United Parents Against Lead & Other Environmental Hazards (UPAL)
VA Network for Democracy and Environmental Rights (VNDER)
Virginia Association for Biological Farming
Virginia Community Rights Network
Virginia Environmental Justice Collaborative
Virginia Interfaith Power & Light
Virginia Justice Democrats
Virginia Pipeline Resisters
Virginia Poor People's Campaign
Virginia River Healers
Virginia Student Environmental Coalition
Virginians Against Pipelines
We of Action, Indivisible
Williamsburg Sunrise Movement Hub
Yoga For Peace, Justice, Harmony With the Planet
Youth Climate Action Team Inc.

Adamm Rhea - Charlottesville, VA
Adele Roland - Fairfax, VA
Ahmad Karram - Annandale, VA
Aileen Rivera - Henrico, VA
Alden Hostetter - Harrisonburg, VA
Alden Hostetter - Harrisonburg, VA
Alex Gordon - Richmond, VA
Alison Mallonee - Richmond, VA
Alison Symons - Fairfax County, VA
Aliya Farooq - Chester, VA
Amanda Fogler - Fairfax, VA
Amanda Polson - Charlottesville, VA
Amanda R Bozack - Salem, VA
Amber Hendrix - Chatham, VA
Amelia Williams, Phd - Nelson County, VA
Amory Fischer - Richmond, VA
Amy Harlib - New York, NY
Amy Harlib - New York, NY
Amy Schertz - Williamsburg, VA
Ana Anderson - Roanoke, VA
Andrew Hamilton - Fairfax County, VA
Andrew Hinz - Baltimore, MD
Ann Goette - Giles County, VA
Anna Benson - Blacksburg, VA
Anne Bernard - Boones Mill, VA
Anne Lusby-Denham - Roanoke, VA
Annie Beckerman - Richmond, VA
April Mccarthy - Stafford, VA
Aaron - Richmond, VA
Ashlyn Davis - Richmond, VA
Audrey Williams - Chatham, NC
Ayman Eldarwish - Falls Church, Fairfax Va, VA
Barbara Adams - Richmond, VA
Barbara Daniels - Richwood, WV
Barbara Earp - Henrico, Va
Barbara Gehrung - Charlottesville, VA
Barbara George - Alexandria, VA
Barbara J.Wierwille - Montgomery, VA
Barbara Pryor - Amherst, VA
Barry O'Keefe - Richmond, VA
Benjamin Cunningham - Charlottesville, VA
Bernadette Bj Lark - Roanoke, VA
Beth Garst - Franklin County, VA
Beth Kreydatus - Henrico, VA
Betty Werner - Floyd, VA

Beverly B. Fleming - Montgomery County, VA
Bill Halsey - Faber, VA
Bill Lankford - Charlottesville, VA
Blaizen Bloom - Chesapeake, VA
Blythe Merritt - Fairfax, VA
Bobby Whitescarver - Augusta, VA
Bonnie J. Smith - Montgomery, VA
Brandon Carter - Petersburg, VA
Brandon Carver - Christiansburg, VA
Brian Kelley - Floyd, VA
Bridget Kelley-Dearing - Lexington, VA
Brigitte Rotche - Blacksburg, VA
Brionna Nomi - Richmond, VA
Bruce Agnew - Salem, VA
Bruce Coffey - Bent Mountain, VA
Candace Graham - Midlothian, VA
Candace Hudert - Henrico, VA
Carey Chet Campbell - Springfield, VA
Carmen Todd - Bristow, VA
Carol A. Johanningsmeier - Suffolk, VA
Carol Marton - Giles, VA
Carol Snell-Feikema - Harrisonburg, VA
Caroline Kirk - Williamsburg, VA
Caroline Moore - Roanoke County, VA
Carolyn Haupt - Alexandria, VA
Catherine Hunt - Monroe, NJ
Catherine Murphy - Martinsville, VA
Catherine Rumschlag - Abingdon, VA
Chad Oba - Buckingham, VA
Chelsea Muth - Richmond, VA
Chris Jessee - Charlottesville, VA
Christiane Riederer - Ashland, VA
Christina Ohlrogge - Norfolk, VA
Christine Maccabee - , MD
Cinthia Honeycutt - Salem, VA
Clare Law - Blacksburg, VA
Cliff Shaffer - Newport, VA
Coles Terry - Bent Mountain, VA
Collin Rees - Washington, DC
Connie Fitzsimmons - Blacksburg, Montgomery County, VA
Crystal Stallard - Shipman/ Nelson, VA
Cynthia Cuellar - Fairfax, VA
Cynthia Munley - Salem, VA
Cynthia Rea - Herndon, VA
Dan Crawford - Roanoke, VA

Daniel Hulburt - Santa Barbara, CA
David Bernard - Bay County, FL
David G. Yolton - Giles, VA
David Kuebrich - Fairfax, VA
David McNair - Montgomery, VA
David Seriff - Blacksburg, VA
David Sutton - Roanoke, VA
David Ward - Lovettsville, VA
Dayna Sowd - Herndon, VA
Debbie - Richmond, VA
Deborah Freeman - Roanoke, VA
Deborah Kushner - Staunton, VA
Deedee Tostanoski - Alexandria, VA
Delores Craig - Wythe County, VA
Denis Orsinger - Vienna, VA
Denise Robbins - Arlington, VA
Denver Supinger - Fairfax County, VA
Deron Lark - Roanoke, VA
Desiree Shelley - Catawba, VA
Diana Gooding - Lewis, WV
Diana T Artemis - Fairfax, VA
Diane Bloom - Albemarle, VA
Dianna Richardson - Blacksburg, VA
Dinah Wiley - Alexandria, VA
Donald - Salem, VA
Donelle Sawyer - Fairfax County, VA
Donna Pitt - Giles, VA
Donna Shambley - Burlington, NC
Donna Shaunesey - Charlottesville, VA
Doug Pruett - Roanoke, VA
Dr. Randel Dymond, Pe - Blacksburg, VA
Dr. William Ferguson - Denver, CO
Edward Savage - Craig County, VA
Elaine Fischer - Roanoke, VA
Eleanor Amidon - Afton, VA
Elena Day - Charlottesville, VA
Elena Zweerink - Richmond, VA
Elizabeth C. Fine - Blacksburg, VA
Elizabeth Ende - Fairfax, VA
Elizabeth Fogarty - Arlington, VA
Elizabeth Struthers Malbon - Blacksburg, VA
Elizabeth Terry Reynolds - Salem, VA
Elizabeth Thomas - Montgomery County, VA
Elle De La Cancela - Richmond, VA
Ellen Darden - Montgomery, VA

Ellen Holtman - Salem, VA
Emily Knight - Chesterfield, VA
Eric Wickenheiser - Richmond, VA
Erin Della Puca - Stafford, VA
Ezekiel Atwell - Charlottesville, VA
Faith B Harris - Henrico, VA
Felicia Etzkorn - Blacksburg, VA
Fran Reese - Richmond, VA
Francesca Costantino - Richmond, VA
Frank Gropen - Stuart, VA
Frank Ronnau Iii - Powhatan, VA
Franzcanon - Albemarle County, VA
Gail Heaton - Richmond, VA
Garry Harris - Fulton, VA
Genesis Chapman - Richmond, VA
George Glasson - Montgomery, VA
George Marché - Spotsylvania, VA
George Matthis - Raleigh, NC
Georgia Haverty - Pembroke, VA
Georgianne Stinnett - Richmond/Buckingham, VA
Gerald Ronnau - Sterling, VA
Glen G Besa - Chesterfield, VA
Glenn Loveless - Boones Mill, VA
Glenna Tinney - Alexandria, VA
Gloria S Parry - Roanoke, VA
Grace Tuttle - Bath County, VA
Gracie Patten - Williamsburg, VA
Grant E. Holly - Roanoke County, VA
H. J. Kroemer - Blacksburg, VA
Hailey Lauritsen - Fairfax, VA
Hannah Kinder, Candidate Hd-89 - Norfolk, VA
Hannah Van Buskirk - Richmond, VA
Harriet Hirsch - Vienna, VA
Heather Hawley - Brighton, UK
Heather Higgins - Charlottesville, VA
Heather Lutz Lim - Albemarle, VA
Heidi Dhivya Berthoud - Buckingham, VA
Heidi Ketler - Roanoke, VA
Helen Renqvist - Newport, VA
Helene Shore - Vienna, VA
Henry Arrington - Lynchburg, VA
Herb H Beskar - Roanoke, VA
Herbert Fitzell - Chester, VA
Herman R. Mann - Greenville, WV
Hersha Evans - Christiansburg, VA

Hiromi Okumura - Blacksburg, VA
Hyangnan Supernaw - Bedford, VA
Ian - Lancaster, VA
Ian Dayalsingh - Chesterfield, VA
Irene Leech - Elliston, VA
J. Mike Henrietta - Charlottesville, VA
J. Phillip Pickett, DVM - Blacksburg, VA
Jack L Lindenmuth - Charles City, VA
Jacob Hileman - Catawba, VA
Jake Clem - Montgomery, VA
James Crawford - Roanoke City, VA
James D. Harshfield - Roanoke City, VA
James Moore - Richmond, VA
James Russell Hopler - Fairfax, VA
Jammie Hale - Pembroke, VA
Jayn Avery - Floyd, VA
Jean Elliott - Montgomery, VA
Jean L. Porterfield - Giles, VA
Jeanne Stanborough - Albemarle, VA
Jeffrey B. Staples - Chesapeake, VA
Jeffrey C. Jacobs - Herndon, VA
Jeffrey L Marion - Blacksburg, VA
Jennifer Kelly - Albemarle County, VA
Jessica Sims - Richmond, VA
Jill Averitt - Nellysford, VA
Jo Anne St. Clair - Harrisonburg, VA
Joan Chapman - Charlottesville, VA
Joan Kark - Giles County, VA
Joan Yater - Alexandria, VA
Joe Bearden - Raleigh, NC
Joe Pitt - Newport, VA
John Hunter - Loudoun, VA
John A. Mcleod Iii - Montgomery, VA
John Andrew Walker - Blacksburg, VA
John Clewett - Fairfax County, VA
John Cook - Chesterfield, VA
John Whitley - Williamsburg, VA
John Whitley - Williamsburg, VA
Jolene Mafnas - Alexandria, VA
Jonah Earl Thomas - Fairfax, VA
Jonah Thomas - Fairfax, VA
Jonathan Reid - Montgomery, VA
Jonathan Sokolow - Reston, VA
Joseph Brancoli - Richmond, VA
Joseph Gerard Mcnamara - Waynesboro, VA

Joseph Jeeva Abbate - Buckingham, VA
Joseph Leonard Scarpaci - Blacksburg, VA
Joseph Schaub - Richmond, VA
Josh Stanfield - Yorktown, VA
Joshua Makela - Arlington, VA
Joshua Vana - Albemarle County, VA
Joshua Vana - Albemarle County, VA
Josie Taylor-Soltys - Williamsburg, VA
Judy Kniskern - Roanoke, VA
Julia Berutti - University Of Richmond, VA
Julia S Coleman - Chesterfield, VA
Julie Bauer - Vienna, VA
Julie Lee Kay - Fredericksburg, VA
Julie M Scofield - Staunton, VA
June S Loveless - Boones Mill, VA
Kaiser Farooque - Fairfax County, VA
Karen Bearden - Raleigh, NC
Karen Feridun - Berks County, PA
Karen R. Gill - , VA
Karis Tschopp - Fairfax, VA
Kate Salko - Westmoreland, VA
Kate Soderman - Charlottesville, VA
Katherine James - Nelson County, VA
Kathie Hoekstra - Alexandria, VA
Kathleen M. McClory - Richmond, VA
Kathryn Swartz - Harrisonburg, VA
Katie Whitehead - Pittsylvania County, VA
Kay L Ferguson & Joshua Vana - Charlottesville, VA
Kay Moore - Roanoke, VA
Kay Reibold - Raleigh, NC
Kelli Whitfield - Blacksburg, VA
Kelly Canavan - Prince George'S County, MD
Kenda Hanuman - Buckingham, VA
Kerstin Niedermaier - Richmond, VA
Kevin Campbell - Adrian, WV
Kimberley Homer - Montgomery County, VA
Kimberly C Cleland - Ashburn, VA
Kristin B. Peckman - Roanoke, VA
Kyle Nenninger - Blacksburg, VA
Lakshmi Fjord - Charlottesville, VA
Larry Shambley - Burlington, NC
Laura Legere - Roanoke, VA
Laura Lieberman - Lovettsville, VA
Laura Meyers - Henrico, VA
Laura Sullivan - Richmond, VA

Laurel West - Richmond City, VA
Lauren Landis - Norfolk, VA
Lawrence C. Hager - Falls Church, VA
Lawrence Tubb - Henrico, VA
Leah Zerbe - Pine Grove, PA
Lee Williams - Richmond, VA
Leigh Thomas - Crozet, VA
Leighton Powell - Richmond, VA
Leroy J Utt - Elkins, WV
Leslie Lytle' - Richmond, VA
Linda Higgins - Midlothian, VA
Linda Reik - Sullivan County, NY
Linda Tanner-Sutton - Roanoke Co., VA
Lindsay Newsome - Roanoke, VA
Liz Keily - Richmond, VA
Lois Lommel - Richmond, VA
Loretta Rowe - Fairfax, VA
Lorraine James - VA Beach, VA
Louisa Gay - Montgomery, VA
Luke Forbes - Fairfax County, VA
Lydia S Pittman - Southampton, VA
Lynda Majors - Blacksburg, VA
Lynn Gravelle - Chesterfield, VA
Lynn Snyder - Hanover, VA
Lynn Thorpe - Giles, VA
Mac Mcarthur-Fox - Montgomery, VA
Madeleine Cáceres - Arlington County, VA
Madeleine Fitzgerald - Washington, DC
Madeline - Arlington, VA
Madigan Weidner - Richmond, VA
Maggie Collins - Richmond, VA
Maggie Herndon - Williamsburg, VA
Mara Robbins - Henrico, VA
Marc Koslen - Bath, VA
Margaret Rhodes - Arlington, VA
Margaret Van Yahres - Charlottesville, VA
Maria-Celeste Delgado-Librero - Roanoke, VA
Marie Flowers - Dillwyn, VA
Marilyn Elie - Cortlandt Manor, NY
Marilyn Karp - Haymarket, VA
Marilyn Payne - Montgomery, VA
Mark D. Freeman, DVM - Newport, Giles County, VA
Mark Hefflinger - National, NE
Marla Marcum - Knoxville, TN
Martha Girolami - Chatham, NC

Mary Ann Capp - Montgomery, VA
Mary Atkins - Richmond, VA
Mary Beth Rogers - Milford, VA
Mary Coffey - Bent Mountain, VA
Mary E Rives - Roanoke, VA
Mary Ellen Correa - Richmond, VA
Mary Finley-Brook - North Chesterfield, VA
Mary Harshfield - Roanoke, VA
Mary Imhof - Giles, VA
Mary Keene - Roanoke, VA
Mary Miller - Richmond, VA
Mary Mott - Copper Hill, VA
Marybeth Coffey - Bent Mountain, VA
Matthew Cahn - Arlington, VA
Maureen O'Donnell - Fairfax, VA
Max Rowland - Charlottesville, VA
Mckenna Dunbar - Richmond, VA
Meg Lessard - Richmond, VA
Meg Mall - Reston, VA
Megan Taylor - Charlottesville, VA
Meghan Sirry - Chesterfield County, VA
Melody Titus - Ashland, VA
Meredith Goodrich - Giles, VA
Meredith Haines - Vienna, VA
Micaela Pond - Arlington, VA
Michael Bentley - Salem, VA
Michael Donnenberg - Richmond, VA
Michael Farley - Louisa, VA
Michael James-Deramo - Richmond, VA
Michael Williams - Montgomery County, VA
Michele C Deramo - Blacksburg, VA
Michele Riedel - Chesterfield, VA
Michelle Duplissis - Alexandria, VA
Michelle R Kisliuk - Charlottesville, VA
Mike Freeland - Manassas, VA
Miles Johnson - Afton, VA
Milton E. Marks - Roanoke County, VA
Miriam Westervelt - Loudoin, VA
Mollee Sullivan - Chesterfield, VA
Nan Gray, Lpss - Newport, VA
Nancy A. Maurelli - Roanoke City, VA
Nancy Dalton Hall - Annandale, VA
Nancy Huff - Roanoke County, VA
Nancy Hummer - Prince William County, VA
Nancy Mcgehee - Blacksburg, VA

Nancy Vehrs - Prince William County, VA
Natalie Deboer - Richmond, VA
Natalie Pien - Loudoun County, VA
Nava - Charlottesville, VA
Nicholas Copeland - Montgomery, VA
Nicholas Polys - Blacksburg, VA
Nicole Anderson Ellis - Henrico, VA
Nina Islam - Ashburn, Loudoun County, VA
Nora Callahan - Arlington, VA
Norah Holsten - Independence, VA
Norm Bell - Monterey, VA
P Curtis - Charlottesville, VA
Pamela Goddard - Washington, DC
Pamela P. Humphrey - Newport, VA
Patricia Cox - Roanoke City, VA
Patricia D. Brown - Christiansburg,, VA
Patricia Ramsay - Richmond, VA
Patrícia Talbot - Blacksburg, VA
Patrick Sherman - Richmond, VA
Paul Belote - Chesapeake, VA
Paula L. Mann - Greenville, WV
Peter Montgomery - Montgomery, VA
Philip Schaffner - Norfolk, VA
Phyllis T. Albritton - Blacksburg, VA
Polly Branch - Roanoke, VA
Queen Zakia Shabazz - Richmond, VA
Rachel Corrigan - Blacksburg, VA
Raymond S Martin - Mclean, VA
Razan Khalil - Chicago, IL
Rebecca A Schneider - Richmond City, VA
Rebecca Carter - Richmond, VA
Rebecca Roterv - Susquehanna, PA
Rebecca Silva - Alexandria, VA
Rebekah Sale - Us National Group, NY
Rebel A. Cannan - Giles, VA
Rev David Denham - Roanoke City, VA
Rev David Denham - Roanoke City, VA
Rev. Dr. Heather A. Warren - Albemarle, VA
Rhonda G Dennis - Buckingham, VA
Rhonda Ryan - Roanoke, VA
Richard Rutherford - Staunton, VA
Richard Shingles - Giles County, VA
Robert (Bob) Peckman - Roaoke County, VA
Robert G. Fasick, Jr. - Fairfax, VA
Robert J. Anderson - Hampton, VA

Robert McNutt - Chatham, VA
Robin L Barnhill - Roanoke, VA
Robin Marcato - Danville, VA
Ron Meyers - Craig County, VA
Rudy Vietmeier - Roanoke, VA
Russell Chisholm - Newport, VA
Ruth Peck Roberts - Chesterfield, VA
Ruth Sherman - Roanoke, VA
Ryan Wesdock - Giles County, VA
S. Rebecca Hughes - Giles County, VA
S. Thomas Bond - Jane Lew, WV
Samir Chowdhury - Mclean, VA
Sandi Webst Er - Giles, VA
Sandra Lockhart - Lovettsville, VA
Sandra Schlaudecker - Blacksburg, VA
Sara Bell - Monterey, VA
Sarah Haring - Blacksburg, VA
Sarah Lanzman - Dyke, VA
Sarah Snyder & Stephen Plant - Herndon, VA
Scott Ziemer - Albemarle, VA
Shaina Lapolla - Richmond, VA
Sharon Ponton - Lovington, VA
Sharon Pruett - Roanoke, VA
Sharon Shutler - Usa, VA
Shavon Peacock - Richmond, VA
Shay Clanton - Deerfield, VA
Sheila Weidner - Ventura, CA
Shelley Tamres - Sterling, VA
Siren Jones - Charlottesville, VA
Sonia Ballinger - Loudoun County, VA
Sophia Hartman - Richmond, VA
Stacy Lovelace - Bedford, VA
Stacy Sallerson - Chesterfield, VA
Steph Sterner - VA Beach, VA
Stephanie Malady - Chester, VA
Stephanie Rowan - Richmond, VA
Stephen H Maxwell - Staunton, VA
Steve Baggarly - Norfolk, VA
Steve Bernard - Boones Mill, VA
Steven Gillespie - Blacksburg, VA
Sudhanshu Pathak - Fredericksburg, VA
Sue Herbein - Pulaski, VA
Susan Ann Miller - Richmond, VA
Susan Edwards - Newport, VA
Susan Kalan - Orange, VA

Susan M. Scerbo - Chesapeake, VA
Susan Olivier - Montgomery County, VA
Susan Weltz - Vienna, VA
Susannah Smith - Lynchburg, VA
Suzanne Glasson - Montgomery, VA
Suzanne Keller - Richmond, VA
Tallulah Costa - , VA
Tammy Murphy - Philadelphia, PA
Ted Glick - Bloomfield, NJ
Terry Huxhold - Roanoke City, VA
Thalia Hernandez - Richmond, VA
Theodore Majdosz - Stafford, VA
Therese Barlow-Dennis - Page, VA
Tiffanie Pirault - Richmond, VA
Tina Volz-Bongar - Peekskill, NY
Tiziana Bottino - Prince William County, VA
Tobias Cap - Niagara Falls, NY
Tom A Benevento - Harrisonburg, VA
Tom Burkett - Cape Charles, VA
Tom Hoffman - Pearisburg, VA
Tom Stephens - Charlottesville, VA
Toru Oba - Buckingham, VA
Travis L. Williams - Richmond, VA
Trish Mclawhorn - Montgomery, VA
Trudy Phillips - Lynchburg, VA
Valerie J Dymond - Blacksburg, VA
Vanessa Bolin - Richmond, VA
Vicki Moffitt - Falls Church City, VA
Victor Bucklew - Richmond, VA
Vikki Ronnau - Powhatan, VA
Virginia (Ginny) Pannabecker - Blacksburg, Montgomery County, VA
Virginia A. Moore - Charlottesville, VA
Virginia Barsby - Richmond, VA
Virginia R Barsby - Richmond, VA
Virginia Rovnyak - Albemarle, VA
Walter Wierwille - Alexandria, VA
William Davies - Richmond, VA
William Eads - Chesapeake, VA
William Ronnau - Chesterfield, VA
Wyatt Reed - Washington, DC
Yvonne Taylor - Watkins Glen, NY
Zander Pellegrino - Harrisonburg, VA

Archived: Wednesday, March 10, 2021 9:33:47 AM

From: [Glen Besa](#)

Sent: Tuesday, March 9, 2021 11:54:51 AM

To: anita.walthall@deq.virginia.gov

Subject: Request for a public hearing on Lambert Point Compressor Station

Importance: Normal

Dear Ms. Walthall:

I am requesting a public hearing before the Air Board on the Lambert Point Compressor Station that would serve the proposed Mountain Valley Pipeline.

I am also expressing my opposition to the air permit for the compressor station and which to make my concerns known to the air board. Dominion Energy's compressor station at Union Hill that was defeated and abandoned raised the similar concerns which need to be addressed by DEQ and the Air Board.

I am especially concerned with the Hazardous Air Pollutants' impacts on nearby communities of color and other neighboring environmental justice communities. Such issues contributed to the demise of the Union Hill Compressor station and the Air Board is obligated to hear from these communities. Additionally, because broadband is not readily available in these communities, DEQ and the Air Board need to pursue other means to accommodate their voices being heard.

Thanks for your attention to this matter.

--

Glen Besa

4896 Burnham RD

North Chesterfield, VA 23234

glenbesa@gmail.com

c-804-387-6001

Pronouns: he, him, his

Archived: Wednesday, March 10, 2021 9:33:48 AM

From: grjones1810@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:01:37 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Gale Jones

1810 Doron Ln Richmond, VA 23223-1908

grjones1810@gmail.com

Archived: Wednesday, March 10, 2021 9:33:48 AM

From: sdburns13@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:03:00 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Stephanie Burns

4500 28th Rd S Unit C Arlington, VA 22206-3311

sdburns13@gmail.com

Archived: Wednesday, March 10, 2021 9:33:48 AM

From: frank.p.callahan@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:03:09 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr. Frank Callahan Callahan

11229 Wellesley Terrace Ct Henrico, VA 23233-7701

frank.p.callahan@gmail.com

Archived: Wednesday, March 10, 2021 9:33:48 AM

From: cwsmes@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:03:25 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board. Clean air is a right for all of us.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,
Ms. Mary Ellen Stahley
2250 Clarendon Blvd Arlington, VA 22201-3332
cwsmes@gmail.com

Archived: Wednesday, March 10, 2021 9:33:48 AM

From: ccollinsm811@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:05:56 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Ms. Casandra Monroe

1734 Rockledge Ter Woodbridge, VA 22192-2508

ccollinsm811@gmail.com

Archived: Wednesday, March 10, 2021 9:33:48 AM

From: jaminor06@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:08:04 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Mr. James Minor

2 Barclay Ln Stafford, VA 22554-7724

jaminor06@gmail.com

Archived: Wednesday, March 10, 2021 9:33:49 AM

From: tigerpawllc@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:09:06 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Mr. Mark Gregory

164 Wellington Cir Williamsburg, VA 23185-8354

tigerpawllc@gmail.com

Archived: Wednesday, March 10, 2021 9:33:49 AM

From: whobbs1117@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:09:51 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Mrs. Wendy Hobbs

3055 Tranbycroft Way Sandy Hook, VA 23153-2239

whobbs1117@comcast.net

Archived: Wednesday, March 10, 2021 9:33:49 AM

From: knez.michael@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:17:37 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Mr. Michael Knez

633 Whiting Creek Rd Locust Hill, VA 23092-9709

knez.michael@gmail.com

Archived: Wednesday, March 10, 2021 9:33:52 AM

From: region2vsc@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:19:49 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr. Mark Lomax

1160 Waterview Rd Water View, VA 23180

region2vsc@gmail.com

Archived: Wednesday, March 10, 2021 9:33:52 AM
From: bbmeehan+naacpalerts@everyactioncustom.com
Sent: Tuesday, March 9, 2021 12:22:21 PM
To: anita.walthall@deq.virginia.gov
Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air
Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,
Mr. Brendan Meehan
1045 N Utah St Apt 502 Arlington, VA 22201-5753
bbmeehan+naacpalerts@gmail.com

Archived: Wednesday, March 10, 2021 9:33:52 AM

From: rperry1906@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:22:24 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Mr. Robert Perry

12606 Stone Lined Cir Woodbridge, VA 22192-5597

rperry1906@gmail.com

Archived: Wednesday, March 10, 2021 9:33:52 AM

From: twhernandez@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:23:03 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Ms. Thalia Hernandez

2008 Rosewood Ave Apt A Richmond, VA 23220-5834

twhernandez@email.wm.edu

Archived: Wednesday, March 10, 2021 9:33:53 AM

From: pjhac2011@everyactioncustom.com

Sent: Tuesday, March 9, 2021 12:23:45 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Mrs patricia Jordan

7135 Harver Way Mechanicsville, VA 23111-4345

pjhac2011@gmail.com

Archived: Wednesday, March 10, 2021 9:33:53 AM

From: baumeistmk@msn.com@mg.gospringboard.io

Sent: Tuesday, March 9, 2021 2:28:44 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Mary Baumeister
7111 LAKE COVE DR
Alexandria VA, 22315-4220

Archived: Wednesday, March 10, 2021 9:33:53 AM

From: [Daniel Dalton](#)

Sent: Tuesday, March 9, 2021 10:17:22 PM

To: anita.walthall@deq.virginia.gov

Subject: Comment on MVP Southgate Lambert Compressor Station Air Permit Application

Importance: Normal

Dear Ms. Anita Walthall,

I am Jessica Dalton and I own property and live near the Lambert Compressor Station site in the Banister District. I would like to request that DEQ and the Air Pollution Control Board approve the air permit for MVP Southgate's Lambert Compressor Station.

The project would have no adverse effects on air emissions in the area, providing a clean and safe industry in our county. This facility would also contribute much needed economic resource for the community.

I have had conversations with company representatives on several occasions and appreciate MVP Southgate's outreach and support to the community.

Thank you for the opportunity to provide comments.

-JSD

Sent from [Mail](#) for Windows 10

Archived: Wednesday, March 10, 2021 9:33:53 AM

From: swilson121@everyactioncustom.com

Sent: Tuesday, March 9, 2021 10:11:24 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. Sue Wilson

121 Huntercombe Williamsburg, VA 23188-7431

swilson121@aol.com

Archived: Wednesday, March 10, 2021 9:33:53 AM

From: darrlynnfranklin@everyactioncustom.com

Sent: Tuesday, March 9, 2021 9:52:20 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Ms. Darrlynn Franklin

150 Century Dr Alexandria, VA 22304-5784

darrlynnfranklin@yahoo.com

Archived: Wednesday, March 10, 2021 9:33:53 AM

From: Esthercy717@everyactioncustom.com

Sent: Tuesday, March 9, 2021 9:47:58 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Ms. Elizabeth Hendrix

13418 Elevation Ln Herndon, VA 20171-4007

Esthercy717@gmail.com

Archived: Wednesday, March 10, 2021 9:34:02 AM

From: scrith@everyactioncustom.com

Sent: Tuesday, March 9, 2021 9:30:09 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board. This project would bring no benefit to the residents of Pittsylvania, and in fact would only contribute to the further degradation of their air quality in order to move fracked fuel into North Carolina.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,
Mr. Douglas Broome
2105 Kent St Henrico, VA 23228-5733
scrith@audiomoticon.org

Archived: Wednesday, March 10, 2021 9:34:06 AM

From: ayyogurt@everyactioncustom.com

Sent: Tuesday, March 9, 2021 9:25:21 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Ms. Amanda Yoder

337 Velva Dr Chesapeake, VA 23325-3634

ayyogurt@yahoo.com

Archived: Wednesday, March 10, 2021 9:34:13 AM

From: karen@everyactioncustom.com

Sent: Tuesday, March 9, 2021 9:14:02 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Sincerely,

Ms Karen Jones

9 Depot St NE Christiansburg, VA 24073-5037

karen@karenejones.co

Archived: Wednesday, March 10, 2021 9:34:13 AM

From: [Max Knight](#)

Sent: Tuesday, March 9, 2021 9:04:18 PM

To: anita.walthall@deq.virginia.gov

Subject: MVP Southgate Compressor Station

Importance: Normal

Hello,

I would like to request that the VA DEQ Air Pollution Control Board conduct a public hearing on the permit for the Mountain Valley Pipeline Lambert Compressor Station. As a young person, I am concerned about the long-term impacts of the compressor station on Virginia's environment and air quality. If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants. Additionally, the permit's EJ Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated. EJScreen is a tool with limited precision in rural areas because of the large size of census tracts and the tendency for smaller population clusters and pollution hotspots to be hidden.

Sincerely,

Max Knight

They/Them/Theirs

226 Richmond Rd Williamsburg VA, 23186

(503)-597-9004

Archived: Wednesday, March 10, 2021 9:34:17 AM

From: sylviawood@everyactioncustom.com

Sent: Tuesday, March 9, 2021 8:52:01 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs SYLVIA C Wood

625 Westover Hills Blvd Richmond, VA 23225-4582

sylviawood@comcast.net

Archived: Wednesday, March 10, 2021 9:34:21 AM

From: B EVANS

Sent: Tuesday, March 9, 2021 8:36:26 PM

To: anita.walthall@deq.virginia.gov

Subject: Lambert Compressor Station

Importance: Normal

We are opposed to the construction and operation of the proposed Lambert Compressor Station, on environmental and economic grounds.

John and Judith Bevens

1756 Smithfield Dr

Blacksburg VA 24060

jeb1177@gmail.com

Archived: Wednesday, March 10, 2021 9:34:25 AM

From: jsdurand2015@everyactioncustom.com

Sent: Tuesday, March 9, 2021 8:31:28 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Julia Durand

4444 36th St S Arlington, VA 22206-1818

jsdurand2015@hotmail.com

Archived: Wednesday, March 10, 2021 9:34:29 AM

From: allengf@everyactioncustom.com

Sent: Tuesday, March 9, 2021 7:20:07 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. G Fay Allen Allen

4649 Merrimac Ln Virginia Beach, VA 23455-6366

allengf@msn.com

Archived: Wednesday, March 10, 2021 9:34:32 AM

From: [Gracie Patten](#)

Sent: Tuesday, March 9, 2021 7:16:28 PM

To: anita.walthall@deq.virginia.gov

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Hello,

I would like to request that the VA DEQ Air Pollution Control Board conduct a public hearing on the permit for the Mountain Valley Pipeline Lambert Compressor Station. As a young person, I am concerned about the long term impacts of the compressor station on Virginia's environment and air quality. If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air polluting facility for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially hazardous air pollutants. Additionally, the permit's EJ Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated. EJScreen is a tool with limited precision in rural areas because of the large size of census tracts and the tendency for smaller population clusters and pollution hotspots to be hidden.

Sincerely,

Gracie Patten

Archived: Wednesday, March 10, 2021 9:34:38 AM
From: Beth Kreydatus
Sent: Tuesday, March 9, 2021 7:15:06 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Dear Ms. Walthall,

I am writing to request a full hearing in front of the Virginia Air Pollution Control Board regarding the MVP Lambert Compressor Station Draft Air Permit. I am a resident at 2104 Winnwood Rd., Henrico VA 23228 and a longtime resident of Virginia.

I am opposed to this project because of concerns I have regarding cumulative impact, but I'm particularly concerned about the environmental justice impacts of this permit. I believe that, once again, the DEQ is seriously considering permitting a project with unfair and disproportionate impacts on an EJ community. I am disappointed at the process that the DEQ repeatedly has used to identify whether a community impacted by a permit meets the definition of an EJ community. The permit's EJ Screen was conducted by census tract, and it seems the DEQ and the MVP did very little to investigate whether there were alternate sites that had lower environmental justice impacts before settling on Lambert's proposed site. The census tract analysis is inadequate to identify an EJ community, and the DEQ has been repeatedly asked to use the more accurate census block data, especially in rural communities. They should be required to evaluate the site more carefully before seriously considering a permit application of this nature.

In communities like Charles City County and Buckingham County and in the communities around Norfolk Naval Shipyard, the DEQ failed to acknowledge that there was a sizable environmental justice population that would be disproportionately impacted, and especially in Buckingham and Charles City, the DEQ wrongly used EJ Screen to try to dodge EJ questions in a rural community. EJ Screen is a tool that the EPA clearly warns, on their website, should not be used ["as a means to identify or label an area as an "EJ community."](#) But once again, the DEQ broadly claims that this Lambert site doesn't violate Virginia's EJ policies, despite the fact that there is a freedmen's community in the near vicinity, and there are 4 total EJ communities within a 3-5 mile radius of the proposed compressor station site. I believe that in the Lambert decision, the DEQ and the MVP are rushing and obscuring the question of environmental justice, because it has not been treated as the priority issue it must be.

I have devoted two years of my life to serving as a witness and supporting the residents of Charles City County, a majority minority community that the DEQ has targeted for the construction of Chickahominy Gas Plant and C4GT, two merchant gas plants that were permitted without any engagement of the African American community there. I fear that once again, the DEQ is rushing through a permit without appropriately engaging the community, and particularly the African American community, in this area. I beg of you, don't repeat the mistakes of that previous policy. I ask that you fully lift this decision to a full hearing before the Air Control Board, and most of all, I ask that you deny this permit. The legacy of state agencies like the DEQ should not continually be environmental racism and disproportionate burden for communities of color and poor communities.

With appreciation,

Beth Kreydatus

Associate Professor
Department of Focused Inquiry
University College
Virginia Commonwealth University
Pronouns: she, her, hers

1015 Floyd Avenue
Grace E. Harris Hall
Room 5145
Box 842015
Richmond, VA 23284-2015
ekreydatus@vcu.edu

Archived: Wednesday, March 10, 2021 9:34:44 AM

From: ribbman1@everyactioncustom.com

Sent: Tuesday, March 9, 2021 6:25:41 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr Robert Sayles Jr

4735 Hopewell Rd New Kent, VA 23124-3432

ribbman1@aol.com

Archived: Wednesday, March 10, 2021 9:34:48 AM

From: mike.sims@verizon.net

Sent: Tuesday, March 9, 2021 6:13:42 PM

To: anita.walthall@deq.virginia.gov

Cc: mike.sims@verizon.net

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Ms. Walthall:

I request that there be a public hearing before the full Air Board regarding this matter.

The MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166. Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. Formaldehyde can also increase complications of existing COPD and asthma. Higher concentrations of it can lead to tumor formation and pulmonary edema. Chronic levels of air pollution also can increase the rates of respiratory tract infections such as pneumonia. The permit's EJ Screen was conducted by census tract, not the more accurate census block data and therefore, the project's real impact may be under-estimated. DEQ should take cumulative impacts and existing levels of air pollution into consideration when evaluating the suitability of the proposed location for the Lambert Compressor Station. During the public information session on Jan 7, 2021 regarding the timeline for approval, members of the public flagged that the timeline seems set by the applicant. As the project is missing a major state level permit (a Clean Water Act 401 water certification from North Carolina), DEQ staff acknowledged that they possibly should NOT be moving forward.

It is patently obvious to me that a public hearing on something of this long term significance to your fellow Virginians warrants a public hearing before the full Air Board.

Thank you for your anticipated analysis.

Michael J Sims
14010 Briars Circle, Unit 403
Midlothian, VA 23114
804-971-8551

Archived: Wednesday, March 10, 2021 9:34:51 AM

From: thegate@everyactioncustom.com

Sent: Tuesday, March 9, 2021 5:47:33 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Anne Little

726 William St Fredericksburg, VA 22401-5751

thegate@cox.net

Archived: Wednesday, March 10, 2021 9:34:55 AM

From: cnjones16@everyactioncustom.com

Sent: Tuesday, March 9, 2021 4:58:55 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Chanelle Jones

424 River Arch Dr Chesapeake, VA 23320-2101

cnjones16@gmail.com

Archived: Wednesday, March 10, 2021 9:34:58 AM

From: [Chris Saxman](#)

Sent: Tuesday, March 9, 2021 4:44:11 PM

To: anita.walthall@deq.virginia.gov

Subject: Comment on MVP Southgate Lambert Compressor Station Air Permit Application

Importance: Normal

Attachments: [MVP Southgate.pdf](#) ;

Anita,

I am submitting this comment regarding MVP.

Thank you,

Chris Saxman



February 28, 2021

Ms. Anita Walthall
Blue Ridge Regional Office
Department of Environmental Quality
901 Russell Drive
Salem, Virginia 24153

Subject: MVP Southgate Lambert Compressor Station Air Permit Application

Dear Ms. Walthall:

As executive director of Virginia FREE, the premiere source of non-partisan political information for Virginia's business community, I am writing today in support of MVP Southgate's application for an air permit for the proposed Lambert Compressor Station.

The MVP Southgate project offers short- and long-term economic opportunities for southern Virginia and the commonwealth. The construction of the proposed 75-mile underground natural gas pipeline and associated facilities would create hundreds of jobs and stimulate business activity across Pittsylvania County. Once the project is operational, the pipeline will bring a new source of domestic natural gas through southern Virginia, providing greater opportunities for new residential and commercial access to an affordable, reliable and cleaner fuel source. Recent weather events have underscored the region's need for a diversity of supply sources to maintain affordable and reliable access to natural gas.

As you may know, southern Virginia has a long history of being home to manufacturing operations. The city of Danville and Pittsylvania County are working together to develop the Southern Virginia Mega Site at Berry Hill. This 3,500-acre mega-site is Virginia's largest, and it is primed for development. The proposed MVP Southgate project route passes through this proposed park, providing tremendous opportunity for potential future employers that may want to establish facilities in the region and draw natural gas from the pipeline to fuel operations.

It is critically important for infrastructure routes to be developed in ways that strive to minimize environmental impacts and respect private property. To that end, the MVP Southgate project is proposed to run adjacent to an existing right-of-way through most of its planned 26-mile route

in Virginia. This maximizes the potential benefits of the project to serve public need while minimizing potential adverse impacts associated with construction and operation. Furthermore, as the project's application for a minor-source air permit demonstrates, the proposed Lambert Station will have no adverse impact on air quality in the area surrounding the facility. This is a credit to MVP Southgate's team for designing the station with state-of-the-art features and technologies to protect air quality and public health.

The MVP Southgate project is important to the region and to the commonwealth. The efforts undertaken by the project team reflect a commitment to build the proposed pipeline and Lambert Compressor Station in a safe and respectful manner, and Virginia FREE supports it.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris Saxman". The signature is fluid and cursive, with a large initial "C" and a long, sweeping tail.

Chris Saxman
Executive Director
Virginia FREE

Archived: Wednesday, March 10, 2021 9:35:02 AM

From: rmoore198@everyactioncustom.com

Sent: Tuesday, March 9, 2021 4:40:07 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr. Raynard Moore

PO Box 1639 Louisa, VA 23093-1639

rmoore198@gmail.com

Archived: Wednesday, March 10, 2021 9:35:06 AM

From: anhthu.lu@gmail.com@mg.gospringboard.io

Sent: Tuesday, March 9, 2021 4:36:40 PM

To: [Anita Walthall](#)

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

anhthu lu
3313 Rose Ln
Falls Church VA, 22042-4012

Archived: Wednesday, March 10, 2021 9:35:10 AM

From: maburruss@everyactioncustom.com

Sent: Tuesday, March 9, 2021 4:31:17 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. Diana Burruss

912 Evergreen Rd Louisa, VA 23093-2926

maburruss@aol.com

Archived: Wednesday, March 10, 2021 9:35:14 AM

From: [Chris Hurst](#)

Sent: Tuesday, March 9, 2021 3:54:05 PM

To: [David Paylor Dir VDEQ](#)

Cc: anita.walthall@deq.virginia.gov

Subject: MVP Compressor Station - Pittsylvania County, VA Permit, Registration No. 21652

Importance: Normal

Attachments:

[Letter to DEQ re_ Lambert Compressor Station.docx](#) ;

Good Afternoon,

I attached a letter signed by multiple members about the above-referenced permit request.

Please feel free to contact me if you have any questions.

Best,

Troy

Benjamin Troy Garrett, M.A.

Chief of Staff

Office of Delegate Chris L. Hurst

12th House District

540.739.2553 (District Office)

804.698.1012 (Richmond Office)



Outlook-g12ugrkr.png



Letter to DEQ re_ Lambert Compressor Station.docx

March 10, 2021

Mr. David K. Paylor
Director, Department of Environmental Quality
1111 East Main Street, Suite 1400
Richmond, VA 23219

CC: Anita Walthall
Air Permit Writer, Department of Environmental Quality

Re: MVP Compressor Station - Pittsylvania County, VA Permit, Registration No. 21652

Dear Director Paylor and Ms. Walthall,

As members of the Virginia General Assembly, and representing thousands of Virginians, we write to express concerns with the draft air permit for the Mountain Valley Pipeline “Lambert Compressor Station,” Registration No. 21652, and respectfully request that the Department of Environmental Quality (DEQ) elevate the permit review to the full Air Pollution Control Board, and do so, after extending the public comment period an additional **45 calendar days**.

We, and our constituents, share many concerns about the permit application: the environmental justice consultant’s report may not be accurately represented in MVP’s application, minimizing demographic data for communities of color in close proximity to the proposed compressor station; cumulative impacts may not have been sufficiently reviewed; emissions data from a full range of Hazardous Air Pollutants is not thoroughly expressed in the permit; and the submission of two new, relevant reports on February 25, 2021—forty-seven days into the public comment period—precludes transparency and sufficient time for public review.

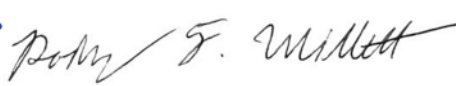
With the ongoing uncertainty of the MVP mainline, the developer’s history of violating Virginia’s environmental protections standards, and the potentially significant health impacts from the proposed station, a full and thorough review process by the public is critical.

As genuine public outreach and education should be a crucial part to any permit decision that would adversely impact Virginia communities, we respectfully ask that you extend the public comment period for 45 additional days and bring review of this permit to the full Air Pollution Control Board.

Sincerely,



Delegate Chris Hurst



Delegate Rodney Willett



Delegate Kaye Kory

A stylized, cursive handwritten signature in black ink, appearing to read 'Suhas Subramanyam'.

Delegate Suhas Subramanyam

A cursive handwritten signature in black ink, appearing to read 'Kenneth R. Plum'.

Delegate Kenneth R. Plum

A cursive handwritten signature in black ink, appearing to read 'Sally Hudson'.

Delegate Sally Hudson

Archived: Wednesday, March 24, 2021 7:23:02 AM

From: hannah.scherer@everyactioncustom.com

Sent: Tuesday, March 23, 2021 5:23:43 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Dr. Hannah Scherer

1903 Gardenspring Dr Blacksburg, VA 24060-6015

hannah.scherer@gmail.com

Archived: Wednesday, March 24, 2021 7:23:02 AM

From: [Woodie Walker](#)

Sent: Tuesday, March 23, 2021 2:10:46 PM

To: anita.walthall@deq.virginia.gov

Subject: Stationary Source Permit > Chatham Va Reg. # 21652

Importance: Normal

Hi Anita,

The Rappahannock Tribe does not wish to be a consulting party for the Mountain Valley Pipeline-Lambert Compressor Station stationary source permit in Chatham, Pittsylvania County.

The project area is outside our general region of concern, which is the historic and contemporary homeland of the Rappahannock Tribe.

Our general region of concern includes the Northern Neck and Middle Peninsula, downstream of the Fall Line (east of I-95).

Thank you for reaching out to us,

Woodie

.....

Woodie Walker, Director of Environmental Services

Historian and Curator Δ/t

Rappahannock Tribe

5036 Indian Neck Road

Indian Neck, Va. 23148

wwalker@rappahannocktribe.org

(804) 769-0260 x. 107

Archived: Wednesday, March 24, 2021 7:23:02 AM

From: jaguilar@everyactioncustom.com

Sent: Tuesday, March 23, 2021 11:39:09 AM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing on behalf of our Food & Water Watch members in the state to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr. Jorge Aguilar

1616 P St NW Ste 400 Washington, DC 20036-1418

jaguilar@fwwatch.org

Archived: Thursday, March 25, 2021 7:10:39 AM

From: eakreydatus@everyactioncustom.com

Sent: Wednesday, March 24, 2021 7:45:39 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Dr. Beth Kreydatus

2104 Winnwood Rd Henrico, VA 23228-6046

eakreydatus@vcu.edu

Archived: Friday, March 26, 2021 8:42:51 AM
From: harrison-01@msn.com[@mg.gospringboard.io](mailto:mg.gospringboard.io)
Sent: Thursday, March 25, 2021 4:09:57 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Roderick Harrison
12113 Walnut Branch Rd.
Reston VA, 20194-5631

Archived: Monday, March 29, 2021 7:46:06 AM
From: aerinjcuff@gmail.com@mg.gospringboard.io
Sent: Saturday, March 27, 2021 3:34:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Pennsylvania, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Aerin Cuff
3722 School Lane
Drexel Hill PA, 19026-3018

Archived: Monday, March 29, 2021 7:46:06 AM
From: rhoades.ba@gmail.com@mg.gospringboard.io
Sent: Saturday, March 27, 2021 3:33:40 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Ben Rhoades
3704 University Drive
Fairfax VA, 22030-2312

Archived: Monday, March 29, 2021 7:46:06 AM

From: abinaya.venkatesan15@gmail.com@mg.gospringboard.io

Sent: Saturday, March 27, 2021 3:32:41 PM

To: Anita Walthall

Subject: Deny Permit No. 21652 for the Lambert Compressor Station

Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the Lambert Compressor Station's air permit which would allow the facility to emit dangerous pollutants to nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Abinaya Venkatesan
25544 Oak Medley Terrace
Aldie VA, 20105-2665

Archived: Wednesday, March 31, 2021 6:33:18 AM
From: [Pearce, Bradford](#)
Sent: Tuesday, March 30, 2021 10:44:54 AM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal
Attachments:
[Comment on the Lambert Compressor Station.docx](#) ;

Hi,

Please see attached my comment on the proposed Lambert Compressor Station Draft Air Permit.

Sincerely,
Brad Pearce

804-799-8989
bpearce@rvaschools.net
2410 Perry St. Apt #1
Richmond, VA 23225

Brad Pearce

804-799-8989

2410 Perry Street Apt #1

Richmond, VA 23225

I am making a comment about the Lambert Compressor station because I am concerned about environmental justice and climate change. I became a proponent of using fewer fossil fuels when I learned about climate change several years ago. I did not know then the degree to which environmental issues are often frequently social justice issues. The proposed Lambert compression statement qualifies as an environmental justice issue because those affected have not been properly considered in the current assessments. I am joining others in asking that the permit be referred to the Air Quality Control Board so that more time can be given to consider those who will be most directly affected by the compressor station.

Cumulative impacts and existing levels of air pollution need to be more fully understood for this permit to be issued. The permit's current data is based on an EJ Screen from census data, not the more accurate census block data, and there are serious discrepancies between the information MVP's consultant provided in the EJ Analysis Report, and what MVP ultimately communicated in its final permit application. There also remain additional responsibilities for outreach leading for meaningful engagement to the communities who will be affected. Further, data in the September 2020 revised permit application used data for only communities within a 1-mile radius of the proposed station, while they should consider communities, as suggested by their own consultant's report, within a 3-5-mile radius. Likewise, complete and accurate assessments of alternative sites for the station are not provided by the permit application.

There is also a lack of information in the current draft permit: the only hazardous air pollutant that is subject to hourly and yearly emission limits in the draft permit is formaldehyde. Other chemicals are also going to be emitted, and the Lambert station would emit 30% more particulate matter into the air. The communities surrounded the proposed station have more people 64 years or older than the state and national averages. Cardiorespiratory mortality, leukemia, and pneumonia are all related to higher levels of chemicals that the station, along with the existing 2 stations, will emit into the air.

I am asking, with others, that the permit be referred to the Air Quality Control Board, so that more time can be given to assess new census data, and, moreover, to engage with the community whose health will be most affected by the proposed station.

Sincerely,

Brad Pearce

Archived: Monday, April 5, 2021 7:26:21 AM

From: tlsmusz@everyactioncustom.com

Sent: Friday, April 2, 2021 11:11:09 AM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

The Lambert compressor station planned for Pittsylvania County for the Mountain Valley Pipeline presents a huge health threat to the local communities. The "Minor"(quotes are mine) New Source Review Permit should be denied and referred to the Air Pollution Control Board.

The current permitting process is woefully inadequate in not addressing (1) toxic cumulative direct and indirect impacts on the local community , (2) an inclusive community engagement program, and (3) not performing an accurate air quality modeling analysis which includes contributions from the existing Compressor Stations. Furthermore, the Air Quality Control Board should request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

The existing compressor stations already impair the health of the community via increased particulate matter levels, as well as other air toxins such as nitrogen oxides, formaldehyde, and carbon monoxide. Many other toxins are emitted via compressor station off gassing, which derive from impurities (and unidentified compounds from fracking fluids) in fracked gas. A large body of research supports this contention. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Dr. Tina Smusz

5555 Mount Tabor Rd Catawba, VA 24070-1903

tlsmusz@gmail.com

Archived: Monday, April 5, 2021 7:28:04 AM
From: kts4books@cs.com
Sent: Saturday, April 3, 2021 10:12:52 AM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Hello Anita, DEQ

I am submitting a comment opposing the Lambert Compressor Station. Besides the Lambert Compressor Station's impacts on local air quality, other environmental concerns, and the issues of environmental justice in the surrounding community, I oppose the entire construction of the Mountain Valley Pipeline.

I deeply believe the Mountain Valley Pipeline is totally unnecessary and being built solely for the financial gain of the corporations of ownership. There is absolutely ample pipeline capacity to meet our present and future needs for movement of natural gas. To approve environmental risk to our rivers and mountains for gas excess to be exported would be negligent on the part of DEQ.

Our state, nation, planet need to stop investing in fossil fuel infrastructure and instead accelerate renewable sources of energy. Otherwise, my and your grandchildren will find themselves living on an inhospitable planet!

Marc Koslen
570 McGuffin Rd.
Warm Springs, VA 24484
540-839-3508



Serving Danville • Halifax County • Pittsylvania County

Danville Community College

1008 South Main Street • Danville, Virginia 24541-4004

434.797.2222 • TTY: 434.797.8542

Fax: 434.797.8541 • www.dcc.vccs.edu

March 31, 2021

Virginia Department of Environmental Quality
Attention: Anita Walthall, Blue Ridge Regional Office
901 Russell Drive
Salem, Virginia 24153



Dear Ms. Walthall:

I am writing to support a New Minor Source Review Permit for MVP Southgate's Lambert compressor station. As Vice President of Workforce Services at Danville Community College, I spend much of my time evaluating opportunities that can enhance the city and region and provide guidance on their merits.

I believe Mountain Valley's project presents a worthwhile opportunity for the reasons outlined below.

Community engagement

Mountain Valley's community involvement spans more than six years due to its work on the separate Mountain Valley Pipeline, which is nearing completion. During this time, Mountain Valley has demonstrated itself to be a good community partner, with representatives who are accessible, engaged, and supportive of local business and educational programs.

The MVP Southgate team's interest in providing scholarships for multiple DCC students residing in Pittsylvania County's Bannister District is one example of the company's commitment to ensuring equitable opportunities for underrepresented Virginians. Other examples include the company's support for various community endeavors, including the local chamber of commerce, pandemic-relief services benefitting local K-12 students and their families, and the sheriff's Halloween Trunk-or-Treat event.

Economic and workforce-related benefits

While the Mountain Valley Pipeline has generated substantial job and tax revenue opportunities for this region, the MVP Southgate project will provide additional benefits during construction and operation. Construction of MVP Southgate, including the Lambert compressor station, will generate hundreds of jobs and millions of dollars in tax revenue to support state- and local-sponsored programs and services. This infusion of tax revenue will positively impact our region and our quality of life, and the immediate impact of construction-related jobs will provide new opportunities to local residents seeking work.

Furthermore, the MVP Southgate project's route primarily runs along the existing Transco pipeline. It will pass through the Southern Virginia Mega Site at Berry Hill, providing greater natural-gas supply access to potential employers that locate at this business park.

Reliable access to affordable natural gas is a priority for large employers looking to site new facilities, and MVP Southgate complements existing resources that make our region appealing

for existing and future business development. Ad valorem taxes paid annually by Mountain Valley once the project enters service also will benefit the public.

Environmental sustainability

The national effort to generate more electricity by using natural gas in place of coal has successfully driven down U.S. carbon emissions, according to the U.S. Energy Information Administration. Moreover, burning natural gas for home heating and cooking, or industrial or transportation uses, emits less carbon dioxide than alternative fuels such as propane, heating oil, gasoline, and diesel. In short, this is a cleaner fuel source that is both abundant and cheaply priced, and its greater adoption provides tangible economic and environmental benefits to working families. While it is essential to promote renewable energy sources, it is equally important to promote a diverse, reliable and affordable supply of energy to meet the public's modern daily needs. MVP Southgate would help achieve such a goal.

The Lambert compressor station features advanced technologies that meet all applicable air standards. The Department of Environmental Quality has acknowledged the facility's operation will have no adverse impact on air quality in the region. I understand that air quality in the area will improve following ongoing modifications at a nearby Transco facility and completion of the Lambert station compared to current air quality conditions.

For these reasons, I am pleased to support MVP Southgate's application for a New Minor Source Review Permit. I hope it is the will of the board to approve it.

Sincerely,

A handwritten signature in black ink, appearing to be 'BJ', with a long horizontal line extending to the right.

Brian Jackson, Ph.D., CWDP
Vice President of Workforce Services

Archived: Tuesday, April 6, 2021 8:31:20 AM

From: 4catbiz@everyactioncustom.com

Sent: Monday, April 5, 2021 3:39:30 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Cathryn McCue

1615 Cambridge Cir Charlottesville, VA 22903-1315

4catbiz@gmail.com

Archived: Tuesday, April 6, 2021 8:31:20 AM
From: William Limpert
Sent: Monday, April 5, 2021 2:34:26 PM
To: Walthall, Anita
Subject: Lambert Air Permit Comments
Importance: Normal
Attachments:
[Lambert Air Discharge Permit Written Comments.pdf](#); [Untitled attachment 00009.htm](#) ;

Virginia Department of Environmental Quality
901 Russell Drive
Salem, Virginia 24153
Attn: Anita L. Walthall
Air Permit Writer

Re: Comments on Proposed Air Discharge Permit for the Proposed Lambert Compressor Station

April 5, 2021

Dear Ms. Walthall:

I hereby submit comments in opposition to the Virginia Department of Environmental Quality draft air discharge permit for the proposed Lambert Compressor Station at 987 Transco Road, Chatham, VA 24531. The applicant is Mountain Valley Pipeline, LLC 21652.

I am commenting as an individual.

William F. Limpert
wflimpert@gmail.com
4102B Garfield Road
Smithsburg, MD 21783
301-416-0571

Summary

The Virginia Department of Environmental Quality (DEQ) should not issue an air discharge permit for the proposed Lambert Compressor Station.

DEQ lacks sufficient information to determine the extent of pollution and public health impacts that already exist in the Chatham community from the nearby Transco compressor stations, and other possible pollution sources. DEQ also lacks sufficient information to satisfactorily determine the extent of pollution and public health impacts to the Chatham community that would occur from pollutant discharges from the proposed Lambert Compressor Station.

I hereby request a public hearing before the full Air Pollution Control Board in order for the Board to hear directly from concerned citizens regarding the threat to public health and the environment from the proposed Lambert Compressor Station. I also request that the hearing provide remote access for commenters, and that written comments can be made directly to the Board for their consideration.

I have an interest in this issue as I am concerned about the public health and environmental consequences of pollutant discharges from the Lambert Compressor Station, especially to residents of the Chatham community.

I also have an interest in this issue because, if built, the Lambert Compressor Station will emit large volumes of methane, carbon dioxide, and other greenhouse gases into our atmosphere far into the future, and further exacerbate our climate emergency.

I have added an Addendum at the end of this report that provides supporting information and references for some of my comments. The Addendum contains documentation from reports that I wrote for the Mountain Valley Pipeline (MVP) and Southgate Pipelines. It contains information that is pertinent to air pollutant discharges from the proposed Lambert Compressor Station, since the compressor station would carry and discharge the same and similar pollutants as the MVP and Southgate.

My comments will show that:

Current public health conditions, and the extent of pollution to the air, soil, and water at the site, and in the Chatham community have not been properly assessed.

DEQ does not have adequate information to satisfactorily determine if permit issuance would comply with Virginia law, negatively impact the public health, or pollute the air, soil, or water.

The air modeling that was used is not reliable for this facility.

Leaks, fugitive emissions, and resultant pollution are underestimated.

The public health and environmental impacts of many pollutants that would be discharged have not been satisfactorily assessed due to numerous regulatory waivers.

Existing Community Public Health and Environmental Conditions at the Site and In the Local Community Have Not Been Satisfactorily Assessed

The following comments are in response to Section I of the DEQ engineering analysis for site suitability. A satisfactory site suitability assessment has not been completed for the proposed Lambert Compressor Station.

Although it is well known that many of chemicals carried in the natural gas stream are detrimental to human health and the environment, there is a scarcity of studies that assess public health impacts to communities near natural gas compressor stations. There are even less studies that have sampled the air, water, and soil for the many pollutants that are discharged from natural gas compressor stations in and around the local communities where these compressor stations are located.

However, several recent studies indicate significant concerns.

Hendryx et al, 2020 (1) conducted a county-level ecological study, using VOC emission data from the 2017 National Emissions Inventory, and found that total age-adjusted mortality, controlling for covariates (race/ethnicity, education, poverty, urbanicity, smoking and obesity rates), was significantly higher in association with greater non-methane VOC emissions from compressor stations. Twelve individual VOCs were also associated with significantly higher adjusted mortality.

Payne et al, 2016, (2) found high methane readings in areas downwind of compressor stations during periods of air inversion. The study conducted sampling at 9 compressor stations, seven in Pennsylvania, and two in New York.

The data indicates that the areas downwind of compressor stations during periods with winds exceeding 3 meters per second will be exposed to methane plumes, and any other co-emitted pollutants released by compressor stations. Residents and properties downwind under prevailing wind conditions will likely be subjected to a disproportionate burden of contaminants from compressor stations, especially those closer to the station under light prevailing wind conditions. Conditions at night and during other low wind periods may result in particularly high methane burdens for residents and properties located downslope from compressor stations, especially during atmospheric temperature inversions.

The study concluded that the data indicate that compressor stations are likely sources of methane emissions and presumably co-emitted air contaminants, and can sporadically/episodically emit methane at relatively high levels.

University at Albany researchers (3) investigated health harms associated with chemical emissions from natural gas compressor stations in New York State. Between 2008 and 2014, 18 gas compressor stations (out of 74 compressors in the state) released a total of 36.99 million pounds of air pollutants, excluding methane and carbon dioxide. Thirty-nine of the chemicals released were human carcinogens.

The Federal Agency for Toxic Substances and Disease Registry (ATSDR)(4) released a report on air quality near a natural gas compressor station in Brooklyn Township, Susquehanna County, Pennsylvania, finding levels of fine particulate matter (PM_{2.5}) at levels that can damage human health in those with long- term exposure. Evaluating data from an 18-day EPA field air monitoring event, the report found that the average ambient 24-hour PM_{2.5} concentration observed at one residence (19 µg/m³) was higher than the nearest regional National Ambient Air Quality Standards (NAAQS) monitoring station (12.3 µg/m³) in Scranton, PA, over the same period. ATSDR concluded that there was evidence that long-term exposure to PM_{2.5} at the levels found can cause an increase in mortality, respiratory problems, hospitalizations, preterm births, and low birth weight. The agency said that in the short term, exposure could be harmful to sensitive populations, such as those with respiratory problems or heart disease. The agency recommended that sensitive individuals monitor air quality and limit activity accordingly, and that the PA DEP work to reduce other sources of PM and its precursors.

ATSDR, in collaboration with the EPA Region 3 Air Protection Division,(5) conducted an exposure investigation to evaluate exposures of residents living near the Brigich natural gas compressor station in Chartiers Township, Washington County, Pennsylvania. ATSDR concluded that, although exposure to the levels of chemicals detected in the ambient air was not expected to harm the health of the general population, “some sensitive subpopulations (e.g., asthmatics, elderly) may experience harmful effects from exposures to hydrogen sulfide and PM 2.5 [and] some individuals may also be sensitive to aldehyde exposures, including glutaraldehyde.” According to ATSDR, one of the study’s limitations was that the sampling “may not have adequately captured uncommon but significant incidents when peak emissions (e.g. unscheduled facility incidents, blowdowns or flaring events) coincide with unfavorable meteorological conditions (e.g. air inversion).” ATSDR recommendations included reducing exposures to the chemicals of concern to protect sensitive populations, continued collection of emissions data for long-term and peak exposures, and air modeling to better understand ambient air quality.

Schoharie County supervisors and medical professionals in 2015 (6) demanded comprehensive health impact assessments as a precondition for permitting natural gas pipelines and compressor stations.

The American Medical Association (AMA) in 2015 (7) adopted a resolution, “Protecting Public Health from Natural Gas Infrastructure,” that was based on a resolution adopted by the Medical Society of the State of New York. (See below.) The resolution states, “Our AMA recognizes the potential impact on human health associated with natural gas infrastructure and supports legislation that would require a comprehensive Health Impact Assessment regarding the health risks that may be associated with natural gas pipelines.”

The Southwest Pennsylvania Environmental Health Project, (8) as part of a literature review on the health impacts of compressor stations reported in 2015 that peak emissions of fine particles tended to occur during construction time, that day-to-day emissions during operational time can fluctuate greatly, and that a compressor blowdown typically represented the single largest emission event during operations. Hence, documentation of these fluctuations cannot be captured by calculating yearly averages. A blowdown is an intentional or accidental release of gas through the blowdown valve that creates a 30- to 60-meter-high gas plume. Blowdowns, which are used to release pressure, can last as long as three hours. The authors noted that blowdowns result in periods of high levels of volatile organic compound releases and that anecdotal accounts associate blowdowns with burning eyes and throat, skin irritation, and headache. There is neither a national nor state inventory of compressor station accidents, nor a body of peer-reviewed research on the public health impacts of compressor stations.

David O. Carpenter at University at Albany in 2014 found high levels of formaldehyde near 14 compressor stations in three states. In Arkansas, Pennsylvania, and Wyoming, formaldehyde levels near compressor stations exceeded health-based risk levels. The authors noted that compressor stations can produce formaldehyde through at least two routes: it is created as an incomplete combustion byproduct from the gas-fired engines used in compressor stations. It is also created when fugitive methane, which escapes from compressor stations, is chemically converted in the presence of sunlight. Formaldehyde is a known human carcinogen. Other hazardous air pollutants detected near compressor stations in this study were benzene and hexane. One air sample collected near a compressor station in Arkansas contained 17 different volatile compounds.

The Clean Air Council report prepared in January, 2013 (9) by an independent consulting firm to evaluate air quality impacts from the Barto Compressor Station in Penn Township, Lycoming County, Pennsylvania predicted “large exceedances” of the nitrogen dioxide (NO₂) 1-hour NAAQS. Researchers used allowable emissions in the PA DEP permit, the 2006-2010 meteorological data and the latest EPA modeling guidance for the model’s prediction. Three techniques were used, and for two of the techniques, NAAQS exceedances occurred within a mile of the plant. The report concluded, “NO₂ impacts from the Barto plant alone are very significant since its emissions cause large exceedances of the 1-hour NAAQS.”

A **Pittsburgh Post-Gazette** March 9, 2020 article found that residents living a quarter-mile from a compressor station in rural Washington County, Pennsylvania indicated that the persistent low-frequency sound from the station “gives them headaches and feels like torture.” The township does not regulate low-frequency noise. A member of the same family was recently diagnosed with multiple myeloma, a blood plasma cancer linked to benzene and other pollutants. This compressor station emitted 1.2 tons of benzene in 2018, “making it the third biggest source of the carcinogen in the seven-county southwestern Pennsylvania region,” according to data obtained from the Pennsylvania Department of Energy Emissions Inventory. Washington County has 40 compressor stations pushing gas through the pipelines.

Testimony at The National Press Club against the Federal Energy Regulatory Commission(10) described with great emotion a New York City Firefighter who responded to the Twin Towers during the 9/11 terrorist attack. He survived, but his lungs were damaged. His doctor told him that he would have to leave New York City due to air pollution in the city. He moved to a rural location in upstate New York. Shortly after moving he learned that a natural gas compressor station would be built nearby. His doctor told him he would have to move again.

The existing Transco compressor stations, and pipelines at this location have been discharging pollutants for many years. The Transco pipeline has been in operation since the late 1940’s. Transco Compressor Station 165 has been in operation since the early 1960’s. Transco Compressor Station 166 was built in 2015. They all leak, and emit a large number of toxic pollutants. They have been polluting for many, many years.

These pollutants in the gas stream are almost all heavier than air, heavier than carbon dioxide, and much heavier than methane, the primary constituent in natural gas. These heavier pollutants may have dropped out of the combustion emission discharge plume, the venting and blowdown emission plumes, and the fugitive leak plumes from the existing Transco compressor stations, and pipelines, and been deposited in the Chatham community.

These pollutants may have accumulated over time, and remain in the Chatham community. They may already be causing negative health outcomes, and environmental problems in the community that have not been accounted for.

The Lambert Compressor Station may also deposit pollutants into the Chatham community, and add to negative cumulative community public health, and environmental pollution impacts far into the future.

It is very important that an accurate assessment of existing pollution and health impacts in the Chatham community is completed prior to issuance of an air discharge permit for the Lambert Compressor Station.

This has not been done, and it would be unconscionable for DEQ to issue an air discharge permit for the Lambert Compressor Station without first determining if the Chatham community is already overburdened with negative public health issues, and environmental pollution after being subjected to pollution from Transco for over half a century.

The Chatham community is not a sacrifice zone. DEQ cannot turn a blind eye to this glaring omission in the permit process. To do so would be more than

negligent.

Ambient air quality has not been properly assessed.

No local air pollution sampling data has been made available for the Chatham community, even though local air quality may be significantly impaired from pollutant discharges from the nearby Transco compressor stations, and pipelines.

The Chatham community ambient air quality for CO, NO₂, PM 10, PM 2.5, and SO₂ was incorrectly assumed using sampling results from Roanoke, Virginia, and Guilford, North Carolina air monitoring stations. These cities are far removed from the Chatham community, and air quality is likely to be fundamentally different, due to different air pollution sources. To state that air sampling from Roanoke and Guilford is indicative of air quality in the Chatham community is absurd, and incorrect.

No local air sampling was conducted for VOC's, formaldehyde, or for radioactive radon-222, which is carried in natural gas transmission lines in concentrations of 4000 - 6000 pico-curies per liter. This concentration is based on air pressure inside the pipelines at about 100 times atmospheric pressure. Natural ambient air concentrations of radon are 0.4 pico-curies per liter. Pittsylvania County has already been ranked by EPA as being in the highest category for dangerous radon concentrations in homes.

Black powder from the interior of natural gas pipelines has been shown to contain high amount of radioactive lead-210, a byproduct of the radioactive decay of radon-222. This has been found as particulate matter in concentrations as high 17,000 becquerels per kilogram.

Transco and Lambert will carry different concentrations of these and other radioactive substances due to the varying geologic conditions at the extraction sites, and travel time, which influences the amount of radioactive decay, to the Chatham community.

See Addendum.

According to DEQ, Transco is currently conducting ambient air quality sampling, but no results are yet available. If and when this data is available it should be evaluated over an extended period of time, and under variable weather conditions in order to properly account for variable pollutant impacts to the community prior to Lambert air discharge permit consideration.

Ambient soil, or groundwater conditions for the Chatham community have not been properly assessed.

No local soil or water pollution sampling was completed for the Chatham community, even though deposition of toxic substances from air discharges from the existing Transco compressor stations and pipelines may have already contaminated the soil and groundwater.

No health assessments or testing have been completed for residents of the Chatham community.

No health assessments or testing have been completed for residents of the Chatham community.

Toxic substances emitted from the existing Transco compressor stations and pipelines for many years may already been inhaled and ingested by Chatham residents from repeated, and long term exposure. These substances may already be causing acute, and chronic negative health impacts in the Chatham community.

Additional pollution from the Lambert compressor station could exacerbate existing and long term negative public health impacts to Chatham residents from the nearby Transco compressor stations, and pipelines.

Actions needed for a reliable current public health and environmental assessment

Local soil, air, and groundwater sampling should be completed to determine the extent of pollution from the Transco compressor stations and pipelines, or other possible pollution sources. The sampling should be completed per EPA approved procedures, and be carried out by an independent qualified expert chosen by DEQ. Sampling should include CO, NO₂, PM 10, PM 2.5, SO₂, VOC's, formaldehyde, benzene, radon-222, and lead-210. Sampling should be conducted for a period of time that assures reliability of the findings in varying weather conditions. See Addendum

A community health assessment by the Virginia Department of Health to determine possible negative health impacts from the Transco compressor stations, and other possible pollution sources should also be completed for Chatham residents who chose to be included in the assessment.

DEQ should not issue an air discharge permit until these assessments are made, and ambient conditions are determined to be such that additional pollution discharges from the Lambert Compressor Station will create no negative environmental or public health impacts.

DEQ cannot allow Chatham Virginia to suffer a similar fate as Flint, Michigan

The Air Model Used to Predict Airborne Pollution From the Lambert Compressor Station is Not Reliable For This Facility

The following comments refer to the DEQ engineering analysis Section VII, Dispersion Modeling.

The air modeling that was used for the Lambert Compressor Station is not suitable for this facility, and may not accurately predict pollutant deposition, distribution, or concentration.

Heavier than air, and heavier than methane pollutants in the combustion exhaust emissions, in the blowdown emissions, and in leaks from the Lambert Compressor Station may drop out of the discharge plumes, and be deposited in, and accumulate in the Chatham community. The pollutant discharge plumes may also come into contact with the ground near the compressor station during certain weather conditions, including air inversions.

AERMOD Version 19191 was used to model the pollutant plumes that would be emitted to the air from the Lambert Compressor Station. Aermod is what is referred to as a Gaussian model.

There are a number of scientific articles that indicate that AERMOD modeling systems are not suitable to predict pollutant concentration, deposition, or distribution from the proposed Lambert Compressor Station.

In Volume 82, Number 10 of the Federal Register, dated January 17, 2017 under 40 CFR Part 51 the EPA issued a final rule revising guidelines on air quality models. (EPA -HQ-OAR-2015-0310; FRL-9956-23-OAR) RIN 2060-AS54. (11)

2.1 (i) of the rule states Gaussian plume models use a **steady-state** approximation, which assumes that over the model time step, the emissions, meteorology and other model inputs, are constant throughout the model domain, resulting in a resolved plume with the emissions distributed throughout the plume according to a Gaussian distribution. This formulation allows Gaussian models to estimate near-field impacts of a limited number of sources at a relatively high resolution, with temporal scales of an hour and spatial scales of meters. **However, this formulation allows for only relatively inert pollutants, with very limited considerations of transformation and removal (e.g., deposition), and further limits the domain for which the model may be used. Thus, Gaussian models may not be appropriate if model inputs are changing sharply over the model time step or within the desired model domain, or if more advanced considerations of chemistry are needed. “**

Emissions from the Lambert Compressor Station would not be steady state emissions. They would vary widely over time. They would vary during startup and shut down procedures, during variable air temperatures, during venting and blow down, during variable turbine use, during variable combustion load scenarios, and as the quantity of natural gas passing through the station varies, including the amount that is leaking from the facility.

Deposition of pollutants is a significant concern from Lambert emissions. As stated above, most of the pollutants carried in the gas stream, that would be discharged during blowdowns, venting, and leaks, and in combustion emission discharges are heavier than air, and much heavier than the methane in which they are initially entrained. They may deposit out of the emission plume in the Chatham community due to their significantly higher molecular weight.

Chemical reactions in the Lambert discharge plumes could also result in gaseous substances like sulfur dioxide and nitrous oxides reacting, and being reduced to solid, particulate matter that would also tend to drop out of the plume. AERMOD does not account for this change in the discharge plume. AERMOD only allows for inert, non reactive plume components in the air dispersion analysis.

Lakes Environmental (12) describes AERMOD as a **steady state model** for buoyant or neutrally buoyant plumes.

Gibson, Kundu, and Satish, 2013, (13) compared AERMOD predictions with actual sampling findings at various locations in Nova Scotia. They found mixed results in AERMOD accuracy, where in some cases **AERMOD greatly underestimated pollutant concentrations.**

Dresser and Huizer, 2011,(14) found **severe AERMOD underprediction** during unstable weather conditions.

DEQ is aware of the modeling shortcomings. **DEQ has advised that the AERMOD modeling used for the discharge of pollutants to the air from the Lambert Compressor Station does not predict the ultimate location, or deposition of the pollutants. DEQ further advised that they did not consider deposition in the modeling analysis. DEQ also advised that they do not know the final location of pollutants that will be discharged from the Lambert Compressor Station, and that the AERMOD modeling only estimates pollutant concentrations.**

Actions Needed to Determine the Deposition, Distribution, and Concentration of pollutants discharged to the Air From the Lambert Compressor Station.

