



SIERRA CLUB

Connecticut Chapter
P.O. Box 270595
West Hartford, Connecticut 06127
connecticut.sierraclub.org

via email: DEPEnergy@dec.ny.gov and cc: karen.gaidasz@dec.ny.gov

February 22, 2023

Dear Ms. Gaidasz and colleagues at the New York State Department of Environmental Conservation,

On behalf of the Sierra Club Connecticut Chapter and our more than 40,000 members and supporters in Connecticut, thank you for the opportunity to provide comment on the “Iroquois” Enhancement by Compression (ExC) Project, DEC Application IDs 3-1326-00211/00001 (Dover Compressor Station) and 4-1922-00049/00004 (Athens Compressor Station).

Sierra Club Connecticut urges you to deny the Article 19 State Air Facility Permit for the “Iroquois” Enhancement by Compression Project. This project is bad for the climate, public health, and local communities. In addition to the New York compressor stations in Athens and Dover, the proposed project will expand compressor stations in Brookfield and Milford, Connecticut. The Dover compressor station is 3.6 miles from the border of Connecticut. So could say something about how the added emissions from that facility will also directly impact Connecticut residents. Expansion of compressor stations will have far reaching climate and public health impacts that include increased greenhouse gas emissions, regional air pollution impacts, and safety concerns for communities where the compressor stations are located.

We urge you to consider the following:

Climate Change: In its 2021 Global Methane Assessment, the UN reports “Reducing human-caused methane emissions is one of the most cost-effective strategies to rapidly reduce the rate of warming and contribute significantly to global efforts to limit temperature rise to 1.5°C.” Fossil gas is primarily made of methane, a powerful greenhouse gas 80 times more powerful than carbon dioxide over a 20-year period. Reducing the emission of methane now will have an immediate impact because it is a short term greenhouse gas. The greenhouse gas emissions that the new turbines and generators will release must be fully calculated including upstream and downstream emissions.

Expansion contradicts New York and Connecticut energy goals, which require reduction in greenhouse gas emissions.

Toxic Emissions: Compressor stations generate toxic substances, which harm surrounding communities when released. These chemicals include volatile organic compounds (VOCs), such as toluene, benzene, formaldehyde, and methylene chloride; particulate matter, such as dust, dirt, soot, or smoke; nitrogen oxides; radioactive material; ozone; and other hazardous air pollutants. Many of these toxins, such as benzene, have been labeled as known or probable carcinogens by the Environmental Protection Agency (EPA) and the World Health Organization (WHO).

Phone: (860) 578-4750 -- Email: Connecticut.chapter@sierraclub.org

Connecticut Chapter
P.O. Box 270595
West Hartford, Connecticut 06127
connecticut.sierraclub.org

Public Health: Health consequences range from eye, throat, and skin irritation to long-term diseases and damage to various organs and body systems. Common chronic health impacts experienced by individuals living or working near compressor stations include damage to the liver and kidneys, nervous system, and cardiovascular system; developmental issues and reproductive damage; and leukemia.

Safety: Compressor stations and pipelines are susceptible to major accidents, as there have been numerous reported explosions in the country. In North Weymouth, MA, residents have been fighting the development of a new compressor station -- owned by energy giant Enbridge -- from construction to operation. This past May, the station shut down for the fourth time due to an "outage." In September, 2020, the site shut down twice, venting a combined 364,000 standard cubic feet of gas, and another 11,430 cubic feet months later. Such high volumes of fumes create a dangerous fire hazard and are a clear threat to public health and safety.

There is no real need for this project. BHETC claims this project will respond to the growing market for customers ConEd and National Grid. However, New York's climate law requires more clean energy and less greenhouse gas emissions, which will lead to a shrinking market for methane gas. BHETC also claims its energy source offers a cleaner option as New York City phases out fuel oils, however, as proven above, gas is not a clean alternative.

For these reasons, Sierra Club Connecticut urges you to deny these permits. Thank you for your attention to this important issue and consideration of our testimony.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut