

People's Hearing on FERC
December 2, 2016
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FERC: docket # CP15-554-001
Intervenor, Atlantic Coast Pipeline

FERC APPENDIX B Human Health Risk Assessment and Response to Comments:
<https://www.dom.com/library/domcom/pdfs/gas-transmission/atlantic-coast-pipeline/acp-buckingham-new-market-ea-hhra-appendix-b.pdf?la=en>

Today, I present evidence of grave scientific concerns about FERC's Human Health Risk Assessment – written to respond to critical health impact comments about a single engine Dominion Power compressor station. Then renamed to address comments for the only proposed Atlantic Coast Pipeline/ACP compressor station in Virginia, 55,000 hp in size in Buckingham County. FERC's conclusions about the benign impacts of 24/7 365 exposure to the methane, benzene, Co2, formaldehyde, VOCs, particulate matter, etc emitted from 1 single turbine are only made more concerning when that purported data is applied to the one planned for Buckingham at 8x larger.

Dominion Power is applying for a special use permit exemption to build a 68-acre, 14 gas turbine compressor station in an A1 Agricultural District in Buckingham. They brought forward FERC's Health Risk Assessment at the Buckingham Planning Commission to counter expert testimony by Barb Gottlieb, Director of Environment and Health, National Physicians for Social Responsibility. She presented the latest scientific evidence about the negative health impacts from even small compressor stations such as cited by FERC's study.

Public comments referred to blow-downs, leaks, fires, and their health impacts on nearby residents with pre-existing conditions, young children, pregnant women, and the large percentage of nearby residents who are elderly. Public health concerns relate to health disparities and environmental injustice – siting a mega-compressor station in the middle of a densely populated, 92% African American historic Freedmen community of Union Hill.

Dominion's representatives dismissed all health concerns using the FERC study, which looks like science, but in no part is scientific. The authors are unnamed FERC staff (P.1). Their credentials as scientists cannot be verified, so they cannot be held accountable in peer review. They cannot be independent scientists as FERC staff are paid by the corporations they regulate. As all data in this report are from Dominion-taken air samples, this qualifies as industry-sponsored data, and industry sponsored research is a key concern in medical science.

FERC's "evidence" is air emissions samples taken by Dominion at 3 very small compressor stations with a single small hp engine. The most recent samples are from 2012. All toxic emissions, particulate matter and radioactive compounds measured were for compressor stations that **at their largest were 46,803 hp smaller** than the one proposed for Buckingham.

So no authorship, no non-interested data, no comparable data. Lastly, the model used, "risk assessment" is deeply flawed, critiqued by public health scientists because it uses no actual data from people. "Risk assessment" data flattens the direct line between toxic chemicals that specific individuals encounter in specific environments and their cancers and early mortality rates by

using data mining – deaths in a zip code for instance. Often used as a no-liability tool. Notably, post-911 by NYC to erase connections between emergency workers and subsequent cancers and early deaths. We call for FERC to require “weight of evidence” studies on compressor stations, such as the Minisink NY compressor station monitoring study, just 1/5 the size of the Buckingham application. It found links between routine operations as well as blowdowns and new reports of health conditions at doctor visits. We ask FERC to support independent, peer-reviewed science not industry-sponsored pseudo-science.