Air modeling should be completed using a model that accurately predicts the deposition, distribution, and concentration of pollutants discharged from the Lambert Compressor Station during variable discharges, and under all weather conditions. The ADMS-3 model, an approved EPA alternate model, predicts wet deposition, dry deposition, gravitational settling, short term fluctuations in concentration, chemical reactions, radioactive decay, and gamma dose.

ADMS-3 modeling should be completed for the Lambert Compressor Station prior to consideration of permit issuance.

Leaks and Fugitive Emissions are Significantly Underestimated

The following comments are in response to the Draft DEQ Permit, Process Requirements, Number 7, Emission Controls for leaks, and the DEQ Engineering Analysis, Section II Compressor Fugitive Emissions, Section IV, Regulatory Review - Station Fugitives. Leaks and fugitive emissions from the proposed Lambert Compressor Station are significantly underestimated.

It is well known in the industry, and in the scientific literature that natural gas compressor stations leak and discharge large volumes of pollutants.

The predicted volume of leaks from the Lambert Compressor Station has been underestimated, and as a result, the predicted volume of pollutants discharged to the air in the Chatham community has been underestimated.

The DEQ engineering analysis for the proposed permit states that the volume of leak emissions was based on EPA emission factors (Protocol for Equipment Leak Emission Estimates" for oil and gas production operations, 11/95 (EPA-453 / R-95-017), Table 2-4, Page 2-15 and Interstate Natural Gas Association of America (INGAA) guidelines.

The EPA equipment leak estimates are now outdated. They are 26 years old. The use INGAA guidelines is an inherent conflict of interest, and may not be valid.

The draft permit, Section 7A states that fugitive leaks below 500 parts per million are not considered leaks. Under that scenario, and with a volume at the compressor station of 375,000,000 cubic feet per day it would be possible to have leaks up to 187,500 cubic feet per day that are not counted as leaks. This is unacceptable. Leaks are leaks. All leaks must be considered to accurately account for total volume of leakage, and total pollutant discharge.

More recent studies indicate significant leakage from compressor stations.

D.T. Allen, 2016 (15) found that gas transmission emissions exceed underground storage emissions by 23 to 1. He found that emissions from pneumatic controllers of valves (as found in compressor stations) continually or intermittently emit gas, making this the largest source of emissions along the gas supply chain.

Zimmerle et al, 2015 (16) found that approximately 30% of gas losses occur during transmission and storage, and pneumatic devices (as found in compressor stations) emit gas as part of their routine operation.

Subramanian et al, 2015 (17) found the largest fugitive emission sources were from compressor related equipment.

With the very large volume of gas passing through the Lambert Compressor Station, and the well known high rates of leakage from compressor stations, even a small percentage of leakage would constitute a large volume of leakage.

The previous federal administration rescinded voluntary methane reduction initiatives in the natural gas industry. Under the same administration, in September, 2020 the EPA removed all methane and VOC standards for natural gas compressor stations. Both of these actions are likely to further increase the volume of pollutant leakage from natural gas compressor stations, including leakage from the Lambert Compressor Station into the Chatham community.

Actions Needed to Accurately Estimate the Volume of Leaks and Fugitive Emissions

DEQ or the Virginia Air Pollution Control Board should form a task force to better understand, predict, and report on the volume of leaks and fugitive emissions, and resultant pollution from the Lambert Compressor Station. They should also seek consultation from an independent expert in this field.

Significant Pollution Sources From the Lambert Compressor Station Have Not Been Fully Assessed as a Result of Numerous Regulatory Waivers, Exemptions, and Loopholes

The following comments are in response to the various exemptions, waivers, and exclusions that are shown in the DEQ Engineering Analysis for the proposed Lambert Compressor Station. These exemptions, waivers, and exclusions leave the public health, and the environment vulnerable to pollutants that will be discharged to the air from the Lambert Compressor Station.

The numerous regulatory exemptions and waivers in the DEQ draft permit, and engineering analysis are very concerning. These legal loopholes allow significant pollutant discharges from the Lambert Compressor Station to be hidden from analysis, and hidden from the Chatham residents whom they will impact.

These regulatory exemptions and waivers have left a large hole in the public health safety net that leaves Chatham residents, and their environment exposed and vulnerable to dangerous toxins that will be discharged from the Lambert Compressor Station.

I will not address all of these regulatory gaps, but I will address several of them.

It is possible that these regulatory loopholes will allow more pollution to impact the Chatham community than the amount of pollution that will be reduced by regulation of the pollutants that are not subject to these loopholes.

Discharge of Radioactive Substances

There is no reference in the DEQ draft permit, the DEQ engineering analysis, or the information submitted by the applicant to radioactive substances in the gas stream that will be discharged from the Lambert Compressor Station. It is well known in the industry, and the scientific community that radioactive substances with significant public health and environmental concerns are carried in the natural gas stream in transmission lines, and compressor stations.

These include radioactive radon-222, which is carried in the natural gas stream at an estimated 4,000 - 6,000 pico-curies per liter, while compressed within transmission lines to 100 times atmospheric pressure. Natural air levels are generally around 0.4 pico-curies per liter, although they may already be much higher in the Chatham community due to ongoing radon-222 releases from the nearby Transco compressor stations.

According to the EPA, radon-222 causes 21,000 lung cancer deaths per year in our country. EPA has ranked Pittsylvania County at the highest level for existing radon levels, and assumes that all homes in Pittsylvania County have radon-222 levels above 4 pico-curies per liter. This requires that remedial action be taken to reduce radon levels in the home.

It is also well known that radioactive lead-210, bismuth-210, and polonium-210 are found in natural gas transmission lines and compressor stations. These dangerous radioactive substances form as radon-222 decays. Lead-210 and polonium-210 form highly radioactive scales inside pipes that carry natural gas. Lead-210 has also been found in black powder in natural gas transmission lines at concentrations of 500 to 17,000 Bq/Kg.

Radon-222 will be discharged from the Lambert Compressor Station, and It is likely that lead-210, polonium-210, and bismuth-210 will be discharged as particulate matter as well.

These are very dangerous substances, especially if ingested or inhaled. They may have accumulated in the Chatham community from fifty plus years of Transco discharges, and the Lambert Compressor Station would further exacerbate this public health threat.

See Addendum and references

Discharge of Methane

The primary component in the natural gas stream is methane. This will be discharged from the Lambert Compressor Station in large volumes.

Methane is a very potent greenhouse gas, and it contributes significantly to our ever growing climate emergency. It is much more potent than carbon dioxide. Methane levels in our atmosphere are already 2.5 times higher than they have been in the past 180,000 years. According to Alvarez, et al methane accounts for 60% of the planetary warming then does carbon dioxide.

DEQ's engineering analysis indicates that methane discharges of 972 tons per year of CO2 equivalent methane will be discharged.

Yet, these methane discharges are not regulated in any manner.

Discharge of All Greenhouse Gases/Climate Change

The application states that 25,000 tons of greenhouse gases per year will be discharged from the Lambert Compressor Station. I could not locate a separate discharge volume for carbon dioxide. Given the methane volume stated above, it is assumed that much of the greenhouse gas discharges will be carbon dioxide.

Carbon dioxide levels in our atmosphere have been between 180 ppm and 300 ppm for the past 180,000 years until starting to rise about 150 years ago. Our current level is around 415 ppm. Carbon dioxide persists in our atmosphere for centuries. Methane persists for decades. These extreme levels of greenhouse gases in our atmosphere will not be significantly reduced anytime in the near future, even if we stop discharging all of them today.

The last time that carbon dioxide levels were this high the sea level was about 50 feet higher than it is today, and temperatures were much hotter. This means that as our planet heats up from the newly higher carbon dioxide levels, all coastal cities would be destroyed, total land mass would be significantly reduced, crops would not grow, or produce far less, large areas of our planet would become uninhabitable, mass migration would cause world wide disruption and conflict, and extreme weather events including flooding, super hurricanes, and drought would become common place.

Climate change is by far the biggest environmental threat ever for humankind, and may cause more deaths than all previous wars combined.

Yet, the root cause of climate change, greenhouse gas emissions, and the very large amount of greenhouse gases that would be discharged from the Lambert Compressor Station are exempt from consideration in the air discharge permit. This is unacceptable.

Virginia has recently joined with 10 other states to form the Regional Greenhouse Gas Initiative to work cooperatively to reduce greenhouse gas emission, On March 26, 2021 Senator Mark Warner introduced bipartisan legislation to expand and support programs like the Regional Greenhouse Gas Initiative. Virginia has pledged to become carbon free by 2045.

And yet, as our climate increasingly turns against us, DEQ is considering an air discharge permit for the Lambert Compressor Station that completely discounts the very large amount of greenhouse gas that would be discharged.

This is a travesty, and an open door to the onrushing climate tragedy that we are facing.

The Lambert Compressor Station and the MVP Southgate Together Should be Considered a Single New Air Pollution Source

The Lambert Compressor Station is not a stand alone project. It is part of the MVP Southgate project. It is required to compress natural gas for the Southgate project. The MVP Southgate cannot exist without the Lambert Compressor Station, and the Lambert Compressor Station is not needed without the MVP Southgate. They are the same project, and should be regulated as a single new air pollution source.

The MVP Southgate will discharge large volumes of pollutants into our air. Numerous studies have shown that natural gas transmission lines, like the MVP Southgate leak significantly. The Lambert Compressor Station is capable of compressing 375,000,000 cubic feet of gas per day, and the MVP Southgate is capable of transporting that volume of gas. Based on both EPA and Alvarez, et al, the MVP Southgate would leak more than 1,000,000 cubic feet of methane and other pollutants in the gas stream into our environment. At a minimum, most of the methane would be leaked, or discharged to our air.

See Addendum.

Nevertheless, at this time, no air discharge permit is required for the MVP Southgate, or other natural gas transmission pipelines in Virginia.

Toxic Substances That Will Be Discharged Have Not Been Individually Assessed

Numerous other dangerous toxic substances that are carried in the natural gas stream, that will be discharged to the air from the Lambert Compressor Station have not been evaluated on an individual basis, and will not be separately sampled, although they all have varying toxicity, and varying impacts to the environment, and human health. These include benzene, benzoic acid, ethane, heptane, hexane, naphthalene, octane, pentane, propane, and toluene, and the dangerous radionuclides radon-222, lead-210, polonium-210, and bismuth-210.

See Addendum

This leaves the public health, and our environment exposed, and vulnerable to these dangerous substances.

Actions Needed For Pollutants that Will Be Discharged from the Lambert Compressor Station that Fall Under Regulatory Exemptions, and Have Not Been Fully Addressed By the DEQ Draft Permit

Regardless of these regulatory loopholes it is the responsibility of DEQ to protect Virginia citizens, the Chatham community, and the environment by addressing the discharge of these very dangerous substances to our air, and our environment.

DEQ should research radionuclides in the natural gas stream, and consult with the Virginia Radiation Board on the release of these dangerous substances to our environment prior to finalizing a decision on this permit.

DEQ and the Virginia Department of Health (VDH) should hold a public meeting in Chatham to explain to local residents why many pollutants that will be discharged into the Chatham community have not been fully addressed in the draft permit, and to offer advice as to how residents can best protect themselves from these pollutants. This should include advising residents of health symptoms that might be caused by exposure to pollutants discharged from the Lambert Compressor Station, so they can seek proper medical care, if warranted.

DEQ or VDH should also provide a weather alert system to notify Chatham residents of air inversions, or other weather conditions that could result in increased pollution to the Chatham community. The alert should indicate actions that residents can take to protect themselves, like closing windows, and curtailing outdoor activities.

Information regarding these issues should also be made available, and updated as necessary at the local library.

Since the waivers and exemptions in the regulations are approved by Virginia legislators and the Governor, DEQ should also advise members of the Virginia legislature and the Governor regarding the public health and environmental consequences of not fully addressing these pollutants.

Conclusion

DEQ does not have sufficient information to assess existing levels of pollutants in the air, soil, and water in the Chatham community from the Transco compressor stations, and other possible pollution sources.

DEQ does not have sufficient information to determine the health impacts to residents of the Chatham community from the existing Transco facilities, and other possible pollutant sources.

DEQ does not have sufficient information to assess ongoing pollutant discharges from the nearby Transco compressor stations.

DEQ does not have sufficient information to accurately predict pollutant discharges from the proposed Lambert Compressor Station.

DEQ does not have sufficient information to determine the cumulative public health and environmental impacts from further pollutant discharges from the Transco and Lambert compressor stations into the Chatham community, where existing pollutant levels and public health impacts have not been accurately determined.

DEQ should not issue an air discharge permit for the proposed Lambert Compressor Station.

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Addendum

Transmission Line and Compressor Station Leaks and Discharges To The Environment

Leaks and discharges from natural gas transmission lines, and compressor stations are common place, prevalent, and high volume.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) allows what they term non hazardous leaks from natural gas transmission lines to continue to leak without repair. (1)

Alvarez et al, in an article in Science Magazine in 2018 (2) found that natural gas transmission lines, like the MVP, lost 0.35% of their product during transmission and storage in 2015 through leaks and intentional venting discharges. These losses were somewhat higher than EPA's 2015 National Inventory for Greenhouse

Gas and Sinks, and the increase was attributed to higher losses from abnormal operating conditions.

EPA's 2017 National Inventory of Greenhouse Gases and Sinks (3) found that 10% of natural gas transmission and storage losses were from intentional releases, including blowdowns for pipe repair and maintenance, and routine compressor station blowdown releases. Applying that percentage to the Alvarez et al study finds that, 0.315% of total pipeline volume is lost by leakage, while an additional 0.035% is lost through intentional releases.

EPA's 2015 National Inventory for Greenhouse Gas and Sinks (4) found approximately 22% less losses during transmission and storage than did Alvarez et al.

D.T. Allen, 2016 (5) found that gas transmission emissions exceed underground storage emissions by 23 to 1. He found that emissions from pneumatic controllers of valves continually or intermittently emit gas, making this the largest source of emissions along the gas supply chain.

Balcolme et al, 2016 (6) found total losses along the supply chain range from 0.2% to 10%.

Littlefield, et al, 2017 (7) found a 1.7% loss from gas extraction to delivery, but stated that there are numerous knowledge gaps, and uncertainty in this area.

Zimmerle et al, 2015 (8) found that approximately 30% of gas losses occur during transmission and storage, and pneumatic devices emit gas as part of their routine operation.

Subramanian et al, 2015 (9) found the largest fugitive emission sources were from compressor related equipment.

Regardless of which study is more accurate, given the very large volume of gas transmitted through transmission lines, this is a very large volume of gas that is being released into our environment.

The MVP has been approved by FERC (10) to transport 2 billion cubic feet of natural gas per day (2 bcf/d). At an average loss rate of 0.35% per Alvarez, et al, the MVP would discharge 7,000,000 cubic feet of gas per day to our environment, when carrying 2 bcf/d. MVP has recently stated that they may increase volume to 2.5 bcf/d. This volume would result in the discharge of 8,400,000 cubic feet per day to our environment.

Leak locations may not be uniform over the entire pipeline. Leaks may be higher in some areas, and lower in other areas. The above figures represent an average of losses over the entire transmission line. It is likely that more leakage occurs at valve stations, metering stations, and compressor stations than at pipe welds, and through openings in the pipe walls.

Unfortunately, there is a scarcity of information regarding the percentages of leakage from each possible location. PHMSA has advised me that they do not know the extent or location of leaks from gas transmission lines. I filed a FOIA request with PHMSA (11) in March, 2020 for more information regarding leaks, but that request has not been honored as of 4/1/21.

Intentional releases of gas would be confined to valve station, metering station, and compressor station maintenance blowdown events.

The amount of leakage and discharges from the MVP, Southgate Extension and their associated compressor stations is expected to be similar to the findings stated above. Those expected leaks and discharges are high volume.

Radioactive Substances In The Natural Gas Stream

Naturally occurring radioactive substances are found deep in the earth, including areas of shale where hydraulic fracturing (fracking) is used to extract natural gas. Fracking extracts and concentrates these substances. They are brought from deep underground, where they are safe, to the surface, where they are dangerous to the public health and the environment.

Under a 1980's federal exemption to the Resource Conservation and Recovery Act (RCRA), streams of waste from oil and gas wells, including radioactive waste, are not required to be handled as hazardous wastes. (11A)

Radioactive substances cannot not be fully separated from the gas stream, and they are carried downstream through gas transmission pipelines, and compressor stations.

Due to significant volumes of leakage, and intentional releases from these pipelines, and compressor stations, persons, wildlife, and the environment in proximity to them are at risk for radiation contamination.

Many locations along the route of the Mountain Valley Pipeline (MVP), and Southgate Extension are already high in naturally occurring radioactive radon-222. (12) Radon-222 is carried in the gas stream, and leaks and intentional discharges from these pipelines could further increase the risk of radon contamination for citizens along the routes.

Radioactive scales and sludges containing radioactive lead-210 and radioactive polonium-210, which are decomposition products of radon-222, are also deposited as scales along the inside of the pipes, and in filtering materials at compressor stations, and other structures. (13)

Lead-210 is also present inside the pipes as particulate matter in dust, or black powder, which can also be released through leaks and intentional discharges. (14)

Radioactive bismuth-210 is also a decay product of radon-222, but it is unknown if it is part of the radioactive scales that form inside the pipes. (15)

Filtering devices in the pipes and compressor stations cannot filter all of the particulate matter, and it is likely that lead-210, and possibly polonium-210, and bismuth-210 are discharged to our environment through leaks, and compressor station combustion discharges.

The threat to public health, wildlife, and the environment from these radioactive substances has not been adequately studied, regulated, or mitigated.

The Federal Energy Regulatory Commission’s (FERC) environmental impact statement for the MVP does not address radiation threats from the pipeline, compressor stations, valve stations, and other equipment associated with the pipeline.

These threats are significant, and must be fully taken into account for, and mitigated in order to protect the public health, and the environment.

Properties of Radioactive Substances In the Gas Stream

The principle radioactive substances of concern in gas transmission lines are radon-222, lead-210, polonium-210, and bismuth-210. (16) These are byproducts of naturally occurring radioactive materials deep inside the earth, including radium-226, which is concentrated and extracted by high salt content in fracking fluids. Radium-226 decays to radon-222. Most of the radium-226 remains in wastewater associated with fracking, but radon-222, it’s decay product, and a gas, cannot be fully separated from the gas stream, and enters transmission lines, distribution lines, and associated structures.

Dangerous radioactive radon-222 that is carried in the gas stream decays to very dangerous radioactive lead-210, dangerous bismuth-210, and then extremely dangerous radioactive polonium-210, before eventually decaying to non radioactive lead. Radon-222, lead-210, bismuth-210, and polonium-210 are especially damaging to health if they are ingested, inhaled, or absorbed through the skin or eyes, since the radiation they release will cause damage from inside the body.

The radon-222 decay chain (as part of the Uranium decay chain) is as follows:

Radionuclide	Half life
Radon-222	3.82 days
Polonium-214	3.05 minutes
Lead-214	26.8 minutes
Bismuth-214	19.7 minutes
Polonium-214	0.16 mus
Lead-210	22 years
Bismuth-210	5 days
Polonium-210	138 days
Lead-206	Stable

Radon-222 (17)

Radon-222 is an odorless and colorless gas that is around 8 times heavier than air. It has a molecular weight of 222 gm/mol, compared to a weight of 29 gm/mol for air. It remains close to the ground, and diffuses into the stagnant air of crawl spaces and wells. It can seep into homes. It passes easily through soils, and can enter underground caves, passages, and voids in karst areas.

Radon-222 is inert, and does not react with other elements.

Exposure to radon-222 causes 21,000 deaths from lung cancer in the USA.

It has a half life of 3.8 days

Lead-210 (17)

Lead is an extremely toxic metal, even in its stable, non radioactive state.

It has a molecular weight of 210, and is around 7 times heavier than air.

The U.S. Agency for Toxic Substances and Disease Registry (ATSDR), which focuses on minimizing human health risks from hazardous substances, ranks non-radioactive lead second on their substance priority list, only behind arsenic.

Lead is included in the national ambient air quality standards at 0.15 micrograms per cubic meter in total suspended particles as a 3 month average.

Lead-210 can be taken into the body through inhalation, ingestion, and eye and skin contact.

It is a possible carcinogen, and causes multiple negative health impacts, including weakness, exhaustion, tremors, and convulsions. It targets the central nervous system, and kidneys.

It has a half life of 22 years.

Polonium-210 (17)

Polonium-210 is extremely toxic. One microgram is more than enough to cause death. If ingested it is rapidly distributed throughout the body, where it concentrates in the soft tissues, and the bloodstream.

It also has a molecular weight of 210, and is about 7 times heavier than air.

The Centers for Disease Control and Prevention states that it can be emitted into the atmosphere since it is a product of radon gas.

Although uptake by plants is small, it can be deposited on broad leaved plants, and concentrated if those plants are vegetables that are consumed, or tobacco, if it is smoked. It is possible that polonium-210 is one of the substances associated with lung cancer from smoking tobacco.

Polonium-210 has a half life of 138 days.

Bismuth-210 (17)

It is highly radio-toxic

Bismuth-210, along with Lead-210 has been found to accrue selectively in the brain proteins in Alzheimer's disease, and brain liquids in Parkinson disease.

Longterm exposure to dust may result in mental changes, nervousness, blood changes, lymphocytosis, and bone marrow depression

It may cause long lasting effects to aquatic life.

It also has a molecular weight of 210, and is about 7 times heavier than air.

Bismuth-210 has a half life of 5 days.

Radiation In The Mountain Valley and Southgate Gas Stream

The Marcellus shale formation, from which natural gas for the MVP, and Southgate Extension would be obtained, has the highest concentration of radioactive substances of all shale fields in our country. (18)

Samples of gas from 7 Marcellus Shale gas gathering locations in Pennsylvania found the highest concentration of radioactive substances in far southwest Pennsylvania. (19) This is the same area where the MVP would obtain its gas.

It is possible, therefore that radon-222, lead-210, bismuth-210, and polonium-210 radiation levels in the MVP, and Southgate Extension could exceed the levels found in other studies.

The transmission lines, distribution lines, and their associated structures regularly leak. The radioactive substances in the MVP and Southgate Extension pipelines would be leaked at valve stations, metering stations, compressor stations, pipe welds, and through small leaks in the pipes themselves.

Radon-222 in the gas stream is also intentionally released into the air during blowdown operations, including pipe cleaning blowdowns, and routine blowdowns at compressor stations.

Radon-222 gas is carried in the pipelines. Radon-222 has a half life of 3.8 days. Some of the radon in the transmission and distribution lines decays to lead-210 and this in turn decays to polonium-210, and is left as a radioactive scale or sludge along the inside of the pipes. However, due to the average speed of the gas

stream of about 10 miles per hour, much of the radon-222 continues intact through the entire transmission and distribution lines where it is leaked and discharged.

The gas stream in the MVP and downstream Southgate Extension would reach the terminus in about 1 1/2 days, resulting in less radon decay, and leaving more than 75% of the radon in the gas stream at the terminus.

Concentrations of Radiation in the Gas Stream

Radon-222 in Gas Transmission Lines - All Measurements in Pico-Curies Per Liter at Atmospheric Air Pressure

McArthur and Lemons found concentrations up to 120. (20)

Mitchell and Griffin, 2016 found 41 to 74, and a throughput weighted average of 54 from gas collected from Marcellus shale. (21)

The PA DEP study cited in FERC's ACP Environmental Impact Statement (EIS) for the Atlantic Coast Pipeline found 29 to 58 at 4 compressor stations. (22)

Based on these studies, it is reasonable to assume a concentration of radon radiation in the MVP, and Southgate Extension transmission lines of 40 - 60.

Radiation in Scales and Sludges Inside Gas Production, Processing, and Transportation Equipment - All measurements in Pico-Curies Per Gram

The Louisiana DEQ in 1989 found 100,000 (23)

The Oil and Gas Journal in 1990 found several thousand. This article also states that long lived radon decay products that will continue to increase in pipelines for over 100 years (24)

The International Atomic Energy Agency in 2003 found 27,000 (25)

The Pennsylvania Department of Environmental Protection in 2015 found 3,580 (22)

Based on these studies, it is reasonable to assume concentrations of lead-210 and polonium-210 radiation in the scales and sludges inside the MVP, and Southgate transmission lines. It is unclear what levels of radioactivity would be found in these transmission line scales at various locations along the transmission line.

Nevertheless, it is clear that the level of radioactivity in these scales will increase significantly over the long term if the scale is not removed. The MVP has no close out plan to remove the scale inside the pipes, or the pipes themselves after operations have ceased, and any scale inside will continue to increase in radioactivity. When the pipes eventually fail that radiation will be released to the environment.

Radiation in Dust Samples in Natural Gas Pipelines

Nowak and Jodlowski, 2019 found radiation levels of 13,515-459,510 pico-curies per kilogram in dust samples, or black powder in natural gas transmission lines. (26)

Radiation Exposure Pathways

The MVP, and Southgate Extension are underground pipes with facilities that include underground and above ground components.

Leakage and blowdowns from valve stations, compressor stations, and transfer stations would very likely discharge primarily to the atmosphere. Nevertheless these discharges would not dissipate, and some of the gas stream constituents would not remain airborne.

The primary constituent of the gas stream is methane, which has a molecular weight (mw) of 16, compared to the mw of air at 29. Therefore, methane would tend to rise in the air when discharged to the air. It would tend to move up and out of the ground to the air if discharged to the ground in an area that allows gas movement through the soil profile. However, if discharged to the ground in a karst area the methane may travel long distances underground through the voids in the karst, before finally rising through the soil column, or to the air through a sinkhole.

Many other constituents in the gas stream, including radon-222 (mw of 222), lead-210 (mw of 210), bismuth-210 (mw of 210) and polonium-210 (mw of 210) are much heavier than methane and the air, and would tend to separate from the methane once released into the environment. As the methane rises in the air or the soil, these constituents would tend to fall to the ground, if discharged into the air, or stay in the ground, if discharged to the ground.

It is also possible, but perhaps less likely, that leakage from valve stations, metering stations, and compressor stations may also be discharged to the ground through cracks or breaks in their underground vaults.

Leakage from the pipes and pipe joints would be discharged to the ground.

When released into our environment radioactive radon-222, lead-210, bismuth-210, and polonium-210 could contaminate the ground and groundwater, drinking water sources, nearby homes, vegetation, food crops, livestock, and wildlife.

In karst areas, the risk of contamination to the ground, groundwater, drinking water sources, homes, vegetation, food crops, livestock, and wildlife, including endangered species, is further increased, where voids allow the heavier than air radioactive elements to be concentrated underground, and be transported far from the pipeline through extensive karst networks.

All subterranean wildlife could be adversely impacted, including endangered species that inhabit underground locations, including the Indiana Bat, and the Northern Long Eared Bat, which inhabit caves.

Radon-222

Of particular concern are radon-222 leaks, which can then seep into homes, many of which are already high in naturally occurring radon contamination. The EPA estimates 21,000 deaths per year in our country from lung cancer from radon-222 inhalation. Many homes along the pipeline routes already have radon-222 levels that are unsafe, and above the EPA action level of 4 pico-curies per liter (pCi/L). (27)

Radon-222 leaks and seepage into these homes could further increase radon-222 levels, and the threat of lung cancer to residents of those homes.

EPA has ranked counties according to radon-222 zones regarding the amount of naturally occurring radon-222 that is expected in homes in that county. These rankings are as follows:

Zone 1 > 4 pCi/L The home needs to be fixed to reduce radon levels

Zone 2 2-4 pCi/L The home should consider fixes to reduce radon levels

Zone 3 < 2 pCi/L No fix is recommended

The MVP would pass through the following counties and their EPA radon-222 zone is shown: (28)

WV

Wetzel - 2

Harrison - 2

Lewis - 2

Braxton - 2

Webster - 2

Nicholas - 2

Greenbriar - 1

Summers - 1

Monroe - 1

VA

Giles - 1

Montgomery - 1

Roanoke - 1

Franklin - 2

Pittsylvania - 1

The Southgate Extension would pass through the following counties and their EPA radon-222 zone is shown:

VA

Pittsylvania - 1

NC

Rockingham - 1

Alamance - 2

These county EPA radon-222 designations indicate existing conditions, before the possible addition of radon-222 to the homes from leaks and discharges from

the MVP, Southgate Extension, and their compressor station.

These EPA records indicate that most of the Virginia counties through which these pipelines would pass, have a predominance of homes that already have radon-222 levels where action is needed to protect the health of the residents. Additional radon-222 from leaks and discharges would add to the risk for these residents.

Most of the counties in West Virginia through which these pipelines would pass have homes that already have radon-222 levels where residents should consider fixing the home to reduce radon-222 levels. Additional radon-222 from leaks and discharges would add to the risk to these residents.

Most of the counties in North Carolina with the exception of Rockingham and Alamance Counties, have homes with radon-222 levels below the level where action is needed to reduce radon-222 levels. However, additional radon-222 seepage into these homes could increase radon-222 levels where action would be needed to fix the home to reduce radon levels.

It is not known if additional radon-222 discharges to the ground from the pipelines would increase the amount of radon-222 in nearby homes, but the potential for that to occur is certainly present, especially in karst areas.

It is also possible that radon-222 leaks and intentional releases to the atmosphere would settle back to the earth near the source, where the radon-222 could enter the homes. Radon-222 is heavier than air and is likely to separate from the methane in those leaks and releases, and drop back to the ground near the source. The radon-222 will also decompose into lead-210, bismuth-210, and polonium-210, and these radionuclides may accumulate near the source as well.

These concerns are especially worrisome near compressor stations, where regularly scheduled blowdowns emit large amounts of gas containing radon-222, and likely particulate matter containing lead-210, bismuth-210, and polonium-210.

Radon-222, lead-210, bismuth-210, and plutonium-210 could also enter the groundwater and be drawn into public and private drinking water sources. Radon-222 cannot be filtered from these drinking water sources.

Radon-222 from natural gas also enters homes and structures where natural gas is used. Studies vary in their findings of the increased risk of lung cancer death from this use of natural gas. Various factors affect the risk, including the amount of gas burned, the size of the structure, the rate of air circulation from outside, whether the burned gas is vented to the outside or unvented, and the hours per day that the home or facility is occupied.

Radioactive Scales and Sludges

Another source of radiation exposure are the scales and sludges, including lead-210 and plutonium-210, that are deposited along the inside of the pipelines as radon-222 decomposes.

Some of these are removed during pipe maintenance operations, and they must be disposed of properly in order to protect the public, and industry workers. However, due to the federal RCRA exemption for these materials they do not have to be treated under hazardous waste requirements. The ultimate disposal of these radioactive substances has not been covered in FERC's environmental impact statements.

Radioactive scale along the inside of the pipes, and possibly radioactive sludge will remain in the pipes after the project is completed, and gas is no longer being transported. Neither the MVP, nor the Southgate Extension has a close out plan that requires removal and proper disposal of these radioactive substances. It is likely that the pipes will be left in place with this radioactive material inside them.

As long as this material is left in the pipes it may not generally be a public health problem. However due to the long half life of lead-210, the amount of radioactive material in the pipes could increase for over 100 years.

If the pipes are left in place they will eventually fail and collapse, releasing this radiation to our environment.

Failure of FERC's MVP Environmental Impact Statement to Adequately Assess Radiation Risks

FERC's environmental impact statement (EIS) for the MVP fails to adequately assess radiation risks to the public and the environment, and I believe that failure is a violation of the National Environmental Policy Act (NEPA).

FERC has failed to consult with federal agencies with expertise on radiation issues. The federal agencies with expertise in radiation protection are the Environmental Protection Agency (EPA), The Nuclear Regulatory Commission (NRC), and the Department of Energy (DOE). None were consulted. The MVP EIS includes some general EPA information regarding radon-222, but there is no evidence of FERC seeking out EPA guidance specific to MVP radiation issues.

The MVP EIS only addresses radon-222 exposure to persons using natural gas in their homes.

The MVP EIS does not cover other radionuclides in the gas stream, including lead-210, bismuth-210, and polonium-210 as many research studies have found.

It does not cover the large ongoing leaks and discharges of radon-222, lead-210, bismuth-210, and polonium-210 that will occur along the MVP, as many research studies have found.

It does not cover the radioactive scales and sludges that will accumulate inside the pipes, as further research studies have found.

It does not cover waste disposal issues when these scales and sludges are removed from the pipes, and from filters during routine maintenance operations.

It does not cover the radioactive scales in the pipes that may also be left in the ground after project completion.

It does not include a close out plan that requires adequate clean up of radioactive materials remaining in the pipes.

Needed Actions to Protect The Public Safety

- Store all gas that would be transported in the MVP, and Southgate Extension for at least 25 days to remove 99% of the radon-222 prior to transport. This would eliminate virtually all radon-222 gas releases, particulate lead-210, bismuth-210, and polonium-210 releases, and lead-210, and polonium-210 scales and sludges inside the pipeline

If the above storage is not accomplished:

- Notify the public near the route of the pipelines of the possible threat from radioactive substances.
- Require pipeline companies to pay for tests for radon-222 levels in homes near the pipelines prior to gas transport, and then at one year intervals for five years following initiation of gas transport. If there is a significant increase in radon-222 levels the pipeline company should pay for remediation to reduce radon-222 levels to pre construction levels.
- Require the same tests for public and private drinking water sources near the pipelines.
- Require the same tests for soils near the pipelines.
- Require discharge permits for the release of radon-222, lead-210, and polonium-210 from the pipelines, and their associated structures.
- Require ongoing testing for radioactive substances in the gas stream prior to it entering the transmission lines, and where gas is transferred from transmission lines to distribution lines. Set limits on those radioactive substances.
- Require disposal of sludges and scales from pipe and equipment clean out operations to be carried out in accordance with requirements for other radioactive wastes.
- Require removal of all pipes, scale, and sludges at project close out, and require disposal in accordance with requirements for other radioactive wastes.

Non Radioactive Pollutants in The MVP Natural Gas Stream

Natural gas that is transported through transmission lines, like the Mountain Valley Pipeline (MVP) is primarily methane, but other substances are present as well. Most of these substances, including methane, are harmful to human health and the environment. Due to ongoing leaks and intentional discharges from these transmission lines and their aboveground structures, these substances are discharged in large volume into our environment, where they pollute our air and water, and threaten our health.

Natural gas transmission lines, like the MVP, routinely leak. The Pipeline and Hazardous Material Safety Administration (PHMSA) allows what they term nonhazardous leaks to continue. The volume of ongoing leakage from the MVP is likely to be very high, due to the large volume of gas it would transport. Pollution threats to human health and the environment are increased where the MVP would travel through karst areas. Pollutants that are leaked into karst voids could quickly enter private drinking water wells and springs, and could travel long distances in a short period of time.

The Federal Energy Regulatory Commission's (FERC) final environmental impact statement (FEIS) for the MVP does not adequately address these threats to public health and the environment.

These threats should be further studied, addressed, and eliminated prior to the MVP being placed into operation.

Specific Non Radioactive Pollutants in Natural Gas Stream

The largest constituent carried in natural gas pipelines is methane. There are other constituents as well, including liquids that can precipitate out of the gas. Most of these can result in environmental damage when released, and can be detrimental to human health and wildlife.

The percent of constituents carried in natural gas pipelines can vary considerably according to where the natural gas is obtained. Almost all of these constituents can be considered pollutants, and many are toxic.

Methane volume in the natural gas stream is generally between 90% and 95%, but can be as low as 60%. Other pollutants include ethane, propane, butane, pentane, hexane, heptane, octane, hydrogen sulfide, and aromatic chemicals, including benzene, toluene, benzoic acid, and naphthalene.

Enbridge Gas, Inc. lists the following typical analysis of their natural gas, sourced from the United States and Canada. (29)

Component	Typical Analysis (%)	Range (%)
Methane	93.9	78.0 - 97.0
Ethane	4.2	1.5 - 9.0
Propane	0.3	0.1 - 1.5
Iso - Butane	0.03	0.01 - 0.3
Normal - Butane	0.03	0.01 - 0.3
Iso - Pentane	0.01	trace - 0.04
Normal - Pentane	0.01	trace - 0.04
Hexanes Plus	0.01	trace - 0.06
Nitrogen	1.0	0.2 - 5.5
Carbon Dioxide	0.5	0.05 - 1.0
Oxygen	0.01	trace - 0.1
Hydrogen	trace	trace - 0.02

Croft Production Systems lists the following components of natural gas and their range of percentage in the gas stream. This indicates the variability in natural gas constituents based on where the gas is sourced. (30)

Component	Range (%)
Methane	60 - 90
Ethane	0 - 20
Propane	0 - 20
Butane	0 - 20
Carbon Dioxide	0 - 8
Oxygen	0 - 0.2
Nitrogen	0 - 5
Hydrogen Sulfide	0 - 5
Rare Gases	0 - 2

Benzene is also carried in natural gas pipelines at around 0.1%

Negative Impacts of Pipeline Pollutants

All of the following pollutants carried in gas pipelines have negative health and environmental impacts.

The pollutants have carcinogenic, mutagenic, and toxic properties. They negatively impact respiration, and the central nervous system, cause cardiac arrhythmia, displace oxygen, and cause toxicity to aquatic life, with long lasting impacts. There are other negative impacts, as shown below. (31)

The following information was obtained from the National Institutes of Health

Benzene - C₆H₆

Heavier than air

Less dense than water and slightly soluble in water, floats on water

Flammable

Environmental contaminant

Toxic, carcinogenic, mutagenic

Coma and death possible

May be fatal if swallowed and enters airways

Damages bone marrow and central nervous system

Chronic exposure linked to oxidative stress and leukemia

OSHA permissible limits 1 PPM for 8 hours and 5 PPM for 15 minutes NIOSH permissible limit 0.1 PPM for 10 hours

Benzoic Acid - C₆H₅CO₂H

Anti-fungal agent of relatively low concern

Butane - C₄H₁₀

Heavier than air

Extremely flammable

Immediately dangerous to life and health

Sudden death when inhaled at high concentrations

Central nervous system impacts

10 minute exposure at 1% causes drowsiness May cause cancer and genetic defects

OSHA permissible limit 800 PPM for 8 hours NIOSH permissible limit 800 PPM for 10 hours

Ethane - C₂H₆

Asphyxiant that can cause death when it displaces air

Heavier than air and may displace Oxygen in low places

Very high mobility in soil

Extremely Flammable

When mixed with Chlorine Dioxide it always explodes spontaneously

Heptane - C₇H₁₆

Heavier than air

May explode in enclosed area

Inhalation irritant to respiratory tract causing coughing and difficulty breathing

May cause impacts to central nervous system

If swallowed, enters airways, and could result in aspiration pneumonitis

Defats the skin, which may cause dryness and cracking

OSHA permissible limit 500 PPM for 8 hours

NIOSH permissible limits 85 PPM for 10 hours, and 750 PPM is immediately dangerous to life or health

Hexane - C₆H₁₄

Heavier than air

Highly flammable and explosive

Causes peripheral polyneuropathy and testicular atrophy

Irritates eyes, nose, and respiratory tract

Inhalation causes respiratory tract irritation, cough, mild depression, and cardiac arrhythmia Aspiration causes severe lung irritation, coughing, pulmonary edema, and excitement followed by depression

Ingestion causes nausea, vomiting, swelling of the abdomen, headache, depression Associated diseases and disorders - Crohn's Disease and ulcerative colitis

OSHA permissible limit 500 PPM for 8 hours

NIOSH permissible limit 50 PPM for 10 hours

Hydrogen Sulfide - H₂S

Highly flammable

Heavier than air

Very toxic by inhalation

Deadens smell, victims unaware of presence until it is too late

Death or permanent injury can occur after short exposure to small quantities

Toxic by all routes including inhalation, ingestion, and absorption

Inhalation may cause lung edema and long term chronic bronchitis

Causes ulceration of the skin, conjunctivitis, inflammation of nasal mucosa, shortness of breath, and trachibronchitis

May cause effects on central nervous system

OSHA permissible limit 10 PPM for 10 minutes

NIOSH permissible limit 10 PPM for 10 minutes

100 PPM is immediately dangerous to life and health

Methane - CH₄

Asphyxiant that can cause death when it displaces air

Lighter than air

Extremely flammable Greenhouse gas

Naphthaline - C₁₀H₈

Carcinogenic agent

Much heavier than air

May be associated with an increased risk in developing laryngeal and colorectal cancer. Environmental contaminant

Skin exposure must be avoided

Vapors may be toxic

Exposure associated with hemolytic anemia, liver damage, neurological system damage, retinal hemorrhage, and cataracts.

Denser than water and insoluble in water

Lethal dose 5 - 15 grams for adults, and 2 grams within 2 days for a 6 year old child.

OSHA permissible limit 10 PPM for 8 hours

NIOSH permissible limit 10 PPM for 10 hours, or 15 PPM for 15 minutes

Octane - C₈H₁₈

Heavier than air

Less dense and insoluble in water, floats on water

Highly flammable

Very toxic to aquatic life with long lasting effects - acute hazard

Produces irritating vapor

Inhalation of concentrated vapor may cause irritation of respiratory tract, depression, and pulmonary edema

May be fatal if swallowed and enters airways

Harmful in contact with skin, causing skin irritation

Serious eye irritation

Aspiration causes severe lung irritation, rapidly developing pulmonary edema, and central nervous system excitement, followed by depression

OSHA permissible limit 500 PPM for 8 hours

NIOSH permissible limit 75 PPM for 10 hours

Pentane - C₅H₁₂

Heavier than air

Highly flammable and explosive

Asphyxiant

Toxic to aquatic life with long lasting effects

Inhalation causes drowsiness and dizziness

Very high concentrations produce narcosis and depression of the central nervous system Aspiration into lungs can produce chemical pneumonitis and/or pulmonary edema Causes irritation of the eyes, skin, nose, dermatitis, nausea, and unconsciousness Lowest published human inhalation lethal concentration 130 mg/cubic meter

Lethal concentration mouse inhalation 325 mg/cubic meter

OSHA permissible limit 1000 PPM for 8 hours

NIOSH permissible limit 120 PPM for 10 hours

Propane - C₃H₈

Asphyxiant that can cause death when it displaces air

Heavier than air and may displace Oxygen in low places

Extremely flammable

Concentrations of greater than 10% can cause dizziness in a few minutes

Concentrations of 1% can cause dizziness in 10 minutes

OSHA permissible limit 1,000 PPM for 8 hours

NIOSH permissible limit 1,000 PPM for 10 hours

Lowest published lethal concentration inhalation by dog - 180,000 PPM for 5 minutes, death from cardiac arrhythmias

Toluene - C₆H₆CH₃

Heavier than air

Less dense than water and insoluble in water, floats on water

Substance of very high concern

Vapors irritate eyes and upper respiratory tract, and cause dizziness, headache, anesthesia, and respiratory arrest

Liquid irritates eyes, and causes drying of the skin

Aspiration causes coughing, gagging, distress, and rapidly developing pulmonary edema Ingestion causes vomiting, griping, diarrhea, and depressed respiration

OSHA permissible limit 200 PPM for 8 hours

NIOSH permissible limit 100 PPM for 10 hours, and 150 PPM for 15 minutes

All of these polluting chemicals are likely to enter confined karst underground environments, groundwater, and surface water, along, and near the current proposed route of the MVP. Each of them has specific negative impacts to the the public health, the environment, and to living organisms, including endangered species. In combination, these pollutants pose an even more significant threat.

Pollution Exposure Pathways

The MVP is an underground pipe with facilities that include underground and above ground components.

Leaks and intentional discharges from valve stations, compressor stations, and transfer stations would very likely discharge primarily to the atmosphere. Nevertheless these discharges would not dissipate, and some of the gas stream constituents would tend to separate from the discharge plume and fall to the ground.

The primary constituent of the gas stream is methane, which has a molecular weight (mw) of 16, compared to the mw of air at 29. Methane would rise in the air when discharged to the air. It would tend to move up and out of the ground to the air if discharged to the ground in an area that allows gas movement through the soil profile. However, if discharged to the ground in a karst area the methane may travel long distances underground through the voids in the karst, before finally rising through the soil column, or through a sinkhole, or other opening to the surface.

Many other constituents in the gas stream, are much heavier than methane, and heavier than air. These substances would tend to separate from the methane once released into the environment. As the methane rises in the air or the soil, these substances would tend to fall to the ground, if discharged into the air, or stay in the ground, if discharged to the ground.

It is also possible, but perhaps less likely, that leakage from valve stations, metering stations, and compressor stations may also be discharged to the ground through cracks or breaks in their underground vaults. Most of these leaks, however, would be to the air

Leakage from the pipes and pipe joints would be discharged to the ground.

When released into our environment these substances could contaminate the air, the ground, groundwater, drinking water sources, nearby homes, vegetation, food crops, livestock, and wildlife.

In karst areas, the risk of contamination to the ground, groundwater, drinking water sources, homes, vegetation, food crops, livestock, and wildlife, including endangered species, is further increased, where voids allow the substances that are heavier than air to be concentrated underground, and be transported far from the pipeline through extensive karst networks. All subterranean wildlife could be adversely impacted in karst areas.

Pathways of Natural Gas Pollutants from Pipeline to Karst

The MVP is a 42 inch diameter pipeline that would be buried underground. On average, the top of the pipe would be around 6 feet under the surface of the ground, and the bottom of the pipe would be 9 to 10 feet under the surface. Compacted soil would cover the pipe to that depth. Gas in the pipeline would be pressurized more 100 times greater than atmospheric pressure. Due to the very large difference in pressure inside and outside of the pipe, leaks and intentional discharges would be constantly forced out under high pressure.

Renowned karst expert and hydrogeologist Christopher Groves points out that caves and karst areas are interconnected to a greater extent than previously thought, and pollutants can travel rapidly through them. He also points out that pollutants can enter karst aquifers not only through sinkholes and sinking streams, but through diffuse infiltration, or diffuse autogenic recharge, through highly permeable bedrock covering large areas, with little filtering. (32)

Since the pipe will be covered with 6 to 10 feet of compacted soil, the pressurized leaks will flow along the path of least resistance, and in many cases enter karst voids and caves, rather than discharge to the atmosphere. There are three possible pipeline pollutant pathways to the karst voids and caves.

- 1 - Through interconnected karst passages, no matter how small, in the immediate area of the pipe leak.
- 2 - By following the outside of the pipe along voids around the pipe created by subsurface water flow and inherent difficulty in completely compacting soils immediately adjacent to a large 42 inch diameter pipe, and then entering karst voids and caves through an interconnected karst passage.
- 3 - By diffuse infiltration, either at the leak location, or along the voids in the ground along the pipe.

Once the pollutants reach the karst voids and caves, they could accumulate and concentrate within these confined spaces.

FERC's MVP Environmental Impact Statement (EIS) Inaccuracies Regarding Impacts of Pipe Pollutant Leaks

FERC's EIS (12) is severely deficient regarding pipeline leaks to karst. FERC's Environmental Impact Statement (EIS) for the MVP states that there is little chance of pipeline operations contaminating groundwater. It goes on to state that since methane is lighter than air it dissipates rapidly causing little impact to karst, caves, and groundwater.

These FERC statements do not accurately assess the negative impacts of MVP pipe leaks to subterranean karst areas. The following is a summary of how the EIS is not accurate in this regard:

- The EIS only addresses Methane, and none of the other numerous polluting substances that would be leaked from the pipe.
- Even though methane is lighter than air, it would be discharged from leaks in the pipe 6 to 10 feet underground. It may not migrate up through the soil profile to the atmosphere. The compacted earth above the pipe may prevent the methane from reaching the atmosphere. Instead, the methane could follow the path of least resistance, and be drawn into the many nearby interconnected karst passages and voids, or enter the karst passages and voids by diffuse infiltration through permeable material.
- Barometric pressure differences would have little or no impact on methane being drawn into karst, because the leaks may be effectively blocked from the atmosphere by the 6 to 10 feet of fill over the pipe. Regardless of the barometric pressure, methane, and other gas stream pollutants could be drawn into underground voids in the karst.
- Inspections of the trench for openings to karst as described in the karst mitigation plan will not adequately insure that all pathways from the trench to karst voids are found and sealed due to the following factors:
 - Openings to karst may be too small to be located and sealed during this massive construction project, which is planned on slopes exceeding 60% under very adverse conditions, and with much loose material in the trench, making observation of openings extremely difficult. The MVP has stated that they plan to continue construction throughout the winter, and when the ground is covered with snow. Construction workers, or even karst specialists, will not be able to find all openings to karst, or even a reasonable number of them, under these adverse conditions. Nor will they be able to locate and somehow seal permeable material in the base of the trench that would allow leaked pollutants to enter the karst voids. These pathways to karst will remain after the pipe is in the ground and carrying a very large volume of gas. Leaks of pollutants in the gas stream will surely enter the subterranean karst environment.
- The EIS incorrectly states that the likelihood of a gas release is low. All evidence, as indicated by EPA, the Alvarez study, and others, shows that these very large cumulative releases are routine, pervasive, and ongoing.
- The EIS states that the pipeline will be monitored, but PHMSA regulations only require patrols and leak detection inspections once every 15 months. Regardless, the chances of a patrol or leak detection inspection finding an underground leak to karst is extremely rare.

The EIS is correct in one sense regarding pipeline leaks. It states that methane is an asphyxiate that displaces oxygen and is hazardous in confined spaces. This statement is directly applicable to methane discharges to karst voids.

Suggested Actions To Protect The Public Health And The Environment

Require the MVP to test drinking water supplies, including private wells and springs in proximity to the route, for substances that could be carried in the gas stream. This should be done prior to gas being sent through pipe, and at one year intervals thereafter.

Require the MVP to fully compensate property owners whose drinking water sources have been contaminated by these substances.

Require techniques to remove or substantially reduce these substances, except for methane, from the gas stream.

Require ongoing testing of the gas stream to determine the percentage of these substances in the gas stream.

Do not allow gas with levels of these substances above safe levels to be transported through these pipelines.

Require increased inspections

Require that all pipeline leaks be promptly repaired.

Addendum References

- 1) 49 CFR 192.711
- 2) Alvarez, et al, Environmental Defense Fund, Science Magazine, July 13 , 2018

- 3) EPA 2017 National Inventory of Greenhouse Gas Emissions and Sinks
- 4) EPA 2015 National Inventory of Greenhouse Gas Emissions and Sinks
- 5) David T. Allen, Journal of Air and Waste Management
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William F. Limpert
wflimpert@gmail.com
 4012B Garfield Road
 Smithsburg, MD 21783
 301-416-0571

Virginia Department of Environmental Quality
901 Russell Drive
Salem, Virginia 24153
Attn: Anita L. Walthall
Air Permit Writer

Re: Comments on Proposed Air Discharge Permit for the Proposed
Lambert Compressor Station

April 5, 2021

Dear Ms. Walthall:

I hereby submit comments in opposition to the Virginia Department of Environmental Quality draft air discharge permit for the proposed Lambert Compressor Station at 987 Transco Road, Chatham, VA 24531. The applicant is Mountain Valley Pipeline, LLC 21652.

I am commenting as an individual.

William F. Limpert
wflimpert@gmail.com
4102B Garfield Road
Smithsburg, MD 21783
301-416-0571

Summary

The Virginia Department of Environmental Quality (DEQ) should not issue an air discharge permit for the proposed Lambert Compressor Station.

DEQ lacks sufficient information to determine the extent of pollution and public health impacts that already exist in the Chatham community from the nearby Transco compressor stations, and other possible pollution sources. DEQ also lacks sufficient information to satisfactorily determine the extent of pollution and public health impacts to the Chatham community that would occur from pollutant discharges from the proposed Lambert

Compressor Station.

I hereby request a public hearing before the full Air Pollution Control Board in order for the Board to hear directly from concerned citizens regarding the threat to public health and the environment from the proposed Lambert Compressor Station. I also request that the hearing provide remote access for commenters, and that written comments can be made directly to the Board for their consideration.

I have an interest in this issue as I am concerned about the public health and environmental consequences of pollutant discharges from the Lambert Compressor Station, especially to residents of the Chatham community.

I also have an interest in this issue because, if built, the Lambert Compressor Station will emit large volumes of methane, carbon dioxide, and other greenhouse gases into our atmosphere far into the future, and further exacerbate our climate emergency.

I have added an Addendum at the end of this report that provides supporting information and references for some of my comments. The Addendum contains documentation from reports that I wrote for the Mountain Valley Pipeline (MVP) and Southgate Pipelines. It contains information that is pertinent to air pollutant discharges from the proposed Lambert Compressor Station, since the compressor station would carry and discharge the same and similar pollutants as the MVP and Southgate.

My comments will show that:

Current public health conditions, and the extent of pollution to the air, soil, and water at the site, and in the Chatham community have not been properly assessed.

DEQ does not have adequate information to satisfactorily determine if permit issuance would comply with Virginia law, negatively impact the public health, or pollute the air, soil, or water.

The air modeling that was used is not reliable for this facility.

Leaks, fugitive emissions, and resultant pollution are underestimated.

The public health and environmental impacts of many pollutants that would be discharged have not been satisfactorily assessed due to numerous regulatory waivers.

Existing Community Public Health and Environmental Conditions at the Site and In the Local Community Have Not Been Satisfactorily Assessed

The following comments are in response to Section I of the DEQ engineering analysis for site suitability. A satisfactory site suitability assessment has not been completed for the proposed Lambert Compressor Station.

Although it is well known that many of chemicals carried in the natural gas stream are detrimental to human health and the environment, there is a scarcity of studies that assess public health impacts to communities near natural gas compressor stations. There are even less studies that have sampled the air, water, and soil for the many pollutants that are discharged from natural gas compressor stations in and around the local communities where these compressor stations are located.

However, several recent studies indicate significant concerns.

Hendryx et al, 2020 (1) conducted a county-level ecological study, using VOC emission data from the 2017 National Emissions Inventory, and found that total age-adjusted mortality, controlling for covariates (race/ethnicity, education, poverty, urbanicity, smoking and obesity rates), was significantly higher in association with greater non-methane VOC emissions from compressor stations. Twelve individual VOCs were also associated with significantly higher adjusted mortality.

Payne et al, 2016, (2) found high methane readings in areas downwind of compressor stations during periods of air inversion. The study conducted sampling at 9 compressor stations, seven in Pennsylvania, and two in New York.

The data indicates that the areas downwind of compressor stations during periods with winds exceeding 3 meters per second will be exposed to methane plumes, and any other co-emitted pollutants released by compressor stations. Residents and properties downwind under prevailing wind conditions will likely be subjected to a disproportionate burden of contaminants from compressor stations, especially those closer to the station under light prevailing wind conditions. Conditions at night and during other low wind periods may result in particularly high methane burdens for residents and properties located downslope from compressor stations, especially during atmospheric temperature inversions.

The study concluded that the data indicate that compressor stations are likely sources of methane emissions and presumably co-emitted air contaminants, and can sporadically/episodically emit methane at relatively high levels.

University at Albany researchers (3) investigated health harms associated with chemical emissions from natural gas compressor stations in New York State. Between 2008 and 2014, 18 gas compressor stations (out of 74 compressors in the state) released a total of 36.99 million pounds of air pollutants, excluding methane and carbon dioxide. Thirty-nine of the chemicals released were human carcinogens.

The Federal Agency for Toxic Substances and Disease Registry (ATSDR) (4) released a report on air quality near a natural gas compressor station in Brooklyn Township, Susquehanna County, Pennsylvania, finding levels of fine particulate matter (PM_{2.5}) at levels that can damage human health in those with long-term exposure. Evaluating data from an 18-day EPA field air monitoring event, the report found that the average ambient 24-hour PM_{2.5} concentration observed at one residence (19 µg/m³) was higher than the nearest regional National Ambient Air Quality Standards (NAAQS) monitoring station (12.3 µg/m³) in Scranton, PA, over the same period. ATSDR concluded that there was evidence that long-term exposure to PM_{2.5} at the levels found can cause an increase in mortality, respiratory problems, hospitalizations, preterm births, and low birth weight. The agency said that in the short term, exposure could be harmful to sensitive populations, such as those with respiratory problems or heart disease. The

agency recommended that sensitive individuals monitor air quality and limit activity accordingly, and that the PA DEP work to reduce other sources of PM and its precursors.

ATSDR, in collaboration with the EPA Region 3 Air Protection

Division, (5) conducted an exposure investigation to evaluate exposures of residents living near the Brighi natural gas compressor station in Chartiers Township, Washington County, Pennsylvania. ATSDR concluded that, although exposure to the levels of chemicals detected in the ambient air was not expected to harm the health of the general population, “some sensitive subpopulations (e.g., asthmatics, elderly) may experience harmful effects from exposures to hydrogen sulfide and PM 2.5 [and] some individuals may also be sensitive to aldehyde exposures, including glutaraldehyde.” According to ATSDR, one of the study’s limitations was that the sampling “may not have adequately captured uncommon but significant incidents when peak emissions (e.g. unscheduled facility incidents, blowdowns or flaring events) coincide with unfavorable meteorological conditions (e.g. air inversion).” ATSDR recommendations included reducing exposures to the chemicals of concern to protect sensitive populations, continued collection of emissions data for long-term and peak exposures, and air modeling to better understand ambient air quality.

Schoharie County supervisors and medical professionals in 2015 (6) demanded comprehensive health impact assessments as a precondition for permitting natural gas pipelines and compressor stations.

The American Medical Association (AMA) in 2015 (7) adopted a resolution, “Protecting Public Health from Natural Gas Infrastructure,” that was based on a resolution adopted by the Medical Society of the State of New York. (See below.) The resolution states, “Our AMA recognizes the potential impact on human health associated with natural gas infrastructure and supports legislation that would require a comprehensive Health Impact Assessment regarding the health risks that may be associated with natural gas pipelines.”

The Southwest Pennsylvania Environmental Health Project, (8) as part of a literature review on the health impacts of compressor stations reported in 2015 that peak emissions of fine particles tended to occur during construction time, that day-to-day emissions during operational time can

fluctuate greatly, and that a compressor blowdown typically represented the single largest emission event during operations. Hence, documentation of these fluctuations cannot be captured by calculating yearly averages. A blowdown is an intentional or accidental release of gas through the blowdown valve that creates a 30- to 60-meter-high gas plume. Blowdowns, which are used to release pressure, can last as long as three hours. The authors noted that blowdowns result in periods of high levels of volatile organic compound releases and that anecdotal accounts associate blowdowns with burning eyes and throat, skin irritation, and headache. There is neither a national nor state inventory of compressor station accidents, nor a body of peer-reviewed research on the public health impacts of compressor stations.

David O. Carpenter at University at Albany in 2014 found high levels of formaldehyde near 14 compressor stations in three states. In Arkansas, Pennsylvania, and Wyoming, formaldehyde levels near compressor stations exceeded health-based risk levels. The authors noted that compressor stations can produce formaldehyde through at least two routes: it is created as an incomplete combustion byproduct from the gas-fired engines used in compressor stations. It is also created when fugitive methane, which escapes from compressor stations, is chemically converted in the presence of sunlight. Formaldehyde is a known human carcinogen. Other hazardous air pollutants detected near compressor stations in this study were benzene and hexane. One air sample collected near a compressor station in Arkansas contained 17 different volatile compounds.

The Clean Air Council report prepared in January, 2013 (9) by an independent consulting firm to evaluate air quality impacts from the Barto Compressor Station in Penn Township, Lycoming County, Pennsylvania predicted “large exceedances” of the nitrogen dioxide (NO₂) 1-hour NAAQS. Researchers used allowable emissions in the PA DEP permit, the 2006-2010 meteorological data and the latest EPA modeling guidance for the model’s prediction. Three techniques were used, and for two of the techniques, NAAQS exceedances occurred within a mile of the plant. The report concluded, “NO₂ impacts from the Barto plant alone are very significant since its emissions cause large exceedances of the 1-hour NAAQS.”

A **Pittsburgh Post-Gazette** March 9, 2020 article found that residents

living a quarter-mile from a compressor station in rural Washington County, Pennsylvania indicated that the persistent low-frequency sound from the station “gives them headaches and feels like torture.” The township does not regulate low-frequency noise. A member of the same family was recently diagnosed with multiple myeloma, a blood plasma cancer linked to benzene and other pollutants. This compressor station emitted 1.2 tons of benzene in 2018, “making it the third biggest source of the carcinogen in the seven-county southwestern Pennsylvania region,” according to data obtained from the Pennsylvania Department of Energy Emissions Inventory. Washington County has 40 compressor stations pushing gas through the pipelines.

Testimony at The National Press Club against the Federal Energy Regulatory Commission (10) described with great emotion a New York City Firefighter who responded to the Twin Towers during the 9/11 terrorist attack. He survived, but his lungs were damaged. His doctor told him that he would have to leave New York City due to air pollution in the city. He moved to a rural location in upstate New York. Shortly after moving he learned that a natural gas compressor station would be built nearby. His doctor told him he would have to move again.

The existing Transco compressor stations, and pipelines at this location have been discharging pollutants for many years. The Transco pipeline has been in operation since the late 1940's. Transco Compressor Station 165 has been in operation since the early 1960's. Transco Compressor Station 166 was built in 2015. They all leak, and emit a large number of toxic pollutants. They have been polluting for many, many years.

These pollutants in the gas stream are almost all heavier than air, heavier than carbon dioxide, and much heavier than methane, the primary constituent in natural gas. These heavier pollutants may have dropped out of the combustion emission discharge plume, the venting and blowdown emission plumes, and the fugitive leak plumes from the existing Transco compressor stations, and pipelines, and been deposited in the Chatham community.

These pollutants may have accumulated over time, and remain in the Chatham community. They may already be causing negative health outcomes, and environmental problems in the community that have not

been accounted for.

The Lambert Compressor Station may also deposit pollutants into the Chatham community, and add to negative cumulative community public health, and environmental pollution impacts far into the future.

It is very important that an accurate assessment of existing pollution and health impacts in the Chatham community is completed prior to issuance of an air discharge permit for the Lambert Compressor Station.

This has not been done, and it would unconscionable for DEQ to issue an air discharge permit for the Lambert Compressor Station without first determining if the Chatham community is already overburdened with negative public health issues, and environmental pollution after being subjected to pollution from Transco for over half a century.

The Chatham community is not a sacrifice zone. DEQ cannot turn a blind eye to this glaring omission in the permit process. To do so would be more than negligent.

Ambient air quality has not been properly assessed.

No local air pollution sampling data has been made available for the Chatham community, even though local air quality may be significantly impaired from pollutant discharges from the nearby Transco compressor stations, and pipelines.

The Chatham community ambient air quality for CO, NO₂, PM₁₀, PM_{2.5}, and SO₂ was incorrectly assumed using sampling results from Roanoke, Virginia, and Guilford, North Carolina air monitoring stations. These cities are far removed from the Chatham community, and air quality is likely to be fundamentally different, due to different air pollution sources. To state that air sampling from Roanoke and Guilford is indicative of air quality in the Chatham community is absurd, and incorrect.

No local air sampling was conducted for VOC's, formaldehyde, or for radioactive radon-222, which is carried in natural gas transmission lines in concentrations of 4000 - 6000 pico-curies per liter. This concentration is

based on air pressure inside the pipelines at about 100 times atmospheric pressure. Natural ambient air concentrations of radon are 0.4 pico-curies per liter. Pittsylvania County has already been ranked by EPA as being in the highest category for dangerous radon concentrations in homes.

Black powder from the interior of natural gas pipelines has been shown to contain high amount of radioactive lead-210, a byproduct of the radioactive decay of radon-222. This has been found as particulate matter in concentrations as high 17,000 becquerels per kilogram.

Transco and Lambert will carry different concentrations of these and other radioactive substances due to the varying geologic conditions at the extraction sites, and travel time, which influences the amount of radioactive decay, to the Chatham community.

See Addendum.

According to DEQ, Transco is currently conducting ambient air quality sampling, but no results are yet available. If and when this data is available it should be evaluated over an extended period of time, and under variable weather conditions in order to properly account for variable pollutant impacts to the community prior to Lambert air discharge permit consideration.

Ambient soil, or groundwater conditions for the Chatham community have not been properly assessed.

No local soil or water pollution sampling was completed for the Chatham community, even though deposition of toxic substances from air discharges from the existing Transco compressor stations and pipelines may have already contaminated the soil and groundwater.

No health assessments or testing have been completed for residents of the Chatham community.

No health assessments or testing have been completed for residents of the Chatham community.

Toxic substances emitted from the existing Transco compressor stations and pipelines for many years may already been inhaled and ingested by Chatham residents from repeated, and long term exposure. These substances may already be causing acute, and chronic negative health impacts in the Chatham community.

Additional pollution from the Lambert compressor station could exacerbate existing and long term negative public health impacts to Chatham residents from the nearby Transco compressor stations, and pipelines.

Actions needed for a reliable current public health and environmental assessment

Local soil, air, and groundwater sampling should be completed to determine the extent of pollution from the Transco compressor stations and pipelines, or other possible pollution sources. The sampling should be completed per EPA approved procedures, and be carried out by an independent qualified expert chosen by DEQ. Sampling should include CO, NO₂, PM 10, PM 2.5, SO₂, VOC's, formaldehyde, benzene, radon-222, and lead-210. Sampling should be conducted for a period of time that assures reliability of the findings in varying weather conditions. See Addendum

A community health assessment by the Virginia Department of Health to determine possible negative health impacts from the Transco compressor stations, and other possible pollution sources should also be completed for Chatham residents who chose to be included in the assessment.

DEQ should not issue an air discharge permit until these assessments are made, and ambient conditions are determined to be such that additional pollution discharges from the Lambert Compressor Station will create no negative environmental or public health impacts.

DEQ cannot allow Chatham Virginia to suffer a similar fate as Flint, Michigan

The Air Model Used to Predict Airborne Pollution From the Lambert

Compressor Station is Not Reliable For This Facility

The following comments refer to the DEQ engineering analysis Section VII, Dispersion Modeling.

The air modeling that was used for the Lambert Compressor Station is not suitable for this facility, and may not accurately predict pollutant deposition, distribution, or concentration.

Heavier than air, and heavier than methane pollutants in the combustion exhaust emissions, in the blowdown emissions, and in leaks from the Lambert Compressor Station may drop out of the discharge plumes, and be deposited in, and accumulate in the Chatham community. The pollutant discharge plumes may also come into contact with the ground near the compressor station during certain weather conditions, including air inversions.

AERMOD Version 19191 was used to model the pollutant plumes that would be emitted to the air from the Lambert Compressor Station. Aermod is what is referred to as a Gaussian model.

There are a number of scientific articles that indicate that AERMOD modeling systems are not suitable to predict pollutant concentration, deposition, or distribution from the proposed Lambert Compressor Station.

In Volume 82, Number 10 of the Federal Register, dated January 17, 2017 under 40 CFR Part 51 the EPA issued a final rule revising guidelines on air quality models. (EPA -HQ-OAR-2015-0310; FRL-9956-23-OAR) RIN 2060-AS54. (11)

2.1 (i) of the rule states Gaussian plume models use a **steady-state** approximation, which assumes that over the model time step, the emissions, meteorology and other model inputs, are constant throughout the model domain, resulting in a resolved plume with the emissions distributed throughout the plume according to a Gaussian distribution. This formulation allows Gaussian models to estimate near-field impacts of a limited number of sources at a relatively high resolution, with temporal scales of an hour and spatial scales of meters. **However, this formulation**

allows for only relatively inert pollutants, with very limited considerations of transformation and removal (e.g., deposition), and further limits the domain for which the model may be used. Thus, Gaussian models may not be appropriate if model inputs are changing sharply over the model time step or within the desired model domain, or if more advanced considerations of chemistry are needed. “

Emissions from the Lambert Compressor Station would not be steady state emissions. They would vary widely over time. They would vary during startup and shut down procedures, during variable air temperatures, during venting and blow down, during variable turbine use, during variable combustion load scenarios, and as the quantity of natural gas passing through the station varies, including the amount that is leaking from the facility.

Deposition of pollutants is a significant concern from Lambert emissions. As stated above, most of the pollutants carried in the gas stream, that would be discharged during blowdowns, venting, and leaks, and in combustion emission discharges are heavier than air, and much heavier than the methane in which they are initially entrained. They may deposit out of the emission plume in the Chatham community due to their significantly higher molecular weight.

Chemical reactions in the Lambert discharge plumes could also result in gaseous substances like sulfur dioxide and nitrous oxides reacting, and being reduced to solid, particulate matter that would also tend to drop out of the plume. AERMOD does not account for this change in the discharge plume. AERMOD only allows for inert, non reactive plume components in the air dispersion analysis.

Lakes Environmental (12) describes AERMOD as a **steady state model** for buoyant or neutrally buoyant plumes.

Gibson, Kundu, and Satish, 2013, (13) compared AERMOD predictions with actual sampling findings at various locations in Nova Scotia. They found mixed results in AERMOD accuracy, where in some cases **AERMOD greatly underestimated pollutant concentrations.**

Dresser and Huizer, 2011, (14) found **severe AERMOD underprediction** during unstable weather conditions.

DEQ is aware of the modeling shortcomings. DEQ has advised that the AERMOD modeling used for the discharge of pollutants to the air from the Lambert Compressor Station does not predict the ultimate location, or deposition of the pollutants. DEQ further advised that they did not consider deposition in the modeling analysis. DEQ also advised that they do not know the final location of pollutants that will be discharged from the Lambert Compressor Station, and that the AERMOD modeling only estimates pollutant concentrations.

Actions Needed to Determine the Deposition, Distribution, and Concentration of pollutants discharged to the Air From the Lambert Compressor Station.

Air modeling should be completed using a model that accurately predicts the deposition, distribution, and concentration of pollutants discharged from the Lambert Compressor Station during variable discharges, and under all weather conditions. The ADMS-3 model, an approved EPA alternate model, predicts wet deposition, dry deposition, gravitational settling, short term fluctuations in concentration, chemical reactions, radioactive decay, and gamma dose.

ADMS-3 modeling should be completed for the Lambert Compressor Station prior to consideration of permit issuance.

Leaks and Fugitive Emissions are Significantly Underestimated

The following comments are in response to the Draft DEQ Permit, Process Requirements, Number 7, Emission Controls for leaks, and the DEQ Engineering Analysis, Section II Compressor Fugitive Emissions, Section IV, Regulatory Review - Station Fugitives. Leaks and fugitive emissions from the proposed Lambert Compressor Station are significantly underestimated.

It is well known in the industry, and in the scientific literature that natural gas compressor stations leak and discharge large volumes of pollutants.

The predicted volume of leaks from the Lambert Compressor Station has been underestimated, and as a result, the predicted volume of pollutants discharged to the air in the Chatham community has been underestimated.

The DEQ engineering analysis for the proposed permit states that the volume of leak emissions was based on EPA emission factors ("Protocol for Equipment Leak Emission Estimates" for oil and gas production operations, 11/95 (EPA-453 / R-95-017), Table 2-4, Page 2-15 and Interstate Natural Gas Association of America (INGAA) guidelines.

The EPA equipment leak estimates are now outdated. They are 26 years old. The use INGAA guidelines is an inherent conflict of interest, and may not be valid.

The draft permit, Section 7A states that fugitive leaks below 500 parts per million are not considered leaks. Under that scenario, and with a volume at the compressor station of 375,000,000 cubic feet per day it would be possible to have leaks up to 187,500 cubic feet per day that are not counted as leaks. This is unacceptable. Leaks are leaks. All leaks must be considered to accurately account for total volume of leakage, and total pollutant discharge.

More recent studies indicate significant leakage from compressor stations.

D.T. Allen, 2016 (15) found that gas transmission emissions exceed underground storage emissions by 23 to 1. He found that emissions from pneumatic controllers of valves (as found in compressor stations) continually or intermittently emit gas, making this the largest source of emissions along the gas supply chain.

Zimmerle et al, 2015 (16) found that approximately 30% of gas losses occur during transmission and storage, and pneumatic devices (as found in compressor stations) emit gas as part of their routine operation.

Subramanian et al, 2015 (17) found the largest fugitive emission sources

were from compressor related equipment.

With the very large volume of gas passing through the Lambert Compressor Station, and the well known high rates of leakage from compressor stations, even a small percentage of leakage would constitute a large volume of leakage.

The previous federal administration rescinded voluntary methane reduction initiatives in the natural gas industry. Under the same administration, in September, 2020 the EPA removed all methane and VOC standards for natural gas compressor stations. Both of these actions are likely to further increase the volume of pollutant leakage from natural gas compressor stations, including leakage from the Lambert Compressor Station into the Chatham community.

Actions Needed to Accurately Estimate the Volume of Leaks and Fugitive Emissions

DEQ or the Virginia Air Pollution Control Board should form a task force to better understand, predict, and report on the volume of leaks and fugitive emissions, and resultant pollution from the Lambert Compressor Station. They should also seek consultation from an independent expert in this field.

Significant Pollution Sources From the Lambert Compressor Station Have Not Been Fully Assessed as a Result of Numerous Regulatory Waivers, Exemptions, and Loopholes

The following comments are in response to the various exemptions, waivers, and exclusions that are shown in the DEQ Engineering Analysis for the proposed Lambert Compressor Station. These exemptions, waivers, and exclusions leave the public health, and the environment vulnerable to pollutants that will be discharged to the air from the Lambert Compressor Station.

The numerous regulatory exemptions and waivers in the DEQ draft permit, and engineering analysis are very concerning. These legal loopholes allow significant pollutant discharges from the Lambert Compressor Station to be

hidden from analysis, and hidden from the Chatham residents whom they will impact.

These regulatory exemptions and waivers have left a large hole in the public health safety net that leaves Chatham residents, and their environment exposed and vulnerable to dangerous toxins that will be discharged from the Lambert Compressor Station.

I will not address all of these regulatory gaps, but I will address several of them.

It is possible that these regulatory loopholes will allow more pollution to impact the Chatham community than the amount of pollution that will be reduced by regulation of the pollutants that are not subject to these loopholes.

Discharge of Radioactive Substances

There is no reference in the DEQ draft permit, the DEQ engineering analysis, or the information submitted by the applicant to radioactive substances in the gas stream that will be discharged from the Lambert Compressor Station. It is well known in the industry, and the scientific community that radioactive substances with significant public health and environmental concerns are carried in the natural gas stream in transmission lines, and compressor stations.

These include radioactive radon-222, which is carried in the natural gas stream at an estimated 4,000 - 6,000 pico-curies per liter, while compressed within transmission lines to 100 times atmospheric pressure. Natural air levels are generally around 0.4 pico-curies per liter, although they may already be much higher in the Chatham community due to ongoing radon-222 releases from the nearby Transco compressor stations.

According to the EPA, radon-222 causes 21,000 lung cancer deaths per year in our country. EPA has ranked Pittsylvania County at the highest level for existing radon levels, and assumes that all homes in Pittsylvania County have radon-222 levels above 4 pico-curies per liter. This requires that remedial action be taken to reduce radon levels in the home.

It is also well known that radioactive lead-210, bismuth-210, and polonium-210 are found in natural gas transmission lines and compressor stations. These dangerous radioactive substances form as radon-222 decays. Lead-210 and polonium-210 form highly radioactive scales inside pipes that carry natural gas. Lead-210 has also been found in black powder in natural gas transmission lines at concentrations of 500 to 17,000 Bq/Kg.

Radon-222 will be discharged from the Lambert Compressor Station, and it is likely that lead-210, polonium-210, and bismuth-210 will be discharged as particulate matter as well.

These are very dangerous substances, especially if ingested or inhaled. They may have accumulated in the Chatham community from fifty plus years of Transco discharges, and the Lambert Compressor Station would further exacerbate this public health threat.

See Addendum and references

Discharge of Methane

The primary component in the natural gas stream is methane. This will be discharged from the Lambert Compressor Station in large volumes.

Methane is a very potent greenhouse gas, and it contributes significantly to our ever growing climate emergency. It is much more potent than carbon dioxide. Methane levels in our atmosphere are already 2.5 times higher than they have been in the past 180,000 years. According to Alvarez, et al methane accounts for 60% of the planetary warming then does carbon dioxide.

DEQ's engineering analysis indicates that methane discharges of 972 tons per year of CO₂ equivalent methane will be discharged.

Yet, these methane discharges are not regulated in any manner.

Discharge of All Greenhouse Gases/Climate Change

The application states that 25,000 tons of greenhouse gases per year will be discharged from the Lambert Compressor Station. I could not locate a separate discharge volume for carbon dioxide. Given the methane volume stated above, it is assumed that much of the greenhouse gas discharges will be carbon dioxide.

Carbon dioxide levels in our atmosphere have been between 180 ppm and 300 ppm for the past 180,000 years until starting to rise about 150 years ago. Our current level is around 415 ppm. Carbon dioxide persists in our atmosphere for centuries. Methane persists for decades. These extreme levels of greenhouse gases in our atmosphere will not be significantly reduced anytime in the near future, even if we stop discharging all of them today.

The last time that carbon dioxide levels were this high the sea level was about 50 feet higher than it is today, and temperatures were much hotter. This means that as our planet heats up from the newly higher carbon dioxide levels, all coastal cities would be destroyed, total land mass would be significantly reduced, crops would not grow, or produce far less, large areas of our planet would become uninhabitable, mass migration would cause world wide disruption and conflict, and extreme weather events including flooding, super hurricanes, and drought would become common place.

Climate change is by far the biggest environmental threat ever for humankind, and may cause more deaths than all previous wars combined.

Yet, the root cause of climate change, greenhouse gas emissions, and the very large amount of greenhouse gases that would be discharged from the Lambert Compressor Station are exempt from consideration in the air discharge permit. This is unacceptable.

Virginia has recently joined with 10 other states to form the Regional Greenhouse Gas Initiative to work cooperatively to reduce greenhouse gas emission, On March 26, 2021 Senator Mark Warner introduced bipartisan legislation to expand and support programs like the Regional Greenhouse Gas Initiative. Virginia has pledged to become carbon free by 2045.

And yet, as our climate increasingly turns against us, DEQ is considering an air discharge permit for the Lambert Compressor Station that completely discounts the very large amount of greenhouse gas that would be discharged.

This is a travesty, and an open door to the onrushing climate tragedy that we are facing.

The Lambert Compressor Station and the MVP Southgate Together Should be Considered a Single New Air Pollution Source

The Lambert Compressor Station is not a stand alone project. It is part of the MVP Southgate project. It is required to compress natural gas for the Southgate project. The MVP Southgate cannot exist without the Lambert Compressor Station, and the Lambert Compressor Station is not needed without the MVP Southgate. They are the same project, and should be regulated as a single new air pollution source.

The MVP Southgate will discharge large volumes of pollutants into our air. Numerous studies have shown that natural gas transmission lines, like the MVP Southgate leak significantly. The Lambert Compressor Station is capable of compressing 375,000,000 cubic feet of gas per day, and the MVP Southgate is capable of transporting that volume of gas. Based on both EPA and Alvarez, et al, the MVP Southgate would leak more than 1,000,000 cubic feet of methane and other pollutants in the gas stream into our environment. At a minimum, most of the methane would be leaked, or discharged to our air.

See Addendum.

Nevertheless, at this time, no air discharge permit is required for the MVP Southgate, or other natural gas transmission pipelines in Virginia.

Toxic Substances That Will Be Discharged Have Not Been Individually Assessed

Numerous other dangerous toxic substances that are carried in the natural gas stream, that will be discharged to the air from the Lambert Compressor

Station have not been evaluated on an individual basis, and will not be separately sampled, although they all have varying toxicity, and varying impacts to the environment, and human health. These include benzene, benzoic acid, ethane, heptane, hexane, naphthaline, octane, pentane, propane, and toluene, and the dangerous radionuclides radon-222, lead-210, polonium-210, and bismuth-210.

See Addendum

This leaves the public health, and our environment exposed, and vulnerable to these dangerous substances.

Actions Needed For Pollutants that Will Be Discharged from the Lambert Compressor Station that Fall Under Regulatory Exemptions, and Have Not Been Fully Addressed By the DEQ Draft Permit

Regardless of these regulatory loopholes it is the responsibility of DEQ to protect Virginia citizens, the Chatham community, and the environment by addressing the discharge of these very dangerous substances to our air, and our environment.

DEQ should research radionuclides in the natural gas stream, and consult with the Virginia Radiation Board on the release of these dangerous substances to our environment prior to finalizing a decision on this permit.

DEQ and the Virginia Department of Health (VDH) should hold a public meeting in Chatham to explain to local residents why many pollutants that will be discharged into the Chatham community have not been fully addressed in the draft permit, and to offer advice as to how residents can best protect themselves from these pollutants. This should include advising residents of health symptoms that might be caused by exposure to pollutants discharged from the Lambert Compressor Station, so they can seek proper medical care, if warranted.

DEQ or VDH should also provide a weather alert system to notify Chatham residents of air inversions, or other weather conditions that could result in increased pollution to the Chatham community. The alert should indicate actions that residents can take to protect themselves, like closing windows,

and curtailing outdoor activities.

Information regarding these issues should also be made available, and updated as necessary at the local library.

Since the waivers and exemptions in the regulations are approved by Virginia legislators and the Governor, DEQ should also advise members of the Virginia legislature and the Governor regarding the public health and environmental consequences of not fully addressing these pollutants.

Conclusion

DEQ does not have sufficient information to assess existing levels of pollutants in the air, soil, and water in the Chatham community from the Transco compressor stations, and other possible pollution sources.

DEQ does not have sufficient information to determine the health impacts to residents of the Chatham community from the existing Transco facilities, and other possible pollutant sources.

DEQ does not have sufficient information to assess ongoing pollutant discharges from the nearby Transco compressor stations.

DEQ does not have sufficient information to accurately predict pollutant discharges from the proposed Lambert Compressor Station.

DEQ does not have sufficient information to determine the cumulative public health and environmental impacts from further pollutant discharges from the Transco and Lambert compressor stations into the Chatham community, where existing pollutant levels and public health impacts have not been accurately determined.

DEQ should not issue an air discharge permit for the proposed Lambert Compressor Station.

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Addendum

Transmission Line and Compressor Station Leaks and Discharges To The Environment

Leaks and discharges from natural gas transmission lines, and compressor stations are common place, prevalent, and high volume.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) allows what they term non hazardous leaks from natural gas transmission lines to continue to leak without repair. (1)

Alvarez et al, in an article in Science Magazine in 2018 (2) found that natural gas transmission lines, like the MVP, lost 0.35% of their product during transmission and storage in 2015 through leaks and intentional venting discharges. These losses were somewhat higher than EPA's 2015 National Inventory for Greenhouse Gas and Sinks, and the increase was attributed to higher losses from abnormal operating conditions.

EPA's 2017 National Inventory of Greenhouse Gases and Sinks (3) found that 10% of natural gas transmission and storage losses were from intentional releases, including blowdowns for pipe repair and maintenance, and routine compressor station blowdown releases. Applying that percentage to the Alvarez et al study finds that, 0.315% of total pipeline volume is lost by leakage, while an additional 0.035% is lost through

intentional releases.

EPA's 2015 National Inventory for Greenhouse Gas and Sinks (4) found approximately 22% less losses during transmission and storage than did Alvarez et al.

D.T. Allen, 2016 (5) found that gas transmission emissions exceed underground storage emissions by 23 to 1. He found that emissions from pneumatic controllers of valves continually or intermittently emit gas, making this the largest source of emissions along the gas supply chain.

Balcolme et al, 2016 (6) found total losses along the supply chain range from 0.2% to 10%.

Littlefield, et al, 2017 (7) found a 1.7% loss from gas extraction to delivery, but stated that there are numerous knowledge gaps, and uncertainty in this area.

Zimmerle et al, 2015 (8) found that approximately 30% of gas losses occur during transmission and storage, and pneumatic devices emit gas as part of their routine operation.

Subramanian et al, 2015 (9) found the largest fugitive emission sources were from compressor related equipment.

Regardless of which study is more accurate, given the very large volume of gas transmitted through transmission lines, this is a very large volume of gas that is being released into our environment.

The MVP has been approved by FERC (10) to transport 2 billion cubic feet of natural gas per day (2 bcf/d). At an average loss rate of 0.35% per Alvarez, et al, the MVP would discharge 7,000,000 cubic feet of gas per day to our environment, when carrying 2 bcf/d. MVP has recently stated that they may increase volume to 2.5 bcf/d. This volume would result in the discharge of 8,400,000 cubic feet per day to our environment.

Leak locations may not be uniform over the entire pipeline. Leaks may be higher in some areas, and lower in other areas. The above figures

represent an average of losses over the entire transmission line. It is likely that more leakage occurs at valve stations, metering stations, and compressor stations than at pipe welds, and through openings in the pipe walls.

Unfortunately, there is a scarcity of information regarding the percentages of leakage from each possible location. PHMSA has advised me that they do not know the extent or location of leaks from gas transmission lines. I filed a FOIA request with PHMSA (11) in March, 2020 for more information regarding leaks, but that request has not been honored as of 4/1/21.

Intentional releases of gas would be confined to valve station, metering station, and compressor station maintenance blowdown events.

The amount of leakage and discharges from the MVP, Southgate Extension and their associated compressor stations is expected to be similar to the findings stated above. Those expected leaks and discharges are high volume.

Radioactive Substances In The Natural Gas Stream

Naturally occurring radioactive substances are found deep in the earth, including areas of shale where hydraulic fracturing (fracking) is used to extract natural gas. Fracking extracts and concentrates these substances. They are brought from deep underground, where they are safe, to the surface, where they are dangerous to the public health and the environment.

Under a 1980's federal exemption to the Resource Conservation and Recovery Act (RCRA), streams of waste from oil and gas wells, including radioactive waste, are not required to be handled as hazardous wastes. (11A)

Radioactive substances cannot not be fully separated from the gas stream, and they are carried downstream through gas transmission pipelines, and compressor stations.

Due to significant volumes of leakage, and intentional releases from these pipelines, and compressor stations, persons, wildlife, and the environment in proximity to them are at risk for radiation contamination.

Many locations along the route of the Mountain Valley Pipeline (MVP), and Southgate Extension are already high in naturally occurring radioactive radon-222. (12) Radon-222 is carried in the gas stream, and leaks and intentional discharges from these pipelines could further increase the risk of radon contamination for citizens along the routes.

Radioactive scales and sludges containing radioactive lead-210 and radioactive polonium-210, which are decomposition products of radon-222, are also deposited as scales along the inside of the pipes, and in filtering materials at compressor stations, and other structures. (13)

Lead-210 is also present inside the pipes as particulate matter in dust, or black powder, which can also be released through leaks and intentional discharges. (14)

Radioactive bismuth-210 is also a decay product of radon-222, but it is unknown if it is part of the radioactive scales that form inside the pipes. (15)

Filtering devices in the pipes and compressor stations cannot filter all of the particulate matter, and it is likely that lead-210, and possibly polonium-210, and bismuth-210 are discharged to our environment through leaks, and compressor station combustion discharges.

The threat to public health, wildlife, and the environment from these radioactive substances has not been adequately studied, regulated, or mitigated.

The Federal Energy Regulatory Commission's (FERC) environmental impact statement for the MVP does not address radiation threats from the pipeline, compressor stations, valve stations, and other equipment associated with the pipeline.

These threats are significant, and must be fully taken into account for, and mitigated in order to protect the public health, and the environment.

Properties of Radioactive Substances In the Gas Stream

The principle radioactive substances of concern in gas transmission lines are radon-222, lead-210, polonium-210, and bismuth-210. (16) These are byproducts of naturally occurring radioactive materials deep inside the earth, including radium-226, which is concentrated and extracted by high salt content in fracking fluids. Radium-226 decays to radon-222. Most of the radium-226 remains in wastewater associated with fracking, but radon-222, its decay product, and a gas, cannot be fully separated from the gas stream, and enters transmission lines, distribution lines, and associated structures.

Dangerous radioactive radon-222 that is carried in the gas stream decays to very dangerous radioactive lead-210, dangerous bismuth-210, and then extremely dangerous radioactive polonium-210, before eventually decaying to non radioactive lead. Radon-222, lead-210, bismuth-210, and polonium-210 are especially damaging to health if they are ingested, inhaled, or absorbed through the skin or eyes, since the radiation they release will cause damage from inside the body.

The radon-222 decay chain (as part of the Uranium decay chain) is as follows:

Radionuclide	Half life
Radon-222	3.82 days
Polonium-214	3.05 minutes
Lead-214	26.8 minutes
Bismuth-214	19.7 minutes
Polonium-214	0.16 mus
Lead-210	22 years
Bismuth-210	5 days
Polonium-210	138 days
Lead-206	Stable

Radon-222 (17)

Radon-222 is an odorless and colorless gas that is around 8 times heavier than air. It has a molecular weight of 222 gm/mol, compared to a weight of 29 gm/mol for air. It remains close to the ground, and diffuses into the stagnant air of crawl spaces and wells. It can seep into homes. It passes easily through soils, and can enter underground caves, passages, and voids in karst areas.

Radon-222 is inert, and does not react with other elements.

Exposure to radon-222 causes 21,000 deaths from lung cancer in the USA.

It has a half life of 3.8 days

Lead-210 (17)

Lead is an extremely toxic metal, even in its stable, non radioactive state.

It has a molecular weight of 210, and is around 7 times heavier than air.

The U.S. Agency for Toxic Substances and Disease Registry (ATSDR), which focuses on minimizing human health risks from hazardous substances, ranks non radioactive lead second on their substance priority list, only behind arsenic.

Lead is included in the national ambient air quality standards at 0.15 micrograms per cubic meter in total suspended particles as a 3 month average.

Lead-210 can be taken into the body through inhalation, ingestion, and eye and skin contact.

It is a possible carcinogen, and causes multiple negative health impacts, including weakness, exhaustion, tremors, and convulsions. It targets the central nervous system, and kidneys.

It has a half life of 22 years.

Polonium-210 (17)

Polonium-210 is extremely toxic. One microgram is more than enough to cause death. If ingested it is rapidly distributed throughout the body, where it concentrates in the soft tissues, and the bloodstream.

It also has a molecular weight of 210, and is about 7 times heavier than air.

The Centers for Disease Control and Prevention states that it can be emitted into the atmosphere since it is a product of radon gas.

Although uptake by plants is small, it can be deposited on broad leaved plants, and concentrated if those plants are vegetables that are consumed, or tobacco, if it is smoked. It is possible that polonium-210 is one of the substances associated with lung cancer from smoking tobacco.

Polonium-210 has a half life of 138 days.

Bismuth-210 (17)

It is highly radio-toxic

Bismuth-210, along with Lead-210 has been found to accrue selectively in the brain proteins in Alzheimer's disease, and brain liquids in Parkinson disease.

Longterm exposure to dust may result in mental changes, nervousness, blood changes, lymphocytosis, and bone marrow depression

It may cause long lasting effects to aquatic life.

It also has a molecular weight of 210, and is about 7 times heavier than air.

Bismuth-210 has a half life of 5 days.

Radiation In The Mountain Valley and Southgate Gas Stream

The Marcellus shale formation, from which natural gas for the MVP, and

Southgate Extension would be obtained, has the highest concentration of radioactive substances of all shale fields in our country. (18)

Samples of gas from 7 Marcellus Shale gas gathering locations in Pennsylvania found the highest concentration of radioactive substances in far southwest Pennsylvania. (19) This is the same area where the MVP would obtain its gas.

It is possible, therefore that radon-222, lead-210, bismuth-210, and polonium-210 radiation levels in the MVP, and Southgate Extension could exceed the levels found in other studies.

The transmission lines, distribution lines, and their associated structures regularly leak. The radioactive substances in the MVP and Southgate Extension pipelines would be leaked at valve stations, metering stations, compressor stations, pipe welds, and through small leaks in the pipes themselves.

Radon-222 in the gas stream is also intentionally released into the air during blowdown operations, including pipe cleaning blowdowns, and routine blowdowns at compressor stations.

Radon-222 gas is carried in the pipelines. Radon-222 has a half life of 3.8 days. Some of the radon in the transmission and distribution lines decays to lead-210 and this in turn decays to polonium-210, and is left as a radioactive scale or sludge along the inside of the pipes. However, due to the average speed of the gas stream of about 10 miles per hour, much of the radon-222 continues intact through the entire transmission and distribution lines where it is leaked and discharged.

The gas stream in the MVP and downstream Southgate Extension would reach the terminus in about 1 1/2 days, resulting in less radon decay, and leaving more than 75% of the radon in the gas stream at the terminus.

Concentrations of Radiation in the Gas Stream

Radon-222 in Gas Transmission Lines - All Measurements in Pico-Curies Per Liter at Atmospheric Air Pressure

McArthur and Lemons found concentrations up to 120. (20)

Mitchell and Griffin, 2016 found 41 to 74, and a throughput weighted average of 54 from gas collected from Marcellus shale. (21)

The PA DEP study cited in FERC's ACP Environmental Impact Statement (EIS) for the Atlantic Coast Pipeline found 29 to 58 at 4 compressor stations. (22)

Based on these studies, it is reasonable to assume a concentration of radon radiation in the MVP, and Southgate Extension transmission lines of 40 - 60.

Radiation in Scales and Sludges Inside Gas Production, Processing, and Transportation Equipment - All measurements in Pico-Curies Per Gram

The Louisiana DEQ in 1989 found 100,000 (23)

The Oil and Gas Journal in 1990 found several thousand. This article also states that long lived radon decay products that will continue to increase in pipelines for over 100 years (24)

The International Atomic Energy Agency in 2003 found 27,000 (25)

The Pennsylvania Department of Environmental Protection in 2015 found 3,580 (22)

Based on these studies, it is reasonable to assume concentrations of lead-210 and polonium-210 radiation in the scales and sludges inside the MVP, and Southgate transmission lines. It is unclear what levels of radioactivity would be found in these transmission line scales at various locations along the transmission line.

Nevertheless, it is clear that the level of radioactivity in these scales will increase significantly over the long term if the scale is not removed. The MVP has no close out plan to remove the scale inside the pipes, or the

pipes themselves after operations have ceased, and any scale inside will continue to increase in radioactivity. When the pipes eventually fail that radiation will be released to the environment.

Radiation in Dust Samples in Natural Gas Pipelines

Nowak and Jodlowski, 2019 found radiation levels of 13,515-459,510 pico-curies per kilogram in dust samples, or black powder in natural gas transmission lines. (26)

Radiation Exposure Pathways

The MVP, and Southgate Extension are underground pipes with facilities that include underground and above ground components.

Leakage and blowdowns from valve stations, compressor stations, and transfer stations would very likely discharge primarily to the atmosphere. Nevertheless these discharges would not dissipate, and some of the gas stream constituents would not remain airborne.

The primary constituent of the gas stream is methane, which has a molecular weight (mw) of 16, compared to the mw of air at 29. Therefore, methane would tend to rise in the air when discharged to the air. It would tend to move up and out of the ground to the air if discharged to the ground in an area that allows gas movement through the soil profile. However, if discharged to the ground in a karst area the methane may travel long distances underground through the voids in the karst, before finally rising through the soil column, or to the air through a sinkhole.

Many other constituents in the gas stream, including radon-222 (mw of 222), lead-210 (mw of 210), bismuth-210 (mw of 210) and polonium-210 (mw of 210) are much heavier than methane and the air, and would tend to separate from the methane once released into the environment. As the methane rises in the air or the soil, these constituents would tend to fall to the ground, if discharged into the air, or stay in the ground, if discharged to the ground.

It is also possible, but perhaps less likely, that leakage from valve stations, metering stations, and compressor stations may also be discharged to the ground through cracks or breaks in their underground vaults.

Leakage from the pipes and pipe joints would be discharged to the ground.

When released into our environment radioactive radon-222, lead-210, bismuth-210, and polonium-210 could contaminate the ground and groundwater, drinking water sources, nearby homes, vegetation, food crops, livestock, and wildlife.

In karst areas, the risk of contamination to the ground, groundwater, drinking water sources, homes, vegetation, food crops, livestock, and wildlife, including endangered species, is further increased, where voids allow the heavier than air radioactive elements to be concentrated underground, and be transported far from the pipeline through extensive karst networks.

All subterranean wildlife could be adversely impacted, including endangered species that inhabit underground locations, including the Indiana Bat, and the Northern Long Eared Bat, which inhabit caves.

Radon-222

Of particular concern are radon-222 leaks, which can then seep into homes, many of which are already high in naturally occurring radon contamination. The EPA estimates 21,000 deaths per year in our country from lung cancer from radon-222 inhalation. Many homes along the pipeline routes already have radon-222 levels that are unsafe, and above the EPA action level of 4 pico-curies per liter (pCi/L). (27)

Radon-222 leaks and seepage into these homes could further increase radon-222 levels, and the threat of lung cancer to residents of those homes.

EPA has ranked counties according to radon-222 zones regarding the amount of naturally occurring radon-222 that is expected in homes in that county. These rankings are as follows:

Zone 1 > 4 pCi/L The home needs to be fixed to reduce radon levels
Zone 2 2-4 pCi/L The home should consider fixes to reduce radon levels
Zone 3 < 2 pCi/L No fix is recommended

The MVP would pass through the following counties and their EPA radon-222 zone is shown: (28)

WV

Wetzel -2

Harrison - 2

Lewis - 2

Braxton - 2

Webster - 2

Nicholas - 2

Greenbriar - 1

Summers - 1

Monroe - 1

VA

Giles - 1

Montgomery - 1

Roanoke - 1

Franklin - 2

Pittsylvania - 1

The Southgate Extension would pass through the following counties and their EPA radon-222 zone is shown:

VA

Pittsylvania - 1

NC

Rockingham - 1

Alamance - 2

These county EPA radon-222 designations indicate existing conditions,

before the possible addition of radon-222 to the homes from leaks and discharges from the MVP, Southgate Extension, and their compressor station.

These EPA records indicate that most of the Virginia counties through which these pipelines would pass, have a predominance of homes that already have radon-222 levels where action is needed to protect the health of the residents. Additional radon-222 from leaks and discharges would add to the risk for these residents.

Most of the counties in West Virginia through which these pipelines would pass have homes that already have radon-222 levels where residents should consider fixing the home to reduce radon-222 levels. Additional radon-222 from leaks and discharges would add to the risk to these residents.

Most of the counties in North Carolina with the exception of Rockingham and Alamance Counties, have homes with radon-222 levels below the level where action is needed to reduce radon-222 levels. However, additional radon-222 seepage into these homes could increase radon-222 levels where action would be needed to fix the home to reduce radon levels.

It is not known if additional radon-222 discharges to the ground from the pipelines would increase the amount of radon-222 in nearby homes, but the potential for that to occur is certainly present, especially in karst areas.

It is also possible that radon-222 leaks and intentional releases to the atmosphere would settle back to the earth near the source, where the radon-222 could enter the homes. Radon-222 is heavier than air and is likely to separate from the methane in those leaks and releases, and drop back to the ground near the source. The radon-222 will also decompose into lead-210, bismuth-210, and polonium-210, and these radionuclides may accumulate near the source as well.

These concerns are especially worrisome near compressor stations, where regularly scheduled blowdowns emit large amounts of gas containing radon-222, and likely particulate matter containing lead-210, bismuth-210, and polonium-210.

Radon-222, lead-210, bismuth-210, and plutonium-210 could also enter the groundwater and be drawn into public and private drinking water sources. Radon-222 cannot be filtered from these drinking water sources.

Radon-222 from natural gas also enters homes and structures where natural gas is used. Studies vary in their findings of the increased risk of lung cancer death from this use of natural gas. Various factors affect the risk, including the amount of gas burned, the size of the structure, the rate of air circulation from outside, whether the burned gas is vented to the outside or unvented, and the hours per day that the home or facility is occupied.

Radioactive Scales and Sludges

Another source of radiation exposure are the scales and sludges, including lead-210 and plutonium-210, that are deposited along the inside of the pipelines as radon-222 decomposes.

Some of these are removed during pipe maintenance operations, and they must be disposed of properly in order to protect the public, and industry workers. However, due to the federal RCRA exemption for these materials they do not have to be treated under hazardous waste requirements. The ultimate disposal of these radioactive substances has not been covered in FERC's environmental impact statements.

Radioactive scale along the inside of the pipes, and possibly radioactive sludge will remain in the pipes after the project is completed, and gas is no longer being transported. Neither the MVP, nor the Southgate Extension has a close out plan that requires removal and proper disposal of these radioactive substances. It is likely that the pipes will be left in place with this radioactive material inside them.

As long as this material is left in the pipes it may not generally be a public health problem. However due to the long half life of lead-210, the amount of radioactive material in the pipes could increase for over 100 years.

If the pipes are left in place they will eventually fail and collapse, releasing

this radiation to our environment.

Failure of FERC's MVP Environmental Impact Statement to Adequately Assess Radiation Risks

FERC's environmental impact statement (EIS) for the MVP fails to adequately assess radiation risks to the public and the environment, and I believe that failure is a violation of the National Environmental Policy Act (NEPA).

FERC has failed to consult with federal agencies with expertise on radiation issues. The federal agencies with expertise in radiation protection are the Environmental Protection Agency (EPA), The Nuclear Regulatory Commission (NRC), and the Department of Energy (DOE). None were consulted. The MVP EIS includes some general EPA information regarding radon-222, but there is no evidence of FERC seeking out EPA guidance specific to MVP radiation issues.

The MVP EIS only addresses radon-222 exposure to persons using natural gas in their homes.

The MVP EIS does not cover other radionuclides in the gas stream, including lead-210, bismuth-210, and polonium-210 as many research studies have found.

It does not cover the large ongoing leaks and discharges of radon-222, lead-210, bismuth-210, and polonium-210 that will occur along the MVP, as many research studies have found.

It does not cover the radioactive scales and sludges that will accumulate inside the pipes, as further research studies have found.

It does not cover waste disposal issues when these scales and sludges are removed from the pipes, and from filters during routine maintenance operations.

It does not cover the radioactive scales in the pipes that may also be left in the ground after project completion.

It does not include a close out plan that requires adequate clean up of radioactive materials remaining in the pipes.

Needed Actions to Protect The Public Safety

- Store all gas that would be transported in the MVP, and Southgate Extension for at least 25 days to remove 99% of the radon-222 prior to transport. This would eliminate virtually all radon-222 gas releases, particulate lead-210, bismuth-210, and polonium-210 releases, and lead-210, and polonium-210 scales and sludges inside the pipeline

If the above storage is not accomplished:

- Notify the public near the route of the pipelines of the possible threat from radioactive substances.

- Require pipeline companies to pay for tests for radon-222 levels in homes near the pipelines prior to gas transport, and then at one year intervals for five years following initiation of gas transport. If there is a significant increase in radon-222 levels the pipeline company should pay for remediation to reduce radon-222 levels to pre construction levels.

- Require the same tests for public and private drinking water sources near the pipelines.

- Require the same tests for soils near the pipelines.

- Require discharge permits for the release of radon-222, lead-210, and polonium-210 from the pipelines, and their associated structures.

- Require ongoing testing for radioactive substances in the gas stream prior to it entering the transmission lines, and where gas is transferred from transmission lines to distribution lines. Set limits on those radioactive substances.

- Require disposal of sludges and scales from pipe and equipment clean

out operations to be carried out in accordance with requirements for other radioactive wastes.

- Require removal of all pipes, scale, and sludges at project close out, and require disposal in accordance with requirements for other radioactive wastes.

Non Radioactive Pollutants in The MVP Natural Gas Stream

Natural gas that is transported through transmission lines, like the Mountain Valley Pipeline (MVP) is primarily methane, but other substances are present as well. Most of these substances, including methane, are harmful to human health and the environment. Due to ongoing leaks and intentional discharges from these transmission lines and their aboveground structures, these substances are discharged in large volume into our environment, where they pollute our air and water, and threaten our health.

Natural gas transmission lines, like the MVP, routinely leak. The Pipeline and Hazardous Material Safety Administration (PHMSA) allows what they term nonhazardous leaks to continue. The volume of ongoing leakage from the MVP is likely to be very high, due to the large volume of gas it would transport.

Pollution threats to human health and the environment are increased where the MVP would travel through karst areas. Pollutants that are leaked into karst voids could quickly enter private drinking water wells and springs, and could travel long distances in a short period of time.

The Federal Energy Regulatory Commission's (FERC) final environmental impact statement (FEIS) for the MVP does not adequately address these threats to public health and the environment.

These threats should be further studied, addressed, and eliminated prior to the MVP being placed into operation.

Specific Non Radioactive Pollutants in Natural Gas Stream

The largest constituent carried in natural gas pipelines is methane. There are other constituents as well, including liquids that can precipitate out of the gas. Most of these can result in environmental damage when released, and can be detrimental to human health and wildlife.

The percent of constituents carried in natural gas pipelines can vary considerably according to where the natural gas is obtained. Almost all of these constituents can be considered pollutants, and many are toxic.

Methane volume in the natural gas stream is generally between 90% and 95%, but can be as low as 60%. Other pollutants include ethane, propane, butane, pentane, hexane, heptane, octane, hydrogen sulfide, and aromatic chemicals, including benzene, toluene, benzoic acid, and naphthaline.

Enbridge Gas, Inc. lists the following typical analysis of their natural gas, sourced from the United States and Canada. (29)

Component	Typical Analysis (%)	Range (%)
Methane	93.9	78.0 - 97.0
Ethane	4.2	1.5 - 9.0
Propane	0.3	0.1 - 1.5
Iso - Butane	0.03	0.01 - 0.3
Normal - Butane	0.03	0.01 - 0.3
Iso - Pentane	0.01	trace - 0.04
Normal - Pentane	0.01	trace - 0.04
Hexanes Plus	0.01	trace - 0.06
Nitrogen	1.0	0.2 - 5.5
Carbon Dioxide	0.5	0.05 - 1.0
Oxygen	0.01	trace - 0.1
Hydrogen	trace	trace - 0.02

Croft Production Systems lists the following components of natural gas and their range of percentage in the gas stream. This indicates the variability in natural gas constituents based on where the gas is sourced. (30)

Component	Range (%)
Methane	60 - 90
Ethane	0 - 20
Propane	0 - 20
Butane	0 - 20
Carbon Dioxide	0 - 8

Oxygen	0 - 0.2
Nitrogen	0 - 5
Hydrogen Sulfide	0 - 5
Rare Gases	0 - 2

Benzene is also carried in natural gas pipelines at around 0.1%

Negative Impacts of Pipeline Pollutants

All of the following pollutants carried in gas pipelines have negative health and environmental impacts.

The pollutants have carcinogenic, mutagenic, and toxic properties. They negatively impact respiration, and the central nervous system, cause cardiac arrhythmia, displace oxygen, and cause toxicity to aquatic life, with long lasting impacts. There are other negative impacts, as shown below.

(31)

The following information was obtained from the National Institutes of Health

Benzene - C₆H₆

Heavier than air

Less dense than water and slightly soluble in water, floats on water

Flammable

Environmental contaminant

Toxic, carcinogenic, mutagenic

Coma and death possible

May be fatal if swallowed and enters airways

Damages bone marrow and central nervous system

Chronic exposure linked to oxidative stress and leukemia

OSHA permissible limits 1 PPM for 8 hours and 5 PPM for 15 minutes

NIOSH permissible limit 0.1 PPM for 10 hours

Benzoic Acid - C₆H₅CO₂H

Anti-fungal agent of relatively low concern

Butane - C₄H₁₀

Heavier than air

Extremely flammable

Immediately dangerous to life and health

Sudden death when inhaled at high concentrations

Central nervous system impacts

10 minute exposure at 1% causes drowsiness May cause cancer and genetic defects

OSHA permissible limit 800 PPM for 8 hours NIOSH permissible limit 800 PPM for 10 hours

Ethane - C₂H₆

Asphyxiant that can cause death when it displaces air

Heavier than air and may displace Oxygen in low places

Very high mobility in soil

Extremely Flammable

When mixed with Chlorine Dioxide it always explodes spontaneously

Heptane - C₇H₁₆

Heavier than air

May explode in enclosed area

Inhalation irritant to respiratory tract causing coughing and difficulty breathing

May cause impacts to central nervous system

If swallowed, enters airways, and could result in aspiration pneumonitis

Defats the skin, which may cause dryness and cracking

OSHA permissible limit 500 PPM for 8 hours

NIOSH permissible limits 85 PPM for 10 hours, and 750 PPM is immediately dangerous to life or health

Hexane - C₆H₁₄

Heavier than air

Highly flammable and explosive

Causes peripheral polyneuropathy and testicular atrophy

Irritates eyes, nose, and respiratory tract

Inhalation causes respiratory tract irritation, cough, mild depression, and cardiac arrhythmia Aspiration causes severe lung irritation, coughing, pulmonary edema, and excitement followed by depression

Ingestion causes nausea, vomiting, swelling of the abdomen, headache, depression Associated diseases and disorders - Crohn's Disease and ulcerative colitis

OSHA permissible limit 500 PPM for 8 hours

NIOSH permissible limit 50 PPM for 10 hours

Hydrogen Sulfide - H₂S

Highly flammable

Heavier than air

Very toxic by inhalation

Deadens smell, victims unaware of presence until it is too late

Death or permanent injury can occur after short exposure to small quantities

Toxic by all routes including inhalation, ingestion, and absorption

Inhalation may cause lung edema and long term chronic bronchitis

Causes ulceration of the skin, conjunctivitis, inflammation of nasal mucosa, shortness of breath, and trachibronchitis

May cause effects on central nervous system

OSHA permissible limit 10 PPM for 10 minutes

NIOSH permissible limit 10 PPM for 10 minutes

100 PPM is immediately dangerous to life and health

Methane - CH₄

Asphyxiant that can cause death when it displaces air

Lighter than air

Extremely flammable Greenhouse gas

Naphthalene - C₁₀H₈

Carcinogenic agent

Much heavier than air

May be associated with an increased risk in developing laryngeal and colorectal cancer. Environmental contaminant

Skin exposure must be avoided

Vapors may be toxic

Exposure associated with hemolytic anemia, liver damage, neurological system damage, retinal hemorrhage, and cataracts.

Denser than water and insoluble in water

Lethal dose 5 - 15 grams for adults, and 2 grams within 2 days for a 6 year old child.

OSHA permissible limit 10 PPM for 8 hours

NIOSH permissible limit 10 PPM for 10 hours, or 15 PPM for 15 minutes

Octane - C₈H₁₈

Heavier than air

Less dense and insoluble in water, floats on water

Highly flammable

Very toxic to aquatic life with long lasting effects - acute hazard

Produces irritating vapor

Inhalation of concentrated vapor may cause irritation of respiratory tract, depression, and pulmonary edema

May be fatal if swallowed and enters airways

Harmful in contact with skin, causing skin irritation

Serious eye irritation

Aspiration causes severe lung irritation, rapidly developing pulmonary edema, and central nervous system excitement, followed by depression

OSHA permissible limit 500 PPM for 8 hours

NIOSH permissible limit 75 PPM for 10 hours

Pentane - C₅H₁₂

Heavier than air

Highly flammable and explosive

Asphyxiant

Toxic to aquatic life with long lasting effects

Inhalation causes drowsiness and dizziness

Very high concentrations produce narcosis and depression of the central nervous system Aspiration into lungs can produce chemical pneumonitis and/or pulmonary edema Causes irritation of the eyes, skin, nose, dermatitis, nausea, and unconsciousness Lowest published human inhalation lethal concentration 130 mg/cubic meter

Lethal concentration mouse inhalation 325 mg/cubic meter

OSHA permissible limit 1000 PPM for 8 hours
NIOSH permissible limit 120 PPM for 10 hours

Propane - C₃H₈

Asphyxiant that can cause death when it displaces air
Heavier than air and may displace Oxygen in low places
Extremely flammable
Concentrations of greater than 10% can cause dizziness in a few minutes
Concentrations of 1% can cause dizziness in 10 minutes
OSHA permissible limit 1,000 PPM for 8 hours
NIOSH permissible limit 1,000 PPM for 10 hours
Lowest published lethal concentration inhalation by dog - 180,000 PPM for 5 minutes, death from cardiac arrhythmias

Toluene - C₆H₆CH₃

Heavier than air
Less dense than water and insoluble in water, floats on water
Substance of very high concern
Vapors irritate eyes and upper respiratory tract, and cause dizziness, headache, anesthesia, and respiratory arrest
Liquid irritates eyes, and causes drying of the skin
Aspiration causes coughing, gagging, distress, and rapidly developing pulmonary edema Ingestion causes vomiting, griping, diarrhea, and depressed respiration
OSHA permissible limit 200 PPM for 8 hours
NIOSH permissible limit 100 PPM for 10 hours, and 150 PPM for 15 minutes

All of these polluting chemicals are likely to enter confined karst underground environments, groundwater, and surface water, along, and near the current proposed route of the MVP. Each of them has specific negative impacts to the the public health, the environment, and to living organisms, including endangered species. In combination, these pollutants pose an even more significant threat.

Pollution Exposure Pathways

The MVP is an underground pipe with facilities that include underground and above ground components.

Leaks and intentional discharges from valve stations, compressor stations, and transfer stations would very likely discharge primarily to the atmosphere. Nevertheless these discharges would not dissipate, and some of the gas stream constituents would tend to separate from the discharge plume and fall to the ground.

The primary constituent of the gas stream is methane, which has a molecular weight (mw) of 16, compared to the mw of air at 29. Methane would rise in the air when discharged to the air. It would tend to move up and out of the ground to the air if discharged to the ground in an area that allows gas movement through the soil profile. However, if discharged to the ground in a karst area the methane may travel long distances underground through the voids in the karst, before finally rising through the soil column, or through a sinkhole, or other opening to the surface.

Many other constituents in the gas stream, are much heavier than methane, and heavier than air. These substances would tend to separate from the methane once released into the environment. As the methane rises in the air or the soil, these substances would tend to fall to the ground, if discharged into the air, or stay in the ground, if discharged to the ground.

It is also possible, but perhaps less likely, that leakage from valve stations, metering stations, and compressor stations may also be discharged to the ground through cracks or breaks in their underground vaults. Most of these leaks, however, would be to the air

Leakage from the pipes and pipe joints would be discharged to the ground.

When released into our environment these substances could contaminate the air, the ground, groundwater, drinking water sources, nearby homes, vegetation, food crops, livestock, and wildlife.

In karst areas, the risk of contamination to the ground, groundwater, drinking water sources, homes, vegetation, food crops, livestock, and

wildlife, including endangered species, is further increased, where voids allow the substances that are heavier than air to be concentrated underground, and be transported far from the pipeline through extensive karst networks. All subterranean wildlife could be adversely impacted in karst areas.

Pathways of Natural Gas Pollutants from Pipeline to Karst

The MVP is a 42 inch diameter pipeline that would be buried underground. On average, the top of the pipe would be around 6 feet under the surface of the ground, and the bottom of the pipe would be 9 to 10 feet under the surface. Compacted soil would cover the pipe to that depth. Gas in the pipeline would be pressurized more 100 times greater than atmospheric pressure. Due to the very large difference in pressure inside and outside of the pipe, leaks and intentional discharges would be constantly forced out under high pressure.

Renowned karst expert and hydrogeologist Christopher Groves points out that caves and karst areas are interconnected to a greater extent than previously thought, and pollutants can travel rapidly through them. He also points out that pollutants can enter karst aquifers not only through sinkholes and sinking streams, but through diffuse infiltration, or diffuse autogenic recharge, through highly permeable bedrock covering large areas, with little filtering. (32)

Since the pipe will be covered with 6 to 10 feet of compacted soil, the pressurized leaks will flow along the path of least resistance, and in many cases enter karst voids and caves, rather than discharge to the atmosphere. There are three possible pipeline pollutant pathways to the karst voids and caves.

- 1 - Through interconnected karst passages, no matter how small, in the immediate area of the pipe leak.
- 2 - By following the outside of the pipe along voids around the pipe created by subsurface water flow and inherent difficulty in completely compacting soils immediately adjacent to a large 42 inch diameter pipe, and then entering karst voids and caves through an interconnected karst passage.
- 3 - By diffuse infiltration, either at the leak location, or along the voids in the

ground along the pipe.

Once the pollutants reach the karst voids and caves, they could accumulate and concentrate within these confined spaces.

FERC's MVP Environmental Impact Statement (EIS) Inaccuracies Regarding Impacts of Pipe Pollutant Leaks

FERC's EIS (12) is severely deficient regarding pipeline leaks to karst. FERC's Environmental Impact Statement (EIS) for the MVP states that there is little chance of pipeline operations contaminating groundwater. It goes on to state that since methane is lighter than air it dissipates rapidly causing little impact to karst, caves, and groundwater.

These FERC statements do not accurately assess the negative impacts of MVP pipe leaks to subterranean karst areas. The following is a summary of how the EIS is not accurate in this regard:

- The EIS only addresses Methane, and none of the other numerous polluting substances that would be leaked from the pipe.
- Even though methane is lighter than air, it would be discharged from leaks in the pipe 6 to 10 feet underground. It may not migrate up through the soil profile to the atmosphere. The compacted earth above the pipe may prevent the methane from reaching the atmosphere. Instead, the methane could follow the path of least resistance, and be drawn into the many nearby interconnected karst passages and voids, or enter the karst passages and voids by diffuse infiltration through permeable material.
- Barometric pressure differences would have little or no impact on methane being drawn into karst, because the leaks may be effectively blocked from the atmosphere by the 6 to 10 feet of fill over the pipe. Regardless of the barometric pressure, methane, and other gas stream pollutants could be drawn into underground voids in the karst.
- Inspections of the trench for openings to karst as described in the karst mitigation plan will not adequately insure that all pathways from the trench to karst voids are found and sealed due to the following factors:

- Openings to karst may be too small to be located and sealed during this massive construction project, which is planned on slopes exceeding 60% under very adverse conditions, and with much loose material in the trench, making observation of openings extremely difficult. The MVP has stated that they plan to continue construction throughout the winter, and when the ground is covered with snow. Construction workers, or even karst specialists, will not be able to find all openings to karst, or even a reasonable number of them, under these adverse conditions. Nor will they be able to locate and somehow seal permeable material in the base of the trench that would allow leaked pollutants to enter the karst voids. These pathways to karst will remain after the pipe is in the ground and carrying a very large volume of gas. Leaks of pollutants in the gas stream will surely enter the subterranean karst environment.

- The EIS incorrectly states that the likelihood of a gas release is low. All evidence, as indicated by EPA, the Alvarez study, and others, shows that these very large cumulative releases are routine, pervasive, and ongoing.

- The EIS states that the pipeline will be monitored, but PHMSA regulations only require patrols and leak detection inspections once every 15 months. Regardless, the chances of a patrol or leak detection inspection finding an underground leak to karst is extremely rare.

The EIS is correct in one sense regarding pipeline leaks. It states that methane is an asphyxiate that displaces oxygen and is hazardous in confined spaces. This statement is directly applicable to methane discharges to karst voids.

Suggested Actions To Protect The Public Health And The Environment

Require the MVP to test drinking water supplies, including private wells and springs in proximity to the route, for substances that could be carried in the gas stream. This should be done prior to gas being sent through pipe, and at one year intervals thereafter.

Require the MVP to fully compensate property owners whose drinking

water sources have been contaminated by these substances.

Require techniques to remove or substantially reduce these substances, except for methane, from the gas stream.

Require ongoing testing of the gas stream to determine the percentage of these substances in the gas stream.

Do not allow gas with levels of these substances above safe levels to be transported through these pipelines.

Require increased inspections

Require that all pipeline leaks be promptly repaired.

Addendum References

- 1) 49 CFR 192.711
- 2) Alvarez, et al, Environmental Defense Fund, Science Magazine, July 13 , 2018
- 3) EPA 2017 National Inventory of Greenhouse Gas Emissions and Sinks
- 4) EPA 2015 National Inventory of Greenhouse Gas Emissions and Sinks
- 5) David T. Allen, Journal of Air and Waste Management
- 6) Paul Balcolme, et al 2016 ACS Publications 10/7/16
- 7) James A. Littlefield, et al, Journal of Cleaner Production 4/1/17
- 8) Daniel J. Zimmerle, et al Environmental Sciences and Technology, 7/21/15
- 9) R. Subramanian, et al, Methane Emissions From Natural Gas compressor Stations in the Transmission and Storage Sector; Measurements and Comparisons with the EPA Greenhouse Gas Reporting Protocol, Environmental Sciences and Technology 2/10/15
- 10) FERC MVP EIS
- 11) PHMSA FOIA Control Number 2020-129
- 11A) 42 U.S.C. 6921(b)(2)(A)
- 12) EPA Radon Map
- 13) Alan McArthur, William Lemons NORM IX Mandatory Air Monitoring of TENORM Worker Inhalation Exposure from Gas TENORM, Pittsburgh Mineral and Environmental Technology

- 14) Nowak and Jodlowski, 2019, Radioactivity of the Gas Pipeline Network in Poland, 2019, Pub.Med. gov
- 15) Radon-222 Decay Chain
- 16) Dr. Ian Fairlie, Radioactive Dangers of Fracking Version 1.2 9/27/18 YouTube
- 17) NIH PubChem
- 18) Justin Nobel Physicians for Social Responsibility Webinar 2/19/20
- 19) Austin L. Mitchell, W. Michael Griffin, Elizabeth A. Casman, Lung Cancer Risk From Radon in Marcellus Shale Gas in Northeast U.S. Homes 2/16/16 National Library of Medicine
- 20) Alan McArthur, William Lemons NORM IX Mandatory Air Monitoring of TENORM Worker Inhalation Exposure from Gas TENORM, Pittsburgh Mineral and Environmental Technology,
- 21) Austin L. Mitchell, W. Michael Griffin, Elizabeth A. Casman, Lung Cancer Risk From Radon in Marcellus Shale Gas in Northeast U.S. Homes 2/16/16 National Library of Medicine
- 22) Pennsylvania Department of Environmental Protection, Radiation Protection Technologically Enhanced Naturally Occurring Radioactive Materials (TENORM) Study, 1/15/15
- 23) U.S. Department of Labor, OSHA 1/26/89
- 24) Oil and Gas Newsletter, Peter Grey, 6/25/90
- 25) IAEA Technical Report Series No. 49, 2003
- 26) Nowak and Jodlowski, Journal of Environmental Radioactivity, 2019
- 27) [www.epa.gov>radon](http://www.epa.gov/radon)
- 28) EPA radon map
- 29) Chemical Composition of Natural Gas, Enbridge Gas, Inc. Website
- 30) Croft Production Systems Oil and Gas Blog Jessica Lee October 7, 2015
- 31) NIH PubChem Sites for each listed pollutant
- 32) Dr. Christopher Groves Karst Landscapes and Aquifers of the Central Appalachian Mountains, and Implications for the Proposed Mountain Valley Pipeline FERC Accession No. 20161223-5058 Mountain Valley Pipeline Docket

William F. Limpert
wflimpert@gmail.com
4012B Garfield Road
Smithsburg, MD 21783

301-416-0571

Untitled attachment 00009.htm

Archived: Tuesday, April 6, 2021 8:31:21 AM
From: Catherine Carver
Sent: Monday, April 5, 2021 12:08:23 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Dear Ms. Walthall:

I believe a full public hearing before the Full Air Pollution Control Board is necessary for the Mountain Valley Pipeline Lambert Compressor Station. There are concerns over air quality, noise pollution, health, and environmental justice.

The DEQ should take existing levels of air pollution into consideration when evaluating the proposed location for the Lambert Compressor Station. If this facility were to be built next to the two existing Transco compressor stations, the combined emissions would be equivalent to a Clean Air Act Title V air pollution facility for carbon monoxide, nitrogen oxides, volatile organic compounds, and potentially hazardous air pollutants.

Formaldehyde is the only air pollutant subject to hourly and yearly emission limits, and MVP predicts that the Lambert Compressor Station will emit almost 9 pounds of formaldehyde an hour, on top of the background rate of 19 tons/year emitted by the Transco compressor stations 165 and 166. Yet there are several other hazardous air pollutants listed in the Environmental Impact Statement, including benzene, toluene, and xylenes that can cause adverse health effects but are not listed in this air permit.

It is unclear how MVP plans to coordinate with the two existing Transco compressor stations to stagger startups and shutdowns to reduce the amount of air and noise pollution and harm on nearby communities. Four Environmental Justice communities were identified within a 3–5-mile radius of the proposed compressor station, although MVP's revised permit application used only a 1-mile radius. The consultant's report accepted screening within a 3-mile radius. Could there have been a better analysis of alternative sites with a lower EJ impact? Outreach to impacted communities should have occurred earlier in the process, as the accelerated timeline of review and approval is inconsistent with the appropriate outreach encouraged by Virginia's 2020 Environmental Justice Act.

Among other legal challenges, the MVP mainline is currently unable to cross many miles of water bodies and MVP has announced to Va. DEQ that they will file for an individual permit which would add substantial delay.

With the Mainline nowhere near completed, there is no need to permit or create infrastructure for a project with so much uncertainty and that stands to harm people's health through air and noise pollution.

Sincerely,

Catherine Carver
13520 Union Village Circle
Clifton, VA 20124
704-655-5069

Archived: Tuesday, April 6, 2021 8:31:21 AM

From: vgresolutions@gmail.com

Sent: Monday, April 5, 2021 12:06:40 PM

To: anita.walthall@deq.virginia.gov

Subject: Lambert compressor station

Importance: Normal

I stand with many others who are against the building of a compressor station for the proposed Southgate extension of 987 Transco Road in Chatham, Virginia. It would only be 10 miles from public schools and extend the MVP 75 miles into North Carolina. The project being connected to is currently \$3 billion over budget, riddled in litigation and already has 300 water violations. These people have no respect for the laws already in place so what makes one think they care about the future of our country and it's lands.

Please put an end to this injustice against people and the generations to come with violations of our lands.

Thank you,
Geraldine Fatundimu
276-618-0898
P O Box 1021
Fieldale, VA 24089
Sent from [Mail](#) for Windows 10

Archived: Wednesday, April 7, 2021 6:45:42 AM

From: natcp1en1@everyactioncustom.com

Sent: Tuesday, April 6, 2021 12:06:07 AM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms Natalie Pien

20644 Gleedsville Rd Leesburg, VA 20175-6532

natcp1en1@gmail.com

Archived: Thursday, April 8, 2021 10:10:06 AM
From: Audrey Clement
Sent: Wednesday, April 7, 2021 10:32:54 PM
To: anita.walthall@deq.virginia.gov; deqpublicinfo@deq.virginia.gov
Cc: Elle De La Cancela
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal

Anita,

I am requesting a public hearing before the full Virginia Air Pollution Control Board on MVP's application for an air permit for the Lambert Compressor Station. I explain why in my comments below.

Audrey Clement, Ph.D.
1530 N. Longfellow Street #B
Arlington, VA 22205
571-830-8889 cell

The "Supplemental Information on Environmental Justice" report submitted by MVP Southgate to support its application for an air permit to operate the Lambert Compressor Station argues that although at least one of the criteria for establishing the existence of an environmental justice community around the station has been met, this fact is immaterial since its modeling has demonstrated that the facility will have no adverse environmental impact.

https://drive.google.com/file/d/1bz_3y_XEfF-sY4C8zWH6RT2hNhlyjNjX/view

Specifically, although the surrounding area has a significant percentage of low incomes households, according to Table 4 of the report, the maximum cumulative impact of the facility is likely to fall well below NAAQS limits for emissions of nitrous oxide, carbon monoxide and particulate matter (p. 19). In addition, formaldehyde and hexane emissions are likely to fall well within the state' air quality standards.

The report concludes: "Indeed, for all pollutants, there can be no adverse disproportionate impacts on an environmental justice community, because the Station's emissions are not expected to have adverse health impacts on any community, including sensitive populations (p. 28)."

A public health report submitted by an MVP consultant, Green Toxicology, LLC, performed additional modeling to demonstrate that emissions from the compressor station of sulfur dioxide, nitrogen dioxide, particulate matter, carbon monoxide and HAPs pose little health risk to the surrounding EJ community. It concludes:

"Taken together, the available air quality data, models, and estimated risks to the health from air emissions indicate that the health of people living near the proposed Lambert Compressor Station is not currently being compromised by the quality of outdoor air; and if the proposed station were to be built and operating, this situation would not change (p. 15)."

https://drive.google.com/file/d/13MfOb4Wt6m8bRN03_YRJEiXdXNh1v7n/view

In sum these reports represent a slam dunk for the Lambert Compressor Station. Yet the existence of an EJ community coupled with the precedent established by the Buckingham decision (*Friends of Buckingham v State Air Pollution Control Bd.*, 947 F.3d 68 (4th Cir. 2020)), and the applicant's own track record indicate that a higher level of scrutiny is required to justify an air permit for it.

Specifically, the Air Pollution Control Board should review the modeling analyses that were done by MVP and Green Toxicology. They should not take the numbers reported by therein at face value.

In this connection a report by the Southwest Pennsylvania Environmental Health Project put the nail on the head:

"Much of the exposure research done to date has either measured the concentrations of compressor station emissions averaged over 12- or 24-hour periods, or calculated yearly total emissions, neither of which are particularly effective at linking immediate respiratory symptoms to acute exposures. Few have investigated these chemical emissions on a shorter time scale, though there are many anecdotal reports of acute symptoms associated with blowdowns, or with close residential proximity to compressor stations. Measuring emissions on a much shorter time scale, averaged over the minute or quarter-hour, would provide a more accurate measure of the acute exposures people are receiving, and may help link respiratory outcomes with measured exposures (p.4)."

<https://www.environmentalhealthproject.org/sites/default/files/assets/downloads/a-brief-review-of-compressor-stations-11.2015.pdf>

If DEQ and/or the VA Air Pollution Control Board establishes that the intervals modeled did not provide for accurate assessment of the impacts of acute exposures, then the reports' determination of no significant impact from compressor station emissions would be invalidated.

Archived: Thursday, April 8, 2021 10:10:06 AM
From: [William Pace](#)
Sent: Wednesday, April 7, 2021 6:52:12 PM
To: anita.walthall@deq.virginia.gov
Subject: Please Support the MVP Southgate air permit
Importance: Normal

I write to you in support of Mountain Valley Pipeline (MVP) Southgate's air permit for the Lambert Compressor Station. It is no secret that our region needs more natural gas because it's cheap and we have a lot of it in the United States and MVP Southgate is the safest and most efficient way to bring it to homes and businesses, much safer than delivering natural gas by motor vehicles.

The Department of Environmental Quality (DEQ) has reviewed the project application and concluded that it will result in no adverse impacts on air quality in the area surrounding the proposed station. This is an especially important factor in approving this. I have observed those at MVP Southgate being active in our community, sponsoring events and holding meetings to make sure people know about them and their work. This project will generate new tax revenue and economic opportunity, and most people won't even know it is operating. I hope that you will approve the permit to allow this much needed station.

Will Pace
Chatham, VA

Archived: Thursday, April 8, 2021 10:10:06 AM
From: skctcob@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 6:23:57 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Stephanie Clark
3907 Amberleigh Blvd
N. Chesterfield VA, 23236-1248

Archived: Thursday, April 8, 2021 10:10:08 AM

From: [ECJ NAACPVA](#)

Sent: Wednesday, April 7, 2021 5:41:55 PM

To: anita.walthall@deq.virginia.gov

Subject: Air Quality Permit Registration Number 21652, Mountain Valley Pipeline LLC, Lambert Compressor Station, 987, Chatham VA 24531

Importance: Normal

Attachments: [VirginiaNAACP_Letter_030821_VirginiaDEQ.pdf](#) ;

Good Day Ms. Walthall,

On behalf of the Virginia State Conference NAACP, I would like to submit the following comments concerning the Air Quality Permit Registration Number 21652, Mountain Valley Pipeline LLC, Lambert Compressor Station, 987, Chatham VA 24531.

The Virginia State Conference of the National Association for the Advancement of Colored People (Virginia NAACP) supports the Pittsylvania County NAACP's request that the Virginia Department of Environmental Quality deny the Minor New Source Review Permit (air permit) requested by the Mountain Valley Pipeline and elevate the permitting process to the Air Pollution Control Board for further evaluation. At the onset of the new permitting process, we also request that the Pittsylvania County NAACP be contacted early and made an active participant and local expert in the future consideration and assessment of the proposed siting and permitting review process of the Lambert Compressor Station.

Thank you,
Karen Campblin, Chair
Environmental and Climate Justice
VSC NAACP



NAACP

Virginia
STATE CONFERENCE

Robert N. Barnette, Jr.
President

Da'Quan Marcell Love
Executive Director

March 8, 2021

Anita Walthall
Virginia DEQ
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
Phone: 540.562.6769
Email: anita.walthall@deq.virginia.gov

Delivered via Email

Re: Air Quality Permit Registration Number 21652, Mountain Valley Pipeline LLC, Lambert Compressor Station, 987 Transco Road, Chatham VA 24531

Dear Ms. Walthall,

The Virginia State Conference of the National Association for the Advancement of Colored People (Virginia NAACP) supports the Pittsylvania County NAACP's request that the Virginia Department of Environmental Quality deny the Minor New Source Review Permit (air permit) requested by the Mountain Valley Pipeline and elevate the permitting process to the Air Pollution Control Board for further evaluation. At the onset of the new permitting process, we also request that the Pittsylvania County NAACP be contacted early and made an active participant and local expert in the future consideration and assessment of the proposed siting and permitting review process of the Lambert Compressor Station.

The Virginia NAACP is disheartened by reports from the Pittsylvania County NAACP Branch that the current permitting process for the Lambert Compressor Station Air Permit Application process did not include involvement from the NAACP community until the end of the project when opportunities to collect influencing public feedback had passed. This was especially problematic for the individuals who own property, and a family business, directly adjacent to the proposed location site, who were not contacted.

Meaningful and intentional communications should have been made to individuals who would be directly impacted by the proposed compressor station (especially those located within the Blairs and Pittsylvania communities). Meaningful and intentional communication is to not only notify the public of any proposed project, but to educate them about the project's needs, impacts, or benefits, and solicit informed and active participation in the decision-making process.

The Community Impact Assessment report indicated that the “*majority of the respondents were not familiar with the proposed Station*”. The report further states, “*...but of those who were familiar, a majority of non-indigenous respondents expressed comfort with the proposed location, citing its proximity to another existing Compressor Station and appreciation Mountain Valley’s use of existing corridors and already impacted landscapes.*” These comments are not to be celebrated or a nod to an equitable location analysis and siting process, but to show not enough information about potential emissions and air pollutants was provided during the 30-minute interview session. For a project of this magnitude and longevity, at a minimum, two town meetings should have been held along with multiple contacts with key stakeholders, property owners, business, and community service providers.

Toxic cumulative and indirect impact considerations and existing levels of air pollution must also be considered. If this Compressor Station is built at the proposed site, which is within close proximity to two existing Transco compressor stations, the combined emissions will place the health and safety of the community at substantial risk. The proposed Lambert station would increase the emissions of particulate matter in the area by 30%. Air Quality was a major concern raised by the Virginia NAACP during the Union Hill/Buckingham County Atlantic Coast Pipeline, and is presented here again by the Pittsylvania County NAACP branch. This is an environmental injustice that is commonly performed when siting noxious facilities in communities of color.

“On January 7, 2020, the 4th Circuit Court of Appeals revoked an air permit issued to Dominion Energy for a compressor station in the predominantly African American community of Union Hill in Buckingham County despite stringent air quality requirements, stating “What matters is whether the (Air Pollution Control Board) has performed its statutory duty to determine whether this facility is suitable for this site, in light of [environmental justice] and potential health risks for the people of Union Hill. It has not.”

Excerpt from Pittsylvania County NAACP comments.

NAACP, in partnership with the Clean Air Task Force and the National Medical Association, released, “Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil and Gas Facilities on African-American Communities.” The report quantified the elevated health risks that communities of color face due to pollution from nearby oil and gas facilities and found that African Americans are exposed to 38 percent more polluted air and are 75% more likely to live in fence-line communities. These burdens should be taken seriously and avoided.

“The life-threatening burdens placed on communities of color near oil and gas facilities are the result of systemic oppression perpetuated by the traditional energy industry, which exposes communities to health, economic, and social hazards.” NAACP, Fumes Across the Fenceline¹

¹ <https://www.naacp.org/climate-justice-resources/fumes-across-fence-line/>

Ms. Anita Walthall, Virginia DEQ

March 8, 2021

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While African-Americans endure most of the harmful impacts of traditional energy production, communities of color reap few, if any, of the benefits. We must do all we can to prevent the Pittsylvania community, and many others around the Commonwealth, from becoming Sacrifice Zones. Sacrifice Zones are hot spots of pollution where typically communities of color and low-income communities live, work, or, and play in areas directly adjacent to heavily polluted industries.

Yes, the environmental and energy justice issues are multilayered but the approach to tackling these issues must also be multilayered and well-planned with strong efforts to mitigate and reduce threats from adverse impacts, particularly in already burdened communities.

Conclusion

The Virginia NAACP stands behind all comments submitted by the Pittsylvania County NAACP branch on March 3, 2021 and support the branch's requests:

Request that DEQ Refer the Draft Permit to the Air Pollution Control Board

We, the Pittsylvania County Branch of NAACP request that DEQ deny the MVP Lambert Compressor Station air permit and elevate the permit review to the Air Pollution Control Board. We further ask that DEQ and the Air Board set a strong precedent for ensuring environmental justice by conducting a thorough and unbiased evaluation of environmental justice communities in Pittsylvania County and the cumulative and combined effects of existing and proposed compressor stations on these communities.

The Federal Energy Regulatory Commission (FERC) granted conditional approval for construction of MVP Southgate Project, including the Lambert Compressor Station, in June 2020, stating that no construction begin until MVP obtains essential federal permits for the MVP Mainline and receives permission to restart construction halted due to poor performance and numerous lawsuits. MVP has not met these conditions. There is tremendous uncertainty as to when, or even if, the MVP Mainline will be completed.

DEQ and the Air Board does not need to rush the air permit review for the Lambert Compressor Station, which has no purpose if the MVP Mainline is abandoned.

DEQ and the Air Board should:

- Identify environmental justice communities affected over the sixty years that Transco has operated here in Pittsylvania County, communities now at increased risk from an MVP compressor station;
- Bring these communities into the decision-making process; and
- Evaluate the cumulative and combined, past and future effects of the Transco and MVP compressor stations.


Ms. Anita Walthall, Virginia DEQ

March 8, 2021

Page 4 of 4

The DEQ and the Air Board does not need to patronize residents of Pittsylvania County with assurances that a new compressor station would not impact air quality.

Sincerely,

A handwritten signature in black ink that reads "Robert Barnette". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Robert Barnette, President

Virginia NAACP

A handwritten signature in blue ink that reads "Karen Campblin". The signature is cursive and somewhat stylized.

Karen Campblin, Chair

Virginia NAACP

Environmental and Climate Justice

Archived: Thursday, April 8, 2021 10:10:09 AM
From: kelsey.threatte@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 4:18:48 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Kelsey Romano
12768 Berlin Tpk,
Lovettsville VA, 20180-2000

Archived: Thursday, April 8, 2021 10:10:09 AM
From: jjluecke98@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 3:17:57 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Julianna Luecke
1712 Valhalla Arch
Virginia Beach VA, 23454-2529

Archived: Thursday, April 8, 2021 10:10:09 AM
From: jjluecke98@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 3:17:45 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Julianna Luecke
1712 Valhalla Arch
Virginia Beach VA, 23454-2529

Archived: Thursday, April 8, 2021 10:10:10 AM
From: kindred12u@hotmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 3:14:47 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Suzanne Hurley
4124 Meadow Hill Lane
Fairfax VA, 22033-3112

Archived: Thursday, April 8, 2021 10:10:10 AM
From: janicegbrown@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 2:41:40 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Janice Brown
8002 Maplewood Drive
Manassas VA, 20111-2216

Archived: Thursday, April 8, 2021 10:10:11 AM
From: sej219@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 2:25:47 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Sarah Jordan
6294 Jordan dr
Warrenton VA, 20187-7751

Archived: Thursday, April 8, 2021 10:10:11 AM
From: mollee.sullivan@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 2:04:56 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Mollee Sullivan
14203 Birnam Woods Dr.
Midlothian VA, 23112-4140

Archived: Thursday, April 8, 2021 10:10:11 AM
From: 1144jfreeman@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 1:56:42 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Judith Freeman
1144 Hearthglow Ct
Charlottesville VA, 22901-1277

Archived: Thursday, April 8, 2021 10:10:11 AM
From: shae.savoy@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 1:54:53 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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Sincerely,

Shae Savoy
5406 Ready Avenue
Baltimore MD, 21212-3929

Archived: Thursday, April 8, 2021 10:10:11 AM
From: tom0261888@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 1:34:46 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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Sincerely,

Thomas Smith
2523 Rosalind Ave
Roanoke VA, 24014-2370

Archived: Thursday, April 8, 2021 10:10:12 AM
From: ann.marckesano@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 1:31:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Ann Marckesano
11112 Burywood Lane
Reston VA, 20194-1412

Archived: Thursday, April 8, 2021 10:10:12 AM
From: llwestva@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 1:27:40 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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Sincerely,

Lynda West
6341 Crosswoods Drive
Falls Church VA, 22044-1209

Archived: Thursday, April 8, 2021 10:10:12 AM
From: sapnabatish@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 1:08:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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Sincerely,

Sapna Batish
11601 Springhouse Place
Reston VA, 20194-1164

Archived: Thursday, April 8, 2021 10:10:15 AM
From: dsmythfreeman@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 12:51:43 PM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

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As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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Compressor stations like these can emit particulate matter, benzene, formaldehyde and nitrous oxide, which are associated with negative health effects like asthma, heart attacks, and cancer. In the DEQ's own draft review, it notes that Lambert's emission of fine particulate matter, which would increase particulate matter pollution in the area by 30%, exceeds the respective permitting threshold. This compressor station would also put the community at an increased risk of dangerous explosions and gas leaks.

Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Debbie Freeman
5109 Falcon Ridge Road
Roanoke VA, 24018-8620

Archived: Thursday, April 8, 2021 10:10:15 AM
From: heirloomkitchen=embarqmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 12:44:43 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Christine Ilich
PO Box 605
Flint Hill VA, 22627-0605

Archived: Thursday, April 8, 2021 10:10:15 AM
From: dmmeyer=email.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 12:34:49 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Sincerely,

Derek Meyer
3103 Circle Hill Road
Alexandria VA, 22305-1607

Archived: Thursday, April 8, 2021 10:10:15 AM
From: leoglesby3@gmail.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 12:34:41 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Lynne Oglesby
317 Central Parkway
Newport News VA, 23606-3725

Archived: Thursday, April 8, 2021 10:10:16 AM
From: josie=peninsulaindivisible.com@mg.gospringboard.io
Sent: Wednesday, April 7, 2021 12:33:19 PM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Josie Taylor-soltys
5908 Meriwether Court
Williamsburg VA, 23188-7374

Archived: Friday, April 9, 2021 3:27:38 PM
From: lctjosecruz@gmail.com@mg.gospringboard.io
Sent: Thursday, April 8, 2021 3:59:41 AM
To: [Anita Walthall](#)
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Jose Cruz
1580 Kingstream Circle
Herndon VA, 20170-2752

Archived: Friday, April 9, 2021 3:27:38 PM

From: admin@tightsqueezehardware.com

Sent: Thursday, April 8, 2021 9:10:20 AM

To: anita.walthall@DEQ.virginia.gov

Subject: MVP Southgate compressor station

Importance: Normal

Attachments:

[Dan Lambert remarks 02-08-2021.docx](#) ;

RE: Proposed MVP Southgate air permit

My name is Dan Lambert. I have lived in the town of Chatham, Va for many years and have raised a family here. My wife and I are owners of Tightsqueeze Hardware in Pittsylvania County, just outside of Chatham.

We are big fans of natural gas in our household. We have heated the hardware store with natural gas for years and just this winter we replaced our home heating system to take advantage of the efficiency and lower cost that natural gas offers.

As a local business owner, I am well aware of the economic advantages the pipeline industry has brought to our area. Tightsqueeze Hardware benefits greatly from expansions and maintenance of the pipelines and compressor stations. We know that Mountain Valley Pipeline is committed to supporting local businesses, we've seen it firsthand.

Small businesses are built on relationships, both with other businesses and with the people they bring into the community. Our dealings with Mountain Valley Pipeline and with their many employees have always been a pleasure and **we** look forward to being a part of **their** success for many years to come.

The tax revenue from the construction and ongoing operations of the Compressor Station will be a real economic boon to Pittsylvania County.

I fully support Mountain Valley Pipeline's request for a new permit to build the Lambert Compressor Station.

Daniel S Lambert
73 N Main St
Chatham, Va 24531
434-688-1299

Archived: Friday, April 9, 2021 3:27:38 PM
From: [Elle De La Cancela](#)
Sent: Thursday, April 8, 2021 4:12:40 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal
Attachments:
[CCAN Lambert Compressor Station Technical Comment.pdf](#);

Dear Ms. Walthall,

Attached is the Chesapeake Climate Action Network's organization technical comment on the Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit. Thank you for your consideration and we look forward to hearing DEQ's decision.

Respectfully,
Elle De La Cancela

--
Elle De La Cancela
Pronouns: she/her/hers
Central Virginia Grassroots Organizer
Chesapeake Climate Action Network & CCAN Action Fund
Cell: (804) 723-0441
Email: elle@chesapeakeclimate.org
www.chesapeakeclimate.org
[Like us on Facebook!](#)

Anita Walthall
Virginia Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153;
Email: anita.walthall@deq.virginia.gov

Re: Minor New Source Review Permit for the Lambert Compressor Station

Dear Ms. Walthall:

On behalf of the Chesapeake Climate Action Network ("CCAN"), I write to ask the Virginia Department of Environmental Quality ("DEQ") to bring the application for a Minor New Source Review Permit for the Lambert Compressor Station before the full Air Pollution Control Board ("Air Board"). We are confident that a complete review of the proposal will result in the Air Board denying the permit.

CCAN is a regional organization that attacks climate change and fights for environmental justice in the Chesapeake region. We represent approximately 27,000 members in Virginia alone, including in Pittsylvania County. For the reasons set forth below, we strongly believe that further review of the project by the Air Board coupled with improved transparency and meaningful participation from the community will make it clear that the permit should be denied.

A. Air Pollution Concerns are Significant and Warrant Consideration by the Air Board

Mountain Valley Pipeline LLC ("MVP") has applied for a new permit to build the Lambert Compressor Station. The proposed compressor station will power the MVP Southgate extension project ("MVP Southgate") and will consist of two combustion turbines, five microturbines and other ancillary equipment. The compressor station would emit a number of hazardous air pollutants that pose a danger to public health. The environmental review of MVP Southgate revealed that the compressor station will emit benzene, toluene, and xylenes,¹ all of which can cause adverse health effects. Yet these hazardous air pollutants are not listed in this draft air permit.² MVP projects that the Lambert compressor station will emit over 69 pounds of benzene annually.³ Acute chronic exposure (0.1 to 0.5 ppm) to benzene can reduce white blood cell counts, which is the most common indicator for leukemia risk.

¹ Fed. Energy regulatory Comm'n, MVP Southgate Project, Docket No., CP19-14-000, Post-Application Environmental Information Request #2, Attachments, at Table B-11, http://www.mvpsouthgate.com/wp-content/uploads/2019/05/MVP-Southgate-EIR-2_Attachments_5-13-19.pdf

² See <https://www.deq.virginia.gov/home/showpublisheddocument?id=2531>.

³ Fed. Energy regulatory Comm'n, MVP Southgate Project, Docket No., CP19-14-000, Post-Application Environmental Information Request #2, Attachments, at Table B-11, http://www.mvpsouthgate.com/wp-content/uploads/2019/05/MVP-Southgate-EIR-2_Attachments_5-13-19.pdf

Formaldehyde is also a concern at the proposed plant. MVP predicts that the Lambert compressor station will emit almost 3.5 tons of formaldehyde per year,⁴ on top of the background emissions from the nearby Transco compressor stations 165 and 166.⁵ Formaldehyde in the air can lead to nasal and skin irritation as well as breathing problems. The pollutant can also increase complications of existing chronic obstructive pulmonary disease (“COPD”) and asthma. Higher concentrations of formaldehyde can lead to tumor formation and pulmonary edema.

The proposed Lambert station would significantly increase the emissions of particulate matter in the area.⁶ The percentage of people over the age of 65 in the nearby community (23.3%) is significantly higher than the state (15.9%) and national average (15.2%).⁷ Older people are more vulnerable to particulate matter pollution, especially with increased rates of cardiorespiratory mortality and hospitalization. Chronic levels of air pollution, such as particulate matter, can also increase the rates of respiratory tract infections such as pneumonia.

The potential for air pollution at this site is significant, especially when you factor in existing emissions from the nearby Transco compressor stations. Given the makeup of the nearby population, which is uniquely vulnerable to air pollution, and the lack of complete information in the permit application, we believe the Air Board should have the opportunity to analyze the permit more thoroughly.

B. A Compressor Station to Nowhere

The proposed Lambert Compressor Station will power the MVP Southgate project. The MVP Southgate would receive gas from the MVP Mainline in Pittsylvania County, Virginia and extend approximately 75 miles south to new delivery points in North Carolina. The sole purpose of MVP Southgate, therefore, is tied to the MVP Mainline. The MVP Mainline, however, is in jeopardy. Several federal permits necessary for the construction of the MVP Mainline project have been suspended or are pending, with some in litigation. In addition, the Federal Energy Regulatory Commission (“FERC”) has issued a stop-work order on the currently incomplete MVP Mainline project. The project is billions of dollars over budget and years behind schedule.

Neighboring North Carolina rejected a permit for MVP Southgate due to the precariousness of the MVP Mainline. That state’s Department of Environmental Quality (“NC DEQ”) reasoned that “the proposed MVP Southgate project is inextricably linked to, and

⁴ Federal Energy Regulatory Comm’n, Final Environmental Impact Statement (“FEIS”) for the Southgate Project, Table 4.11-3 (Feb. 2020).

⁵ Mountain Valley’s Air Quality Dispersion Modeling Report was filed on February 3, 2020 (accession number 20200203-5194). This file can be viewed on the FERC website at <http://www.ferc.gov>. Using the “eLibrary” link, select “Advanced Search” from the eLibrary menu and enter the accession number in the “Numbers: Accession Number” field.

⁶ FEIS, at Table 4.13-6.

⁷ US Census Bureau. (2019, July 1). U.S. census bureau QuickFacts: PITTSYLVANIA County, Virginia. Retrieved April 8, 2021, from <https://www.census.gov/quickfacts/pittsylvaniacountyvirginia>.

dependent upon, completion of the under-construction . . . MVP Mainline”⁸ The NC DEQ denied Mountain Valley’s application for approval of MVP Southgate under the Clean Water Act and state law because “[t]he uncertainty of the MVP Mainline project’s completion presents a critical risk to the achievability of the fundamental purpose of MVP Southgate.”⁹ The U.S. Court of Appeals for the Fourth Circuit found that North Carolina did indeed have the authority to reject the permit, but sent the permit back to the agency to better explain the reasoning behind its denial.¹⁰

We should take a note from our neighbors and proceed with caution. MVP has indicated that it plans to begin construction on its Southgate project as *soon* as it gets the necessary permits; that is, it does not intend to wait for the MVP Mainline to be cleared before commencing work on MVP Southgate.¹¹ By permitting the Lambert Compressor Station, Virginia could be authorizing construction on a facility that will never be used. The Air Board should seriously consider the risk of approving a compressor station to nowhere.

Environmental Justice and Outreach Concerns

The public comment process was rife with procedural issues. Agencies did not reach out to all the relevant stakeholders. For example, outreach to the Pittsylvania chapter of the NAACP was woefully inadequate. According to the Pittsylvania NAACP’s written comments to the DEQ:

“MVP’s environmental justice consultant did not contact us, the local Pittsylvania Branch NAACP, at all, and neither MVP nor DEQ contacted us until December 2020. We strongly hold that affected and vulnerable community residents of Pittsylvania County have not had access and opportunities to participate in the full cycle of the decision-making process about the MVP Southgate project, including the Lambert Compressor Station.”¹²

This inadequate outreach to a key stakeholder points to deficiencies in the public outreach process as a whole.

⁸ Smith, D. (2020, August 11). North Carolina DENIES 401 cert. in a Pipeline case. Retrieved April 08, 2021, from <https://files.nc.gov/ncdeq/pipelines/2018-1638v3-MVP-Southgate---Rockingham-Alamance---Denial.pdf>.

⁹ *Id.*

¹⁰ Mountain Valley Pipeline, LLC v. N.C. Dept. of Env’tl. Quality, --- F.3d ---, 2021 WL 922110, *1 (4th Cir. 2021).

¹¹ Smith, D. (2020, August 11). North Carolina DENIES 401 cert. in a Pipeline case. Retrieved April 08, 2021, from <https://files.nc.gov/ncdeq/pipelines/2018-1638v3-MVP-Southgate---Rockingham-Alamance---Denial.pdf>. (“As noted in [MVP’s] June 26, 2020 Response to Request for Additional Information request, [MVP] intends to begin construction on the MVP Southgate project immediately once all necessary permits are in place, irrespective of the completeness of the MVP Mainline project.”)

¹² Chatham Star Trib., *Pittsylvania NAACP asks DEQ to refer MVP air permit to Air Pollution Control Board*, Mar. 8. 2021.

Due to the global pandemic, the vast majority of outreach was conducted over the internet, which puts communities with limited internet access at a disadvantage. The area surrounding the proposed compressor station is essentially a broadband desert. In the third-party Community Impact Assessment, Dr. Alexa Lawrence reports that 264 emails sent to community members resulted in only six interviews.¹³ While other methods yielded better results, in total only 18 interviews were carried out. Even Dr. Lawrence, the author of the report, acknowledged that the number of interviews conducted did not meet the standard of a rigorous academic study.¹⁴ This permit review should not be rushed through with such limited community engagement.

Moreover, MVP's permit application misrepresents the extent of environmental justice concerns. Virginia law prohibits new infrastructure from having a disproportionate impact on minority and low-income communities.¹⁵ The proposed site of this new compressor station is already burdened by two existing compressor stations and is economically depressed.¹⁶ Dr. Lawrence's analysis found four different environmental justice communities within a three-mile radius of the proposed compressor station. Yet, MVP's permit application identifies no environmental justice communities because the company narrowed the field from a three-mile radius to a mile radius. The application is further flawed in that it relies on EJScreen and census tract data, which obscure smaller yet still vulnerable populations.

Failure to fully consider environmental justice concerns could result in the permit being thrown out in court. The DEQ and the Air Board have been faulted before by the Fourth Circuit for its failure to properly consider environmental justice. "[E]nvironmental justice is not merely a box to be checked,"¹⁷ the court concluded. In vacating the permit for a separate compressor station in Union Hill, Virginia, the Fourth Circuit relied on the Virginia statutory provision requiring consideration of site suitability.¹⁸ "Indeed," wrote the Fourth Circuit, "under Virginia law, the Board is required to consider 'character and degree of injury to . . . health,' and 'suitability of the activity to the area.'"¹⁹ The federal appeals court faulted Virginia's initial environmental justice review for (a) failing to make "any findings regarding the character of the local population at Union Hill"; (b) failing to individually consider the potential degree of injury from air pollution to the specific local population; and (c) *relying on evidence that was either incomplete* or had been discounted by subsequent evidence.²⁰ Relying on an incomplete permit application or even 18 hastily conducted interviews to form the basis of an environmental justice review opens Virginia up to some of the same issues that plagued its consideration of Dominion's compressor station in Union Hill.

¹³ Community Impact Assessment, at p.38, <https://www.deq.virginia.gov/home/showdocument?id=5326>.

¹⁴ *Id.* at 3 ("the number of interviews may not be consistent with an academic study . . .").

¹⁵ See Va. Code §§ 67-101 (establishing requirements for renewable energy consumption) and 67-102(8) ("[I]t shall be the policy of the Commonwealth to [e]nsure that development of new, or expansion of existing, energy resources or facilities does not have a disproportionate adverse impact on economically disadvantaged or minority communities").

¹⁶ Community Impact Assessment, at p.20, <https://www.deq.virginia.gov/home/showdocument?id=5326>.

¹⁷ *Friends of Buckingham v. State Air Pollution Control Board*, 947 F.3d 68, 92 (4th Cir. 2020)

¹⁸ Section 10.1-1307(E) of the Virginia Code.

¹⁹ *Friends of Buckingham*, 947 F.3d at 87 (citing Va. Code Ann. § 10.1-1307(E)).

²⁰ *Id.* at 86 (emphasis added).

Finally, as indicated by the Fourth Circuit decision referenced above, Virginia is required to consider site suitability when examining this application. This community is already subject to the impacts of two compressor stations and, if this proposal is approved, would be home to three separate compressor stations. The presence of four environmental justice communities coupled with a significant elderly population raises serious questions about the suitability of the site. Finally, the claim in the updated public health amendment that the rural landscape will offset some of the mental health ramifications of building the new project is frankly offensive. If community members chose to live in this area due to its rural nature, the construction of an additional compressor station, on top of the two already here, would further detract from the peaceful countryside.

The big picture is that fossil fuels are on their way out. The Biden Administration has declared climate change an existential threat and has articulated plans to move away from fossil fuels. With increased interest, funding, and desire for renewables on the federal front, Virginia should not continue to permit infrastructure that runs counter to federal policy. Not only does this project conflict with a national clean-energy vision, but Virginia's elected officials last year passed the Virginia Clean Economy Act, which requires carbon neutrality by 2050. Approving this project would continue to kick the ball down the road when the goal is in the other direction.

Thank you for your consideration.

Sincerely,

Elle De La Cancela
Central Virginia Grassroots
Organizer
Chesapeake Climate Action Network
109 N. Rowland St Apt A
Richmond, VA 23220
elle@chesapeakeclimate.org

Anne Havemann
General Counsel
Chesapeake Climate Action Network
6930 Carroll Avenue, Suite 720
Takoma Park, MD 20912
anne@chesapeakeclimate.org

Archived: Friday, April 9, 2021 3:27:38 PM
From: roneydbl@gmail.com@mg.gospringboard.io
Sent: Thursday, April 8, 2021 9:57:43 AM
To: Anita Walthall
Subject: Deny Permit No. 21652 for the Lambert Compressor Station
Importance: Normal

Dear Ms. Walthall,

As a resident of Virginia, I urge you to deny the proposed Lambert Compressor Station an air permit which would allow the facility to emit dangerous pollution, impacting nearby communities.

The communities closest to the compressor station have been identified as environmental justice communities, meaning that the Department of Environmental Quality must take extra precautions to protect this area's right to clean air and water -- including having a public hearing in front of the full Air Pollution Control Board. Already these families are experiencing the detrimental impacts from the existing Transco Compressor Station. Burdening them with pollution from yet another facility would be unconscionable.

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Further, it makes no sense to approve the Lambert Compressor Station permit while the Mountain Valley Pipeline's main line construction has been delayed for more than three years and is billions over budget, signaling that MVP could soon be a stranded asset. On top of that, compressor stations like Lambert contribute to the climate crisis by emitting greenhouse gases and locking our state into decades more of fossil fuel infrastructure.

For these reasons and to protect our environment and local communities' right to clean air and water, I urge DEQ to deny this permit -- or at the very least, have a permit hearing in front of the full Air Pollution Control Board.

Sincerely,

Deborah Roney
516 Brentwood Court
Vienna VA, 22180-4186

Archived: Friday, April 9, 2021 3:27:39 PM
From: [Herndon Jr, Eddie](#)
Sent: Thursday, April 8, 2021 10:25:50 AM
To: anita.walthall@DEQ.virginia.gov
Subject: MVP Southgate compressor Station
Importance: Normal
Attachments:
[MVP Southgate air permit complete.docx](#) ;

Anita,

I have attached my letter of support for this project.

Thank You,

John E. Herndon, Jr.

John (Eddie) Herndon, Jr | Area Vice President
First Citizens Bank
530 Main Street, Danville VA 24541

434-791-6827 Office
434-548-8696 Cell
984-867-4788 Fax



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Environmental
Journal

Volume 10
Number 1
Spring 2000

To: Anita Walthall

Department of Environmental Quality, The Blue Ridge Regional Office
901 Russell Drive
Salem VA 24153

Re: MVP Southgate compressor Station

My name is John E. Herndon Jr. and I am the Area VP for First Citizens Bank, Central VA. I am a resident of Chatham VA and have lived in this area all my life (60+ years). I am writing to you in support of MVP Southgate's Lambert Compressor Station and its draft air permit.

The increase in natural gas usage and decrease in coal usage has helped reduce carbon emissions in the U.S. We must continue to decrease carbon emissions and I fully support combatting climate change by making greater use of domestic natural gas. The MVP Southgate project is needed for this reason and others, not to mention the economic benefits that come with greater supplies of clean-burning, affordable, domestic natural gas.

The Lambert Compressor Station will be built in an area that is appropriate for such a use. The station will include stringent controls that will prevent any adverse impacts on air quality in the area.

Once the project is complete, it will have a positive economic impact throughout the region by paying more taxes to the county government and providing our region with greater access to a more affordable, cleaner fuel that homes and businesses need. As a long time banker in this community I know that a project such as this one is a game changer and much needed.

Please approve the MVP Southgate application for an air permit for the Lambert Compressor Station.

THANK YOU FOR YOUR CONSIDERATION,

John, E. Herndon, Jr.
33 Hargrave Blvd.
Chatham VA 24531
434-548-8696

Archived: Friday, April 9, 2021 3:27:39 PM
From: [Shani Shorter](#)
Sent: Thursday, April 8, 2021 2:24:19 PM
To: anita.walthall@deq.virginia.gov
Subject: MVP Southgate (Lambert Air Permit)
Importance: High
Attachments:
[DEQ.LOS.04-08-21.pdf](#);

Dear Ms. Walthall,

Please find the attached letter from Delegate Les Adams in reference to the MVP Southgate – Lambert Air Permit.

Thank you for your attention to this matter. Please feel free to contact me with any questions.

Kindest regards,

Shani Shorter
Legislative Assistant

The Office of Delegate Les R. Adams
16th House District
P.O. Box K
Chatham, Virginia 24531
(434) 432-1600 – Chatham
(804) 698-1016 – Richmond



image001.jpg



image002.jpg

image003.jpg



image004.jpg





COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

LES R. ADAMS
POST OFFICE BOX K
4 NORTH MAIN STREET
CHATHAM, VIRGINIA 24531

SIXTEENTH DISTRICT

COMMITTEE ASSIGNMENTS:
PRIVILEGES AND ELECTIONS
COURTS OF JUSTICE
TRANSPORTATION

April 8, 2021

Anita Walthall
Virginia Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Drive
Salem, Virginia 24153

Re: MVP Southgate – Review Permit

Dear Ms. Walthall:

As the elected member of Virginia's General Assembly representing the people of the 16th House District, which includes the town of Chatham, please accept this letter in support of Mountain Valley Pipeline's permit application to operate the proposed compressor station in Pittsylvania County.

From my perspective, I can report that this project enjoys widespread support in the community. This is especially evident with respect to its promotion by local leaders who anticipate additional tax revenue upon its completion. Furthermore, the fact that Transco has safely operated a compressor station in the same vicinity enhances the public's confidence in this proposal.

Therefore, in consideration of the foregoing factors, I respectfully urge approval of the permit now pending before your department.

Sincerely,

Delegate Les R. Adams
16th House District

LRA/sas

Archived: Friday, April 9, 2021 3:27:39 PM
From: tlsmusz@gmail.com
Sent: Thursday, April 8, 2021 12:38:54 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal
Attachments:
[Critique of Draft Permit for Lambert Compressor Station Proposed for Chatham Virginia .pdf](#);

<<...>> Dear Ms. Walthall,

Please respond confirming receipt of this document.

I have had recent computer problems and hope that this is received by you.

Thank you for your work protecting our environment!

Tina L. Smusz, MD, MSPH

5555 Mt Tabor Rd

Catawba, VA

540-320-1567

Critique of Draft Permit for Lambert Compressor Station Proposed for Chatham Virginia

Applicant name and registration number: Mountain Valley Pipeline, LLC, 21652

Facility name and address: 987 Transco Rd., Chatham, Va. 24531

DEQ contact: [Anita Walthall](#), 540-562-6769, [DEQ Blue Ridge Regional Office](#)

Comments by Tina Smusz, MD, MSPH

April 8, 2021

This critique of the Stationary Source Permit Draft for the Lambert Compressor Station in Chatham Virginia focuses on permit deficiencies which have grave implications for the health and wellbeing of both citizens living and working in the surrounding area as well as compressor station workers. This project would severely impact the quality of their environment in multiple ways.

Current statistics on population health for Pittsylvania County residents already portray a picture of a populace suffering numerous health problems with comparatively higher rates of chronic illness than the majority of Virginia counties [Pittsylvania County, Virginia | County Health Rankings & Roadmaps](#). These illnesses include heart and lung disease, both of which are exacerbated by air pollutants which will certainly be increased by the addition of another compressor station – with existing Transco compressor stations – in this relatively small geographic area.

Was the combined impact on air quality of multiple compressor stations even considered by DEQ when crafting this draft permit?

Increased particulate matter in the air (PM₁₀ & PM_{2.5}) which occurs with compressor station activity both causes and exacerbates heart and lung disease. Pregnant women and their fetuses are particularly vulnerable to this contaminant, which will be multiplied with the addition of another compressor station in the area. <https://www.psr.org/wp-content/uploads/2018/05/airborne-particulate-matter.pdf>

Along with customary impacts on air quality, compressor stations generate significant amounts of radioactive deposits known as TENORM¹ – both via their emissions (especially blowdown events) and from contamination of the pigging equipment which is sent through the gas pipeline between compressor stations to inspect and/or clean the pipe [PowerPoint Presentation \(iaea.org\)](#). Radioactive Lead₂₁₀ and Polonium₂₁₀ which travel in the methane stream of “fracked

¹ Technologically Enhanced Normally Occurring Radioactive Material

gas” extracted from deep within the earth are deposited in the sludge that accumulates in the pipe lining <https://www.epa.gov/radiation/tenorm-oil-and-gas-production-wastes>. Therefore, the “smart pig” devices also acquire a measure of radioactivity after transiting many miles of pipe between compressor stations.

The Lambert Compressor Station permit also does not address the issue of radioactivity in the gas plume expelled during “blowdown” operations nor the safe handling and disposal of the radioactive debris associated with the smart pig devices. It is sobering to see no mention of this potential health threat to workers, not to mention innocent citizens living downwind of any of area’s compressor stations. It is likely that the described “inlet air filters” designed to control particulate emissions from the combustion turbines will also collect radioactive debris and pose a hazard to compressor station workers who must perform maintenance associated with them.

The question should be formally addressed in the Compressor Station permit regarding safe and appropriate disposal of the radiation-contaminated debris generated at the station.

Egregiously, the permit draft does not address this dangerous issue of radioactive contamination of air, soil and nearby water.

Blowdowns also release hazardous air pollutants such as formaldehyde and BTEX compounds into the surrounding air <https://www.ingaa.org/File.aspx?id=31571>. All of the BTEX compounds (benzene, toluene, ethylbenzene and xylene) are known carcinogens.

The permit does not address the multitude of negative health impacts for people living near compressor stations. Item #4 states expectations for “good” air pollution control practices – but “good” is a far cry from what is needed for people living in the impacted community.

An important document was published in October 2017 - **Health Effects Associated with Stack Chemical Emissions from NYS Natural Gas Compressor Stations: 2008-2014** – A Technical Report Prepared for the Southwest Pennsylvania Environmental Health Project underwritten by the Park Foundation, authors P.N. Russo & D.O. Carpenter. This document looked at the health impacts of chemical and particulate emissions of 18 compressor stations in New York State. The document verifies that compliance with all air quality requirements is not assurance that compressor stations pose no significant threat to public health. Respiratory, cardiovascular and neurological health effects predominated among residents living near compressor stations.

The following is my commentary and critique of **Process Requirements** for the compressor station as they relate to potential human health impacts.

Section 4e. Emission Controls addresses minimizing emissions during start-up or shutdown using either the manufacturer’s written protocol or undefined “best engineering practices,” and

it is left to the operator to document and explain “the sufficiency of these practices.” This critical piece for protecting the surrounding community’s health via reduction of emissions should have well-defined protocols, parameters, and oversight by appropriate government agencies.

Section 6c. under **Emission Controls** suggests that pig launching and recovery are procedures resulting in significant emissions. I base this supposition on the limit of 2 events per 12 month period (a limit whose reason is not explained in the draft permit). Again, it is concerning that there is no mention of potential radioactivity associated with use of these devices.

Section 6f. states that “the permittee shall vent gas no more than twelve (12) times per year.” Also, “The permittee shall minimize the amount of time for each combustion turbine start-up purge.” There is no mention of DEQ monitoring these events or establishing a maximum duration for each of these highly polluting, noisy and distressing events for people living within close proximity to the compressor station.

Adequate forewarning of the inhabitants living nearest to the compressor station, would allow medically vulnerable people, and those with infants and children to either close up their dwellings or plan to be away from the area to avoid the airborne respiratory toxins emitted during that time period.

Section 7. Emission Controls addresses work practices to reduce emissions from leaks of gas from the facility. There are multiple inadequacies in this section which is a critical piece in protecting the health of the surrounding populace.

Section 7a. puts the onus on the permittee to “develop, maintain, and implement a fugitive emission component monitoring and repair plan.” This implies that there are not established standards and “best practice” requirements for this vital part of compressor station operation.

It specifies that “this plan shall consist of a daily auditory/visual/olfactory inspection program for all fugitive emissions components” which should be “conducted at least five days per week.” A more extensive leak detection survey is only scheduled quarterly. Also concerning is the 60 days grace period allowed for the initial extensive survey – a time during which the surrounding area and compressor station employees could be exposed to harmful emissions.

The rudimentary daily AVO (auditory/visual/olfactory) inspection program has serious built-in weaknesses, in that it relies on an intact olfactory system in the employee doing this cursory monitoring. Up to 19% of the general population (80% over 75 years old) have diminished sense

of smell. It is well known that loss (or reduction) of the ability to smell is also common among the populace who have or had COVID 19 infection [Anosmia and loss of smell in the era of covid-19 | The BMJ](#).

Notably, the methane intended for the Mountain Valley pipeline contains **no added odorant** and has minimal to no hydrogen sulfide content (a naturally occurring odorant in some gas) with resultant odorless, colorless gas. The daily AVO inspection program will therefore be effectively reduced to “A” for auditory, i.e., listening for leaks. Finally, it is concerning that 2 days out of 7, there is no mandatory monitoring per this permit.

Because the COVID pandemic is currently showing no significant sign of abating in the face of new variants, it must be a consideration in the timing of major construction projects such as a new compressor station. Active construction puts local residents at risk of contagion. Moreover, construction workers have one of the lowest rates of COVID vaccination in the nation, [United Contractors Launches "Roll Up Your Sleeves" Vaccination Information Campaign Across Construction Industry | Construction Dive](#).

The dearth of vaccinations in construction workers contributes to the well documented COVID clusters associated with construction sites. [A roundup of coronavirus outbreaks on construction sites | Construction Dive](#). This propensity for COVID spread associated with construction projects should put an indefinite HOLD on Lambert Compressor Station construction even if the permit is granted.

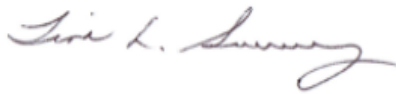
Section 7b. this section begins with allowing up to 3 days after discovery of a leak for the “**first attempt**” (highlighting is mine) *to repair any fugitive emissions component found to be leaking.*” 15 days total is allowed for repair of a discovered leak. Certain leaks warrant delayed repair “*If a leak is found that will emit less natural gas than a facility shutdown, repair may be delayed until the next facility shutdown.....*”). There appears to be no set maximum deadline for repairing the “*long-term leaking fugitive emissions components.*” This section can be interpreted as a license to pollute in small amounts over an extended time.

Compressor Station Emission Limits are established as if each compressor station operates in a void with no consideration of combined emissions from other industry or compressor stations in the nearby area. There is no explicit consideration or adjustment of operations based on their proximity to people’s homes, schools and other occupied buildings. Furthermore, as stated in this permit, “*Limits are a 3-hour average and do not apply during periods of start-up, shutdown, or when ambient temperatures are below 0 degree F.*” If emission limits do not apply during certain periods, it suggests that emissions could attain hazardous levels in the vicinity of the compressor station which should trigger an alert for people living or working nearby.

In conclusion, it can be assumed that all standard language and requirements are elucidated in this draft *Stationary Source Permit to Construct and Operate* a natural gas compressor station.

What cannot be assumed is that the performance standards listed are adequately protective of the health of the environment – including the human beings residing and working nearby.

Methane is rapidly becoming the dinosaur of modern fuel based on evidence of its impact on global warming, and air pollution. There is zero reason to build a soon-to-be defunct piece of fossil fuel infrastructure that will certainly diminish the health of compressor station workers as well as citizens in the surrounding area.

A handwritten signature in cursive script, appearing to read "Tina L. Smusz".

Tina L. Smusz, MD, MSPH

5555 Mt Tabor Rd

Catawba, Virginia 24070

540-552-8763 and 540-320-1567

Archived: Friday, April 9, 2021 3:27:39 PM

From: [Suzanne Keller](#)

Sent: Thursday, April 8, 2021 4:41:32 PM

To: [Walthall, Anita](#)

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Attachments:

[A_Lambert_Keller.pdf](#);

Dear Ms. Walthall,

Please find my comment on the Lambert CS air permit.

Thanks,

Suzanne

A_Lambert_Keller.pdf

APPLICANT NAME AND REGISTRATION NUMBER: Mountain Valley
Pipeline, LLC; 21652

FACILITY NAME AND ADDRESS: Lambert Compressor Station; 987
Transco Road in Chatham, Virginia 24531

My name is Suzanne Keller, I am a retired epidemiologist from the Virginia Department of Health. I reside at 1312 Amherst Ave Richmond, Virginia 23227 804-266-4313. I am deeply concerned for the health of the nearby residents to the proposed Lambert Compressor Station. In light of the recognized dangers of fracked gas infrastructure, including explosions, persistent leaks, peak emissions, and toxic air pollution, my comment will focus on the burden of pollution for the environmental justice populations in the vicinity of the proposed and existing compressor stations.

In Appendix A, I provide data from the engineering analysis for Lambert, Transco 165 and Transco 166. Unfortunately, the data are not entirely comparable, but the best I could glean from DEQ documents. These data must inform any consideration of approval to contribute additional pollutants in this community. If you look at the Transco 165 past potential to emit of criteria and other pollutants you will notice that the new equipment proposed will substantially reduce pollutants with the exception of SO₂ and NH₃. This change in technology at Transco was significant, but when you consider the amount of pollution, including HAPs and particulate matter, the historic hazards from this compressor station cannot be ignored just because improvements were made. The people who were exposed to these hazards are probably still in the community. The cumulative burden of pollution is very concerning and is a hallmark of environmental injustice where hazardous facilities are co-located in communities already burdened by pollution.¹

The engineering analysis argues that there are no adverse health impacts from this project on any resident Virginia, therefore there is no

¹ Morello-Frosch, R. et. al., Understanding The Cumulative Impacts of Inequalities in Environmental Health, Health Affairs 30, No. 5 (2011): 879-887.

disproportionate impact on the nearby residents. Regional measurements of criteria pollutants do not guarantee that there will be no health impacts at the local level. There is nothing in the DEQ analysis that addresses the dose and duration of exposure to harmful pollutants or the vulnerability of residents in the vicinity of the compressor station. Moreover, there is a growing body of evidence that demonstrates harm to vulnerable populations from air pollution that is considered acceptable by the National Ambient Air Quality Standards. In one recent study of the medicare population, slight increases in ozone and PM_{2.5} resulted in excess mortality that was pronounced among men, blacks and poor elders.² Other studies found similar disparities in impact among blacks and the poor as well as excess mortality from PM_{2.5}.^{3,4} In addition to studies showing the harm caused when the NAAQS are met, the American Thoracic Society believes the current NAAQS for particulate matter 2.5 and ozone are too high.⁵

Death is the worst outcome associated with poor air quality. A recent study of VOCs and compressor stations found excess mortality associated with VOCs and most impressively, this study controlled for covariates.⁶ This kind of research substantiates concerns already documented by case studies which have found everything from

² Qian Di, et.al, Air Pollution and Mortality in the Medicare Population, *NEJM* 2017; 376;26.

³ Parker, Jennifer d., et. al. Particulate Matter Air Pollution Exposure and Heart Disease Mortality Risks by Race and Ethnicity in the United States, *Circulation*. 2018;137:1688–1697.

⁴ Maayan Yitshak-Sade, et. al., Estimating the causal effect of annual PM_{2.5} exposure on mortality rates in the Northeastern and mid-Atlantic states. *Environmental Epidemiology* (2019) 3:e052

⁵ <https://www.thoracic.org/about/newsroom/press-releases/journal/2018/thousands-of-lives-would-be-saved-if-counties-met-ats-clean-air-standards.php> accessed 4/8/2021

⁶ Hendryx, M., Luo, J. in publication. Natural gas pipeline compressor stations: VOC emissions and mortality rates. The Extractive Industries and Society, <https://doi.org/10.1016/j.exis.2020.04.011>

exacerbated respiratory problems to neurological ones..^{7, 8}

The Board and DEQ should require MVP to conduct in home monitoring of VOCs and particulate matter to determine the baseline levels at nearby residences. This would insure adequate evaluation of the burden of pollution closest to the proposed compressor station and it would uphold the Board's duty in 1307E to consider 1. The character and degree of injury to, or interference with, safety, health, or the reasonable use of property..... and 3. The suitability of the activity to the area in which it is located.

Particulate matter is arguably one of the most dangerous pollutants that will be emitted from the compressor station. Transco 165 has the potential to emit 35.9 tons per year of particulate matter, Transco 166 4.54 tons per year and Lambert 10.36 tons per year. The only reasonable way to evaluate Lambert is in this context. A recent meta-analysis of 25 years of particulate matter and human mortality found associations with all-cause, cardiopulmonary and lung cancer mortality.⁹ According to Dr. George Thurston, who submitted comment on the Buckingham CS, particulate is more dangerous the closer you are to the source of emissions. Ambient air quality measurements miles away do not adequately measure the risk to those people breathing and living in the shadow of these compressor stations.

⁷ David R. Brown, Lydia H. Greiner, Beth I. Weinberger, Leslie Walleigh & Dale Glaser (2019) Assessing exposure to unconventional natural gas development: using an air pollution dispersal screening model to predict new-onset respiratory symptoms, *Journal of Environmental Science and Health, Part A*, 54:14, 1357-1363, DOI: 10.1080/10934529.2019.1657763

⁸ Blinn HN, Utz RM, Greiner LH, Brown DR (2020) Exposure assessment of adults living near unconventional oil and natural gas development and reported health symptoms in southwest Pennsylvania, USA. *PLoS ONE* 15(8): e0237325. <https://doi.org/10.1371/journal.pone.0237325>

⁹ Pope C, Arden, et.al., Fine particulate air pollution and human mortality: 25+ years of cohort studies. 2019. <https://doi.org/10.1016/j.envres.2019.108924>

Appendix A

Summary of Potential Emissions Increase

The facility's change in PTE is shown in the following table:

Transco - Station 165
 Registration No.: 30864
 Engineering Analysis
 January 28, 2020
 Page 12 of 16

Pollutant	Past PTE (tpy)	Future PTE (tpy)	PTE Change (tpy)
NOx	3,746.1	548.8	-3,197.2
CO	1,026.4	372.6	-653.8
VOC	251.2	100.7	-150.5
PM/PM ₁₀ /PM _{2.5}	60.3	35.9	-24.4
SO ₂	10.1	13.9	+3.8
NH ₃	0	21.5	+21.5
HAP (total)	73.5	24.1	-49.4

Registration No.: 30864- Transco 166
 Engineering Analysis-8/20/2015
 Page 4

Summary of Actual Emissions Increase

Emissions as a result of the project are shown in the table below.

Pollutant	Turbines (tons/yr)	Emergency Generator (tons/yr)	Tanks & Fugitives (tons/yr)	Project Total (tons/yr)	"Significant" Value (TPY)
NOx	37.0	1.33	-	38.33	40
CO	37.5	2.66	-	40.16	100
VOC	4.31	0.67	0.91	5.89	40
SO ₂	1.93	0.0015	-	1.93	40
PM	4.51	0.025	-	4.54	25
PM ₁₀	4.51	0.025	-	4.54	15
PM _{2.5}	4.51	0.025	-	4.54	10

Table 3: Facility Potential to Emit

Pollutant	Past PTE (tpy)	Proposed PTE (tpy)	Change in PTE (tpy)
NO _x	0	12.37	+12.37
CO	0	17.28	+17.28
VOC	0	3.33	+3.33
SO ₂	0	5.39	+5.39
PM/PM ₁₀ /PM _{2.5}	0	10.36	+10.36
HAP (total)	0	4.53	+4.53

Archived: Friday, April 9, 2021 3:27:40 PM
From: [Grace Tuttle](#)
Sent: Thursday, April 8, 2021 5:08:52 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal
Attachments:
[POWHR Lambert Comment 4.2021.pdf](#);

Dear Ms. Walthall,

Please see the attached comment for POWHR. Thank you.

Sincerely,
Grace Tuttle

--

Grace Tuttle
Coordinator
Protect Our Water, Heritage, Rights (POWHR)
POWHR.org // grace@powhr.org
(540) 416-2717
Pronouns: she, her, hers
□

“If citizenship is a matter of shared beliefs, then I believe in the democracy of species. If citizenship means an oath of loyalty to a leader, then I choose the leader of the trees. If good citizens agree to uphold the laws of the nation, then I choose natural law, the law of reciprocity, of regeneration, of mutual flourishing.”

— Robin Wall Kimmerer, *Braiding Sweetgrass: Indigenous Wisdom, Scientific Knowledge and the Teachings of Plants*



Introduction

Protect Our Water Heritage Rights (POWHR) Coalition requests that the Virginia Department of Environmental Quality (DEQ) deny Mountain Valley Pipeline, LLC (MVP)'s application for an air permit to construct and operate the Lambert Compressor Station in Pittsylvania County, east of Chatham outright. POWHR Coalition requests that if DEQ does not deny the permit outright, that they elevate the permit application to the full Air Pollution Control Board for consideration.

The [Code of Virginia](#) indicates this hearing should go forth due to the following procedures:

In section 10.1-1322.01 Permits; procedures for public hearings and permits before the Board:

From subsection C.

The director shall grant a public hearing or Board consideration after the public hearing required by state or federal law or regulation...if the Director finds the following:

1. That there is a significant public interest in the issuance, denial, modification, or revocation of the permit in question as evidenced by receipt of a minimum of 25 individual requests for a public hearing or Board consideration;
2. That the requesters raise substantial, disputed issues relevant to the issuance, denial, modification, or revocation of the permit in question; and
3. That the action requested by the interested party is not on its face inconsistent with, or in violation of, the State Air Pollution Control Law (§ [10.1-1300](#) et seq.), federal law or any regulation promulgated thereunder.
 - a. Wherein, 'air pollution' is defined as: "Air pollution" means the presence in the outdoor atmosphere of one or more substances which are or may be harmful or injurious to human health, welfare or safety, to animal or plant life, or to property, or which unreasonably interfere with the enjoyment by the people of life or property.
 - b. This condition is met by the draft air permit application, as indicated by the Draft Engineering Analysis' acknowledgement of release of: NO_x, CO, unburned hydrocarbons (UHC), sulfur dioxide (SO₂), particulate matter (PM, PM₁₀, and PM_{2.5}), volatile organic compounds (VOC), methane, lead, formaldehyde, hexane, benzene, toluene and xylenes.



Request for Hearing in Front of Full Air Pollution Control Board

POWHR's request for this air permit application to go before a hearing in front of the Full Air Pollution Control Board aligns with several core problems related to this permit application:

1. The Lambert Compressor Station would be the third such natural gas-powered compressor station in this neighborhood. MVP has failed to submit materials that account for cumulative emissions and impact.
2. MVP manipulated the results of their Environmental Justice consultant's evaluation, shrinking and augmenting the threshold and criteria for four Environmental Justice neighborhoods found within a 3-5 mile radius in the initial report down to a one-mile radius, as well as misrepresenting and over-representing their outreach to impacted communities. Many impacted community members and the public at large are still just now learning of this project, and that this would add to existing compressor stations in the immediate vicinity. More startling, the report finds that non-Black, non-Indigenous people feel 'comfort' with this location because it is already home to compressor stations, degraded land and "existing corridors," which is another way to say these respondents feel it is appropriate to continue saddling Environmental Justice communities of color and low income with the burden of fossil-fuel pollution.
 - a. Alexandra Sutton Lawrence, PhD., of Land and Heritage Consulting, LLC (LHC) states that the environmental justice communities identified in her report "could be vulnerable to impacts (as described in this report), or could require assistance in participating meaningfully in the public comment process, due to either (1) their historic connections to place and reliance on landscape for conducting essential cultural practices; (2) their isolation from resources (including linguistically appropriate information and geographically convenient meeting points/times) that would be essential to fair opportunity for participation in the public process of infrastructure siting; or (3) their pre-existing health vulnerabilities due to historic overexposure to negative environmental factors (e.g. hazardous waste sites, brownfields, high particulate matter concentrations [from agricultural sources], etc.)" (LHC Updated Community Impact Assessment, p. 2). This open acknowledgement of vulnerability to adverse impacts was not reflected in MVP's Supplemental Information on Environmental Justice; wherein they refused to even acknowledge the existence of environmental justice communities within what they determined to be the affected area, and MVP changed the radius the consultant had used in LHC's reports to determine EJ communities. LHC reports that MVP "agreed to assess impacts at this distance" to avoid missing environmental justice communities, to facilitate early engagement before the normal public participation process (LHC Updated Community Impact

Assessment, p 3). However, MVP did not appear to adhere to this agreement and presented data only on a 1 mile radius around the compressor station in their Supplemental Information on Environmental Justice Report. MVP reported they were “applying the definitions in VEJA,” though they dropped the relevant information that showed the true impact of their compressor station. Had they included this 3-mile fenceline radius, they would have encountered four communities by VEJA definitions (LHC Updated Community Impact Assessment, p. 3). Dr. Sutton Lawrence refers to the 3 mile radius as the commonly accepted ‘fenceline’ definition.

- b. On page 18 of Dr. Sutton Lawrence’s updated EJ Analysis, she finds that the 1-mile radius around the compressor station is *entirely* located within communities of color according to census tract data. On pages 10-11 of MVP’s Supplemental Information on Environmental Justice, they directly contradict this information by saying: “as explained below, the vast majority of the 1-mile study area is not a ‘community of color’ environmental justice community as defined by VEJA; the study area contains one very small part of a census block group that qualifies as a community of color under VEJA. The study area does qualify as a ‘low-income’ environmental justice community” (Supplemental Information on Environmental Justice, p. 11). Additionally, Dr. Sutton Lawrence’s updated report shows that almost every single community within a ten mile radius is a low-income community (Figure 3). Four communities (or census tracts) meet the criteria for a “food desert” within the fenceline 3-mile radius, four communities within the 5-mile radius, and seven communities within the 10-mile range (LHC Updated Community Impact Assessment, p. 31). The majority of the landscape within the fenceline 3-mile radius, 5-mile radius and 10-mile radius is rated as “poor” or “low” condition value *ahead* of the building of the proposed Lambert Compressor Station (LHC Updated Community Impact Assessment, p. 31).
- c. LHC’s report indicates efforts to engage members of “the Blairs” community, an “extensive and continuous, yet dispersed, African-American community composed of Freedman descendants, connected to a larger community centered in Blairs, Virginia...approximately 14 miles from the proposed Station site” (LHC Updated Community Impact Assessment, p. 4). However, LHC only connected with one member of this community, as compared to the first Community Impact Assessment where no members of this community engaged in dialog with LHC. Dr. Sutton Lawrence states that “ground-truthing the results of our desktop analysis is an essential part of completing a successful community impact assessment. Failing to do so could potentially result in the exclusion of local minorities/people of color from the planning process; increases in community opposition due to lack of understanding, engagement and opportunity for input;

and unjust outcomes in the distribution of benefits and risks across adjacent communities” on page 15 of LHC’s updated Community Impact Assessment. Conversing with one member of this community is not appropriate engagement of stakeholders and community members.

- d. Dr. Sutton Lawrence admits in LHC’s updated Community Impact Report that “the results of the community interviews shared here do not reflect sufficient practices to meet the standards of academic inquiry” (LHC Updated Community Impact Assessment, p, 35). In regards to LHC’s respondent data, LHC notes that “a majority of our respondents were not familiar with the proposed Station, but of those who were familiar, a majority of non-Indigenous respondents expressed comfort with the proposed location, citing its proximity to another existing Compressor Station (the Transco Station, owned by Williams) and appreciated Mountain Valley’s use of existing corridors and already impacted landscapes” (LHC Updated Community Impact Assessment, p. 40). This is problematic because LHC only spoke with one member of the African American community of Freedman descendents about the proposed Station; and the primary concerns of “almost all” of the Indigenous respondents was that “Mountain Valley be willing to divert its pipeline route in response to the discovery of sensitive artifacts or remains, as well as in response to notification from tribal leadership of sensitive cultural or historical sites...[and] acting to ensure the continued wellbeing and functioning of the ecological systems essential for economic and cultural survival in the domains of livelihoods, traditional knowledge practices around food and medicine, spirituality and ceremony, and craft” (LHC Updated Community Impact Assessment, p. 51). Therefore, the dubious implications of LHC’s quote are that the non-Indigenous, non-Black respondents are “comfortable” with the Station being placed in such a sacrifice zone: where it is away from them, where there is already existing polluting infrastructure, and where the land is already destroyed. In the first Community Impact report, LHC reported that they had not spoken to a *single* African American resident (Community Impact Assessment, p. 50). At the close of LHC’s updated report, released to the public 47 days into the DEQ public comment period, LHC noted a list of best practices in regards to outreach, ecological restoration and minimization of impact. As Virginia saw with the Buckingham Compressor Station case, Environmental Justice is not a “box to be checked,” and in order for these suggestions to have any merit, they must be *completed* and not just suggested. Thus far, it is clear these best practices are far from what has, in fact, been implemented.
- e. There are deeply problematic issues with MVP’s and LHC’s interactions, or lack thereof, with the affected communities. MVP states that they have provided “regular updates to all local residents within 0.5 miles of the Station via direct

mailings and newsletters since 2018” (Supplemental Information on Environmental Justice, p, 13). MVP states: “these newsletters (1) apprise the community of the status of the Project and next steps; (2) list where community members can access documents from FERC and otherwise; (3) include a Frequently Asked Questions section; and (4) reiterate that public input is important, with ways to communicate comments about the Project to Mountain Valley” (page 14, SIOEJ). MVP directs public input *to Mountain Valley Pipeline, LLC itself*, which is a deceptive method of containing feedback and likely misinforming anyone asking questions, expressing opposition or otherwise engaging on what should be public matters. This may have: led residents to feel they had already voiced their opinions in a public forum when they had only spoken to MVP itself, deceived the public out of independent education about the permitting processes and obscured opportunities to give legitimate public comment to DEQ and other governmental agencies. MVP reports they have regular contact with elected officials representing constituents in Pittsylvania County, many of which overwhelmingly support the project due to MVP’s misrepresented financial gain, and “local community leaders,” while providing no information as to what or to whom that statement actually refers to.

3. The majority of the comments in favor of granting an air permit to the proposed Lambert Compressor Station during the February 8th, 2021 DEQ public hearing focused on i) [economic incentives](#) related to the project (p. 40), and ii) claims that the project will use the best available technology.
 - a. The economic incentives are unrelated to DEQ’s role in issuing an air permit. Chadwick Dotson, a former judge in the 30th Judicial Circuit speaking in a personal capacity, said “I truly believe the need for economic development does far outweigh the environmental concern.” “Economic development” is not one of the criteria listed in DEQ’s defined ‘What is DEQ’s role in permitting?’ criteria on the MVP Lambert Compressor Station Draft Air Permit Fact Sheet.
 - b. In response to the claims of economic prosperity touted by proponents of the project, the Ohio River Valley Institute recently published two reports one titled ‘[Appalachia’s Natural Gas Counties, Contributing more to the U.S. economy and getting less in return](#)’ and ‘[Future Appalachian Shale Gas Drilling Unprofitable and Petrochemical Buildout Unlikely](#).’ Among the points iterated in the first report are that: “the boom/bust nature of extractive industries increases risks for other businesses that would otherwise contemplate starting up or expanding...labor’s share of the income generated by the natural gas industry is comparatively low [wages and salaries]...the sourcing of labor and materials may also be heavily exported...a failure of tax and fiscal policies to capture an adequate share of income for states and communities” (Ohio River Valley

Institute Frackalachia Report, p. 17). Though the findings refer specifically to twenty-two counties that make up the Appalachian natural gas region, including the counties that MVP originates in, the report goes on to add sobering considerations for any natural gas development: “in the absence of policies to offset or mitigate these forces, policymakers should look very critically at proposals to expand or otherwise assist the natural gas industry, which has yet to demonstrate that it is capable of contributing positively locally or on a large scale to the states and counties where it is most prevalent” (Ohio River Valley Institute Frackalachia Report, p. 18). The second report, titled ‘Risks for New Natural Gas Developments in Appalachia’ concludes the following: “the gas industry in the Appalachian region...is vulnerable to sustained, low prices of domestic gas and natural gas liquids...recent prices are not high enough to support widespread investments in gas and NGL infrastructure--including new gas fields, pipelines, and export terminals...governments around the world, including the United States, have committed to deep decarbonization under the Paris Agreement. This suggests profound changes to oil and gas markets that would render new Appalachian gas fields unprofitable, on average” (Ohio River Valley Institute, Risks for New Natural Gas Report, p. 1).

- c. Electric compressor turbines are considered the best available control technology. In MVP’s Final Draft Engineering Analysis, MVP officials exempt themselves from adherence to using the Best Available Control Technology requirements in every area of consideration under the permit, stating “The parameters in question, electric turbines with electric transmission, are believed to fundamentally redefine the BACT approach for the proposed combustion turbines and therefore BACT does not apply...A BACT requirement considers whether an emission reduction meets BACT using various factors including the cost of the control system divided by the amount of pollutant reduced; called ‘cost effectiveness,’” which should not influence DEQ’s decision to issue an air permit as DEQ is mandated by their own rules to demand the ‘Best Available Control Technology’ when issuing permits, as defined in DEQ’s “What is DEQ’s role in permitting?” section in the MVP Lambert Compressor Station Draft Air Permit [Fact Sheet](#). DEQ must explore these failures. Under any scenario other than permit denial, DEQ must hold MVP to BACT requirements. If DEQ declines to do so, the agency must clearly explain why MVP would not be required to adhere to BACT requirements, beyond ‘cost effectiveness’ and electricity requirements as reported by MVP, who of course would pursue the cheaper option.
- d. During the February 8th hearing, Brian Crockett commented on behalf of SISU Energy Environmental, stating that “the SISU system [proposed to be used in the Lambert station] is designed to achieve stringent emission reduction in line with

today's aggressive industry standards using the best proven technology to do so." Mr. Crockett's statement is misleading because electric combustion turbines, as opposed to combustion gas turbines that he is referring to, are considered to be the best available technology currently in existence to lower pollution coming from compressor stations (DEQ Feb. 8th hearing [transcript](#), p. 31).

- e. During the February 8th hearing, Doug Mace, an Engineer with Equitrans Midstream, reported that Lambert is "the most technologically advanced station in terms of environmental controls that I've worked on or have encountered. And I've been doing this for over twenty-four years." While this may be the 'cleanest' station plan that Mace has ever personally encountered, his statement is irrelevant as to DEQ's responsibility to only allow the 'Best Available Control Technology' if issuing an air permit. DEQ should disallow manipulation of its permit process by misleading statements from those who stand to profit from this polluting compressor station (DEQ Feb. 8th hearing [transcript](#), p. 47).
 - f. This significant issue is reminiscent of the air permit that DEQ issued for the Buckingham Compressor Station on the Atlantic Coast Pipeline, which was [stripped](#) by the 4th Circuit Court of Appeals in January 2020. The issue referenced above was one of the causes for stripping the Buckingham permit. Virginia Mercury reporter Sarah Vogelsong wrote, "The judges condemned the agency and the board for their failure both to consider the use of electric motors rather than gas-fired turbines at the proposed station and to evaluate the environmental justice impacts of the facility." ([source](#)) Additionally, Vogelsong reported, 'Using motors,' station opponents argued, 'would eliminate almost all' of the site's air pollution. According to the ACP's permit application, 83 percent of the expected nitrogen oxide emissions and 95 percent of its particulate matter emissions would be due to its use of gas turbines."
 - g. A [2016 report](#) by Blue Ridge Environmental Defense League (BREDL), regarding the failed Dominion Buckingham Compressor Station, outlines the clear issue of combustion turbines, which are "remarkable for their lack of efficiency in converting chemical energy to mechanical energy...from 58 to 85 percent of the fuel burned produces no power. But air pollution and global warming gases are created by combustion whether power is produced or not" (BREDL Pollution Report: Unfair, Illegal and Unjust, p. 4).
4. NC DEQ has denied the MVP Southgate extension a 401 water quality permit, as Division of Water Services Director Danny Smith [stated](#), "Due to uncertainty surrounding the completion of the MVP Mainline project," NC DEQ has concluded "work on the Southgate extension could lead to unnecessary water quality impacts and disturbance of the environment in North Carolina." This permit decision represents an opportunity for DEQ to follow North Carolina's example and serve all Virginians by protecting land,

water and communities that have long borne unfair impacts of polluting fossil fuel infrastructure: deny this irresponsible, unnecessary and dangerous permit and therefore its preventable harms.

- a. A [2021 report](#) by the Institute for Energy Economics and Financial Analysis (IEEFA) titled Mountain Valley Pipeline Faces Uphill Struggle to Financial Viability finds that MVP's future is incredibly uncertain. According to IEEFA, forecasts for natural gas demand in the region are now much lower than they were when the project was proposed. One of the shippers in NC has "likely lost its entire rationale for the project" due to NC DEQ's denial of the 401 water quality permit mentioned above (IEEFA, p. 1). Utilities that have signed up to ship gas on MVP now face significant risk that MVP will not end up providing their customers with cheaper gas. Additionally, the Appalachian Basin's pipeline capacity currently exceeds production, and prospects for greater production increasingly depend on a growing export market for Appalachian gas" that is fraught with risks (IEEFA, p. 1). Due to FERC's outdated process of evaluating need for pipelines, the "vanishing need for the Mountain Valley Pipeline highlights the urgent need for reform of FERC policy and practices" (IEEFA, p. 2). DEQ has an opportunity here to follow NC's example and stand up to FERC's poor certification process and prevent unnecessary harm to our land, water, and communities.
 - b. Additionally, the 2021 General Assembly voted to recognize racism as a public health crisis. Surely a third polluting compressor station in Freedman's founded, high elderly population, low-mobility, low-income community already dealing with two compressor stations would only contribute to the state-recognized public health crisis of racism.
5. Pollutants
- a. MVP makes a claim that "as an initial matter, the environmental justice community will bear no adverse disproportionate health risks because no community will face any appreciable health risk as a result of the facility's emissions, notwithstanding any particular sensitivities or vulnerabilities in the environmental justice community" (Supplemental Information on Environmental Justice, p. 14). MVP claims that no community will bear an adverse health risk, however in DEQ's own Lambert Permit Fact Sheet, DEQ states: "The Lambert Compressor Station will be required to obtain a 'minor new source review permit' because the facility has the potential to emit at least one regulated air pollutant above the permitting threshold. The permit requires control equipment, monitoring, testing and recordkeeping and sets limits on the amount of air pollutants that may be released over specific time frames" (DEQ Lambert Permit

Fact Sheet). By this definition, communities do have the potential to face impacts due to Lambert's emissions.

- b. The proposed Lambert Station brings many health concerns. Formaldehyde that would be emitted can lead to skin irritation, breathing problems, complicate COPD and asthma. MVP has indicated that Lambert would emit almost 9 pounds of formaldehyde an hour, in addition to the existing rate of 19 tons/year emitted by the Transco stations 165 and 166. If the Lambert Station is put into commission, the area emissions of particulate matter would increase by nearly 30%. In the Environmental Impact Statement, MVP projected that Lambert would emit more than 69 pounds of benzene each year. Acute chronic exposure to benzene (0.1 to 0.5 ppm) can reduce white blood cell counts, the most common indicator of leukemia risk.
- c. There is a significant lack of information about other Hazardous Air Pollutants (HAPs) other than formaldehyde in this draft permit. In the EIS, HAPs such as benzene, toluene and xylenes that have serious health impacts are not in this air permit.
- d. The air model employed to predict airborne pollution from Lambert may not be the most appropriate for this facility. AERMOD 19191 is approved by the EPA for industrial facilities, yet it may not adequately show variable emissions and conditions at Lambert during different operating modes, startup, shutdown, venting, blowdowns and leaks. It does not demonstrate how chemicals in the air would interact with each other, producing particulate matter from reactions among the differing gasses, nor does it adequately address pollutant deposition onto the surfaces below. DEQ has said they do not know exactly where the emissions and pollutants would end up. A different EPA approved air model, ADMS-3, would predict wet deposition, gravitational settling, dry deposition, short term fluctuations in concentrations, chemical reactions, radioactive decay and gamma dose.
- e. A [2020 study](#) by Hendryx and Luo found that “twelve individual VOCs were associated with significantly higher adjusted mortality” as well as “age adjusted mortality, controlling for covariates (race/ethnicity, poverty, urbanicity, smoking and obesity rates), was significantly higher in association with greater non-methane VOC emissions from compressor stations” (2020, Hendryx and Luo). Additionally, VOCs interact with NOx when there is sunlight and form ‘ground ozone’ (2020, Hendryx and Luo). Exposure to ground ozone can result in chest pain, coughing, throat irritation, inflammation and reduced lung function, according to the study's authors. Children and the elderly are the most vulnerable, which is of particular concern in Pittsylvania County.

- f. The draft Air Permit, Final Draft Engineering Analysis and the Green Toxicology report operate on the assumption that National Ambient Air Quality Standards (NAAQS) are *zero-risk levels*, which the EPA has indicated is *not* the case. This is especially misleading because this permit only reflects Lambert's proposed emissions, as opposed to the cumulative impact of the polluting infrastructure and compressor stations that already exist in the immediate area. Explanation of whether the cumulative impact of all of these polluting structures, and whether they violate the NAAQS, is needed before a decision can be made. *DEQ's website* states that "the facility would be classified as a minor source of air pollution pursuant to air permitting laws. If constructed, there would be no adverse impact on the air quality near the facility, and air quality would remain in compliance with all air quality standards." This is misleading because Lambert alone may not violate the NAAQS according to MVP, but Lambert would *still* emit a variety of known pollutants and carcinogens. It is misleading to the public and directly impacted communities to state that the facility would have 'no adverse impact' on the air quality.
- g. A [2021 report by Carl Zipper](#) has found that, if constructed and operated as planned, the MVP alone would be responsible for nearly 1% of the entire US energy sector's emissions in the year 2022, assuming the MVP is put into service. This percentage would rise as the US energy sector emissions decline due to the US government's commitment to the Paris Agreement and state and federal governments' responsibilities to protect their citizens and environments from further climate harms.
- h. Of further concern and need of investigation is the radioactivity, and therefore inherent risks, of the chemicals processed at the proposed compressor station. For instance, according to [Pittsburgh Mineral & Environmental Technology, Inc.'s presentation](#) by Alan McArthur and William Lemons, Radon 222 in US homes is regulated at 0.15Bq/L, where wellhead gas has been recorded at 4.44Bq/L, and transmission pipelines for natural gas have pressures 100 times the standard temperature and pressure can have Radon measurements up to 444Bq/L. These concentrations of Radon can collect on pigs, filters, inner surfaces, filters, valves, and other infrastructure components. McArthur and Lemons report that some of the problems from undetected TENORM (Technologically Enhanced Naturally Occurring Radioactive Material) including Radon and Radium are: "personnel direct and inhalation exposure to dust or aerosols containing TENORM, environmental and equipment TENORM contamination, rejection of waste by disposal facilities, rejection of scrap by recycle facilities, penalties for non-compliant transport and shipping manifest errors, unbudgeted costs for remediation of facilities, equipment, pipeline inspection pigging, filters, well

POWHR

Protect Our Water, Heritage, Rights

workover and waste disposal, and litigation costs subsequent to people exposure and environmental contamination with non-factual records” (PMET, Slide 2). Notably missing from this already dire list is the potential health consequences on the impacted communities and ecosystems from TENORM, which must be considered when permitting such a project. Other concerns include Radon Daughters Pb (lead), Bi (Bismuth) and Po 210 (Polonium 210) being deposited in pumps, pipelines, vessels, filters, storage reservoir equipment and clearly state that worker safety and waste management are concerns. According to PMET, when Polonium 210 decays to lead, it emits high energy alpha particles that can kill body cells, inhalation or ingestion of Po-210 can cause irradiation of the internal organs, and alpha particles can be stopped by skin but beta particles can penetrate up to one centimeter of body tissue (PMET Slide 21). The toxicity of Po-210 is much greater than that of cyanide, and Po-210 can “concentrate to very high concentrations in gas collecting on pipelines, all pig types and gas filters, separation and processing plants” (PMET Slide 22). Concerningly, PMET cites that “inhalation exposure in gas TENORM remediation projects has been measured at 47 times greater than the highest [maximum] external gamma exposure dose...inhalation/ingestion of Gas TENORM must be prevented...Respiratory air and public air monitoring is required on ALL Gas TENORM projects...high pressure gas pipelines can have 26,000 M Bq of concentrated TENORM” (PMET Slide 28).



Conclusion

The potential impacts of the Lambert Compressor Station are astounding, and every single one of them is unnecessary and avoidable. We recognize that permit regulations address the amount of harm that is ‘permissible,’ instead of protecting the communities and ecosystems at risk.

POWHR asks that DEQ consider the causes of environmental justice in their permitting decision, and whether saddling the Chatham community with yet another polluting compressor station adequately adheres in good faith to DEQ’s mission statement, that is “to ensure the continued vitality of these precious and valuable resources, DEQ carries out its mission to protect and improve the environment for the health, well-being and quality of life of all Virginians.” For the reasons set forth here, POWHR requests that DEQ deny the permit for the proposed Lambert Compressor Station, and in the alternative, that DEQ elevate the permit to the full Air Pollution Control Board.

Signed,

Russell Chisholm, Co-Chair
Protect Our Water Heritage Rights
2395 Clover Hollow Rd
Newport, VA 24128
540-404-2727

Roberta Motherway Bondurant, Co-Chair
Protect Our Water Heritage Rights
PO Box 96
Bent Mountain, VA 24059
540-793-4769

Archived: Friday, April 9, 2021 3:27:40 PM
From: [Jacob Hileman](#)
Sent: Thursday, April 8, 2021 6:36:22 PM
To: anita.walthall@deq.virginia.gov
Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Importance: Normal
Attachments:
[Jacob Hileman Comment in Opposition to MVP Draft Air Permit.pdf](#);

Please see the attached document for my comments in opposition to the draft air permit for Mountain Valley Pipeline's Southgate Extension project.

Best,

Jacob

Jacob Hileman Comment in Opposition to MVP Draft Air Permit.pdf

David Paylor, Director
Department of Environmental Quality
1111 E. Main St.
Richmond, VA 23219

April 8, 2021

Re: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

To the Virginia Department of Environmental Quality:

I am writing to submit comments in opposition to Mountain Valley Pipeline's (MVP) proposed Lambert Compressor Station in Pittsylvania County, Virginia. My comments, while not an exhaustive list of all the issues, provide sufficient justification for the Department of Environmental Quality (DEQ) to abandon further consideration of the draft air permit for the facility on both substantive and procedural grounds. Furthermore, while I submit these comments to DEQ at present, I would like to highlight up front how DEQ is not the appropriate venue for receiving public input in this case. It is imperative a public hearing on the draft air permit take place before the Air Pollution Control Board.

Adverse Environmental and Human Health Impacts

The draft air permit provides a dangerously incomplete accounting of the hazardous air pollutants associated with the operation of the Lambert Compressor Station. During the process of elaborating the Environmental Impact Statement (EIS) for the MVP Southgate Extension project, benzene, toluene, xylene, and other hazardous air pollutants were identified and listed in the EIS. However, formaldehyde is the only pollutant in the draft air permit with set emission limits. *If this is not an oversight, then why has DEQ chosen to exclude other hazardous air pollutants in the draft permit?*

It is also important to note that the Lambert Compressor Station is being proposed near two existing Transco compressor stations, and therefore the cumulative impacts of all facilities must be taken into account. In fact, even when accounting only for formaldehyde and no other hazardous air pollutants, it would appear the level of emissions from all three compressor stations easily exceeds the 25 tons per year limit that triggers a Clean Air Act Title V "major source pollution" permit. *On what basis has DEQ determined that a "minor new source" permit is appropriate here?*

The health concerns associated with the hazardous air pollutants that would be emitted from the Lambert Compressor Station are both acute and chronic. The average emission rates provided in the draft air permit gloss over the fact that levels of emissions will fluctuate, and that unplanned releases of large amounts of pollutants, while unpredictable, are to be expected at any industrial facility. A large release of formaldehyde could lead to skin and respiratory irritation in nearby populations, while daily exposure to even low levels of formaldehyde is associated with an increase in the rates of certain cancers. Furthermore, higher levels of ambient air pollution are positively correlated with increased mortality from the novel coronavirus, which like influenza will continue to circulate even after herd immunity is reached through vaccination.

Environmental Injustice and Disproportionate Burden of Impacts

The adverse health impacts noted above – and the list is far from complete – will disproportionately be borne by vulnerable populations in Pittsylvania County. For example, the percentage of individuals in the nearby community who are 64 years or older is well above the state and national averages. Older populations are especially susceptible to cardiorespiratory infections, including pneumonia, from high particulate matter and chemical air pollutants. Also, the high rates of serious illness, hospitalization, and death due to complications from covid-19 is markedly pronounced in older populations, even before accounting for the adverse impacts of hazardous air pollutants.

To date, DEQ has not done its due diligence in assessing the impacts of the Lambert Compressor Station on vulnerable communities in the nearby area. Specifically, the draft air permit uses census tract data, which is less accurate than more detailed, and widely available, census block data. This is particularly troubling given the very public chastising DEQ and the Air Pollution Control Board received for their failure to address environmental justice in a meaningful and substantive way in the case of a different compressor station that was sited in a community formed by Freedmen and Freedwomen in Buckingham County. In ruling against the developers of the now-cancelled Atlantic Coast Pipeline, the U.S. Court of Appeals for the Fourth Circuit determined “environmental justice is not merely a box to be checked...failure to consider the disproportionate impact on those closest to the Compressor Station resulted in a flawed analysis.” *Why is DEQ relying on the same flawed approach for assessing environmental justice that courts previously struck down?*

Uncertainty of Project Viability

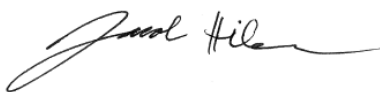
The North Carolina Department of Environmental Quality (NCDEQ) previously rejected MVP’s request for 401 Water Quality Certification for the Southgate project. While the U.S. Court of Appeals for the Fourth Circuit overturned NCDEQ’s original denial of the 401 permit on March 11, 2021 – on the grounds that NCDEQ “did not adequately explain its decision in light of the administrative record” – the court also affirmed that NCDEQ’s “denial is consistent with the state’s regulations and the Clean Water Act”. NCDEQ has since indicated it will move to reject MVP’s request yet again, and provide a thorough justification for the denial in accordance with the court ruling. Perhaps the best evidence available to NCDEQ to justify withholding the 401 permit is the fact that MVP has already received fines in excess of \$2.7 million for violating water quality laws and related environmental statutes in Virginia and West Virginia. In order for NCDEQ to grant 401 Water Quality Certification to MVP, the state must have “reasonable assurance” that the Southgate project will not degrade water quality. MVP’s own record demonstrates the company is unable and unwilling to meet this standard of “reasonable assurance.” *Why would Virginia’s DEQ even consider reviewing an air permit application, let alone issuing the permit, for a contentious project that may be imminently cancelled?*

Timing of Regulatory Processes and Unnecessary Controversy

On March 25, 2021, DEQ stated in a letter to the U.S. Army Corps of Engineers that it is likely the state will not be able to issue waterbody crossing permits to MVP for the mainline project “until early 2022.” For the reasons outlined by the U.S. Court of Appeals for the Fourth Circuit above, Virginia has the authority to deny granting these permits to MVP. It should exercise that authority based on MVP’s history of non-compliance. The timing of DEQ’s consideration of the Lambert Compressor Station is therefore quite vexing, as it unnecessarily thrusts DEQ into the middle of yet another major controversy. *On what grounds does DEQ find it pertinent to consider the air permit for the Lambert Compressor Station, when the futures of both the MVP mainline and Southgate Extension projects are in jeopardy, and when doing so diminishes DEQ’s credibility while providing no tangible benefits?*

Until the MVP mainline and Southgate Extension projects receive all necessary state and federal permits, DEQ cannot justify moving forward with the air permit for the Lambert Compressor Station.

Respectfully submitted,



Jacob Hileman, Ph.D.
5555 Mt. Tabor Rd.
Catawba, VA 24070
540-320-7711

Archived: Friday, April 9, 2021 3:27:40 PM

From: emily@everyactioncustom.com

Sent: Thursday, April 8, 2021 9:24:45 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. Emily Sutton

2700 Old Hope Valley Farm Rd Chapel Hill, NC 27517-8947

emily@hawriver.org

Archived: Friday, April 9, 2021 3:27:40 PM

From: [MARTHA W GIROLAMI](#)

Sent: Thursday, April 8, 2021 9:38:16 PM

To: anita.walthall@deq.virginia.gov

Cc: elle@chesapeakeclimate.org

Subject: Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Importance: Normal

Attachments: [MVP Lambert CS comments 4-21.pdf](#) ;

MVP Lambert CS comments 4-21.pdf

Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit
Comments
Martha Girolami
473 Mount Pisgah Church Road
Apex, NC 27523
Chatham County, NC
919-621-1087

I oppose the construction of the Mountain Valley Pipeline (MVP) Lambert Compressor station. I live in North Carolina where the proposed MVP Southgate pipeline is routed from the proposed Lambert Compressor Station in Virginia into Alamance County, North Carolina (NC). This pipeline runs next to NC's Haw River which major watercourse is a vital drinking water and recreational resource in Chatham County where I live. Citizens of NC must be heard since they will be forced to incur environmental damage from the Southgate pipeline from the Lambert compressor station. Also MVP has a long record as reckless and incompetent in its construction projects in Virginia often damaging the environment as shown by the its record number of NOV's, stop work orders, lawsuits, and citizen complaints and protests.

For the following reasons, I request the Lambert compressor station air permit be given a public hearing before the full Air Pollution Control Board.

The Lambert Compressor Station is a complex project with controversial and unresolved project issues which are as follows:

- (1) building another gas pipeline and compressor station is not a rational response to the global, inconvenient and horrific climate emergency,
- (2) nearby residents and gas infrastructure are unsafe due to overlap of blast zones and possible problems with evacuations in case of explosions due to the proximity of three compressor stations and their pipelines,
- (3) environmental justice issues are have not been resolved,
- (4) MVP fails in its permit to model and address the amount of Hazardous Air Pollutants (HAPS) emissions and also radioactive elements.
- (5) MVP fails to address cumulative pollutant impacts both future and historical from adjacent Transco natural gas infrastructure.

Additionally, why is the Lambert compressor station being permitted at this time? MVP Southgate's 401 water permit was denied by NC Department of Environmental Quality. Also the MVP mainline may never be completed. MVP mainline has enormous problems—doubling costs, permit issues, lawsuits, failure to meet Paris climate accord goals, and widespread public resistance. The Lambert Compressor Station could easily become a stranded asset if permitted and built now. There is substantial doubt the MVP Mainline will be completed and that MVP Southgate 401 permit will ever gain approval.

1. CLIMATE EMERGENCY

When will Virginia explore and develop other options besides natural gas? It is late in the history of our earth to slow or stop the damage from our high carbon emissions. Humans cannot wait for 5 or 10 years to gradually decrease fossil fuel usage. Right now pollution must fall by 50% in the next few years...think 2025! Societal and ecological collapse is the price life on earth will pay if we return to business as usual post pandemic. In this future, new gas pipelines and compressor stations have no validity.

Additionally, any current need for natural gas in North Carolina is met by Transco. The MVP, the Lambert Compressor Station and the MVP Southgate are unnecessary.

2. SAFETY

A 24 inch natural gas pipeline operating at an intermediate pressure of 1000 psi has a recommended blast radius of 660 feet.

(Source: A MODEL FOR SIZING HIGH CONSEQUENCE AREAS ASSOCIATED WITH NATURAL GAS PIPELINES Mark J. Stephens, C-FER Technologies, Edmonton, Alberta T6N 1H)

However, a Google search finds that many pipeline explosions have incinerated double this radius. Also according to the US Department of Housing and Urban Development, a recommended evacuation zone to avoid burn injury for this size pipeline is 1730 feet.

My concern is the proximity of Transco pipelines and compressor stations in this one area where the Lambert compressor station is to be sited. Are inhabitants and other gas infrastructure endangered when any one of these gas projects explodes both due to proximity and problems with quick evacuation?

3. ENVIRONMENTAL JUSTICE (EJ)

The EJ screen process was considered to be inadequate for Union Hill ACP compressor station as it is for this Lambert Compressor station.

Lack of broadband meant that many households could not participate and were not well informed in a timely fashion about hearings and comments, etc.

The representative from the local Pittsylvania county NAACP asserted that her organization only heard about the pipeline in early 2021 and had not had sufficient time to raise awareness and organize meetings. Why was the local NAACP overlooked by MVP when the Board of Supervisors were very friendly with MVP contacts as was noticed by their comments at the public hearing.

Information about EJ communities within 3-5 miles radius of the Lambert site was omitted in MVP's permit application in September 2020. This and other discrepancies between the MVP consultant in her EJ Analysis Report and MVP statements are troubling.

4. HAPS

Benzene, xylene, and toluene are not subject to emission testing in the draft air permit along with formaldehyde. These new HAPs must be similarly regulated. Formaldehyde emissions must be reduced given the two Transco compressor stations emission sources nearby. There is real health danger from this cumulative release of this pollutant.

Radioactive elements are neglected and must be subject to emissions testing.

5. CUMULATIVE IMPACTS

There is no consideration of background pollution from the two Transco compressor stations and their pipelines. The combined emissions from three compressor stations and their pipelines and associated gas infrastructure possibly justify a Clean Air Act Title V air permit for carbon monoxide, nitrogen oxides, volatile organic compounds and potentially HAP's. Current environmental conditions and public health status at the site for the Lambert Compressor Station have not been assessed and must be investigated.

Danville-Pittsylvania Regional Industrial Facility Authority



427 Patton Street, Room 428
Danville, Virginia 24541
(434) 797-8928
email: sdemasi@danvilleva.gov



Sherman M. Saunders, Chairman

Ronald S. Searce, Vice Chairman

March 10, 2021

Anita Walthall
Blue Ridge Regional Office
Virginia Department of Environmental Quality
901 Russell Drive
Salem, VA 24153



Dear Ms. Walthall,

The Board of the Danville Pittsylvania Regional Industrial Authority voted to confirm their support of the Mountain Valley Pipeline Southgate Project and offer the following on behalf of the Danville-Pittsylvania Regional Industrial Facilities Authority (DPRIFA) requesting that DEQ and the Air Pollution Control Board (Air Board) approve the air permit for the Lambert Compressor Station. The RIFA Board believes the MVP Southgate project will bring material benefits to our region including enhancement of our ability to attract good paying jobs. It is our understanding that Mountain Valley has designed its proposed Lambert Compressor Station with numerous controls that ensure it has no adverse impact on air quality. RIFA believes the Air Board should approve the project.

It is critically important for our region that we have reliable access to affordable natural gas. Economic development and public safety require reliable and predictable energy sources so that businesses can run smoothly, and residents can heat their homes affordably. It is important to our business and citizens to have reliable, competitively priced and diverse sources of energy.

The Board requests approval of MVP Southgate's application so that our community can realize the economic development and quality of life benefits of this important project.

Thank you for your consideration.

Sincerely,

Sherman Saunders
Chairman

Archived: Tuesday, March 16, 2021 7:52:34 AM

From: russell.powhr@everyactioncustom.com

Sent: Monday, March 15, 2021 5:38:01 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

The current permitting process did not: (1) consider toxic cumulative direct and indirect impacts, (2) conduct a robust and inclusive community engagement program, or (3) perform an accurate air quality modeling analysis. Furthermore, the Air Quality Control Board should also request that the applicant provide information about any alternate sites that were considered and why they were removed from further evaluation.

A 27,756-horsepower compressor station, Lambert Compressor Station, is being proposed in Pittsylvania, VA. This compressor station will be located adjacent to two existing compressor stations and would increase air pollutant and particulate matter levels such as nitrogen oxides, formaldehyde, and carbon monoxide (to name a few), into the air. The new compressor station would add to the cumulative harm done to people in the minority-majority Banister voting district and the Chatham-Blairs Voting District, who have been burdened by pollution from two other Transco compressor facilities for sixty years.

Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mr. Russell Chisholm

2395 Clover Hollow Rd Newport, VA 24128-3530

russell.powhr@gmail.com

Archived: Wednesday, March 17, 2021 7:56:22 AM

From: ijmans55@everyactioncustom.com

Sent: Tuesday, March 16, 2021 3:26:13 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Ingrid Mans

612 Montgomery St Blacksburg, VA 24060-7221

ijmans55@gmail.com

Archived: Wednesday, March 17, 2021 7:56:22 AM

From: activismvirginia@everyactioncustom.com

Sent: Tuesday, March 16, 2021 12:34:26 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Ms. Kay Ferguson

1050 Broomley Rd Charlottesville, VA 22901-7824

activismvirginia@gmail.com

Archived: Wednesday, March 17, 2021 7:56:23 AM

From: rwmcnutt@everyactioncustom.com

Sent: Tuesday, March 16, 2021 12:31:10 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Sincerely,

Mr. ROBERT MCNUTT

253 Samuel Harris Ln Chatham, VA 24531

rwmcnutt@mindspring.com

Archived: Wednesday, March 17, 2021 7:56:23 AM

From: chansle2@everyactioncustom.com

Sent: Tuesday, March 16, 2021 11:46:03 AM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Virginian residents deserve to know that the air they breathe in is safe and clean. Take action and support the Pittsylvania County NAACP! Thank you for considering my views.

Sincerely,

Mrs. caroline hansley

116 Jones Ave Hillsborough, NC 27278-2211

chansle2@ncsu.edu

Archived: Thursday, March 18, 2021 9:33:44 AM

From: valake07@everyactioncustom.com

Sent: Wednesday, March 17, 2021 6:22:46 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Sincerely,

Mrs. Susan Smith

373 Constitution Blvd Wirtz, VA 24184-4519

valake07@centurylink.net

Archived: Thursday, March 18, 2021 9:33:45 AM

From: lilpopanda@everyactioncustom.com

Sent: Wednesday, March 17, 2021 11:24:11 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

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Sincerely,

Ms. Elisabeth Chan

2932 S Columbus St Apt C1 Arlington, VA 22206-1441

lilpopanda@yahoo.com

Archived: Friday, March 19, 2021 8:30:45 AM

From: lynnanitagodfrey@everyactioncustom.com

Sent: Thursday, March 18, 2021 10:39:19 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

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Sincerely,

Ms. Lynn Godfrey

1708 Hoover Ave Apt D Chesapeake, VA 23324-3277

lynnanitagodfrey@gmail.com

Archived: Friday, March 19, 2021 8:30:45 AM

From: glenbesa@everyactioncustom.com

Sent: Thursday, March 18, 2021 7:31:31 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

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Sincerely,

Mr. Glen Besa

4896 Burnham Rd North Chesterfield, VA 23234-3712

glenbesa@gmail.com

Archived: Friday, March 19, 2021 8:30:45 AM

From: wildink@everyactioncustom.com

Sent: Thursday, March 18, 2021 5:59:48 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Sincerely,

Ms. Amelia Williams

128 Wildwood Trl Afton, VA 22920-2945

wildink@protonmail.com

Archived: Friday, March 19, 2021 8:30:46 AM

From: mjdishere00@everyactioncustom.com

Sent: Thursday, March 18, 2021 1:55:59 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Sincerely,

Mx. Michael James-Deramo

1455 Mount Tabor Rd Blacksburg, VA 24060-8601

mjdishere00@gmail.com

Archived: Friday, March 19, 2021 8:30:46 AM

From: emily.satterwhite@everyactioncustom.com

Sent: Thursday, March 18, 2021 12:02:50 PM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

Dear Anita Walthall,

I am writing to urge you to fully support the request of the Pittsylvania County NAACP branch for the Mountain Valley Pipeline Minor New Source Review Permit be denied and referred to the Air Pollution Control Board.

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Sincerely,

Dr. Emily Satterwhite

506 Southgate Dr Blacksburg, VA 24060-5437

emily.satterwhite@gmail.com

Archived: Monday, March 22, 2021 8:28:27 AM

From: annabhebner@everyactioncustom.com

Sent: Friday, March 19, 2021 7:18:14 AM

To: anita.walthall@deq.virginia.gov

Subject: Support the Pittsylvania County NAACP and Their Fight for Clean Air

Importance: Normal

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Sincerely,

Ms. Anna Hebner

2314 Williams St Henrico, VA 23228-5109

annabhebner@yahoo.com