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September 30, 2020

Martin Suuberg
Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Dear Commissioner Suuberg,

I write to urge the Massachusetts Department of Environmental Protection (MassDEP) to conduct an updated and comprehensive review of the public health, environmental, and safety impacts of the natural gas compressor station under construction in Weymouth, Massachusetts. Any updated review that takes into consideration (1) new health risk data, (2) the ongoing and accelerating climate crisis, and (3) a recent equipment failure that caused a major gas release and emergency shutdown, can reach only one conclusion: All construction on the project must stop and the compressor station must not be allowed to operate. In addition to this new review, MassDEP should also transparently reassess the Best Available Control Technology (BACT) analysis, with opportunity for stakeholder review, before it considers allowing compressor operations to begin.

First, MassDEP must consider new data about the health risks that the Weymouth compressor station poses. Although the Metropolitan Area Planning Council (MAPC) prepared a Health Impact Assessment (HIA) of the compressor station, the assessment did not capture its full health impacts.¹ An independent review of the HIA found that it was too limited in scope; failed to fully assess cumulative pollutant exposures; neglected to adequately consult Environmental Justice communities; and underestimated potential health effects of emissions below regulatory thresholds.² I encourage MassDEP to work with its partner agencies and independent third-party firms, as necessary, to initiate a further health impact review — one that both addresses issues

¹ Commonwealth of Massachusetts Department of Public Health, MassDEP, and MAPC, *Health Impact Assessment of a Proposed Natural Gas Compressor Station in Weymouth, MA* (Jan. 2019), www.mass.gov/doc/health-impact-assessment-weymouth-proposed-natural-gas-compressor-station-final-report/download.

² <http://foreriverhia.com/wp-content/uploads/2020/09/Final-Fore-River-HIA-Evaluation-Statement-091420.pdf>.

raised by the independent review and takes into account new research connecting COVID-19 mortality to air pollution exposure.³

Second, MassDEP must give more consideration to the impact of climate change. The state Office of Coastal Zone Management (CZM) conducted a federal consistency review of the project, publishing a single-page certification of the project on November 12, 2019.⁴ But this review does not adequately take into account the accelerating threats of the climate crisis, highlighted in dramatic effect by the recent wildfires engulfing the West Coast of North America. I urge MassDEP to conduct a full climate resiliency assessment of this project.

Third, MassDEP must consider the compressor station's existing safety record. On September 24, 2020, the Federal Energy Regulatory Commission (FERC) approved the request of Enbridge's subsidiary, Algonquin Gas Transmission, LLC, to place the Weymouth compressor station into service so that it can commence operations by October 1, 2020.⁵ This request came less than a week after a gasket failure at the compressor station caused an unplanned release of approximately 169,000 standard cubic feet of natural gas at ground level.⁶ This accidental gas leak led on-site employees to trigger the emergency shutdown system. This incident underscored the need to better understand the dangers that the Weymouth compressor station poses to public health and safety. MassDEP, in conjunction with the Massachusetts Emergency Management Agency (MEMA), should review this incident, and consider it as part of a robust analysis of the facility's public safety risks.

Finally, putting the Weymouth compressor station into immediate operation would be premature, as MassDEP has yet to complete its court-ordered reassessment of the BACT analysis.⁷ Should MassDEP determine that the electric motor turbine is the best available technology to control dangerous emissions, rather than the originally approved natural gas-fired turbine, Enbridge would need to overhaul its project. Regardless of the updated BACT analysis findings, MassDEP should ensure that stakeholders have adequate time to review and respond to it before the compressor may begin operations. Given that the U.S. Court of Appeals for the First Circuit determined that MassDEP failed to adhere to its own procedures in its previous iteration of the BACT analysis, MassDEP should conduct a thorough review of the new analysis to ensure that it meets established standards, including that air contaminant emissions adhere to National Ambient Air Quality Standards.⁸

³ Xiao Wu, Rachel C. Nethery, *et al.*, *Exposure to air pollution and COVID-19 mortality in the United States*, medRxiv (Apr. 5, 2020), <https://doi.org/10.1101/2020.04.05.20054502>.

⁴ Lisa Berry Engler, *Letter RE: CZM Federal Consistency Review of Atlantic Bridge Project-Weymouth Compressor Station, Weymouth*, Massachusetts Office of Coastal Zone Management (Nov. 12, 2019), <https://d279m997dpfwgl.cloudfront.net/wp/2019/11/Weymouth-Compressor-Station-Concurrence-11-12-19-signed.pdf>.

⁵ Rich McGuire, *Letter to Chris Harvey Re: In-Service Authorization*, Federal Energy Regulatory Commission (Sept. 24, 2020), https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20200924-3034.

⁶ Letter from William T. Yardley, Exec V.P., Enbridge, Inc., to Senators Edward J. Markey and Elizabeth Warren (Sept. 23, 2020).


⁷ Barbara Moran, *Court Vacates Weymouth Compressor Air Permit*, WBUR (June 3, 2020), <https://www.wbur.org/earthwhile/2020/06/03/court-vacates-weymouth-compressor-air-permit>.

⁸ Barbara Moran, *With Air Permit Vacated, Senators Call For Construction To Stop On Weymouth Compressor*, WBUR (June 19, 2020), <https://www.wbur.org/earthwhile/2020/06/19/air-permit-vacated-weymouth-compressor>.

New and urgent information is emerging regularly about the dangers the Weymouth compressor station poses to the residents of the Fore River Basin, the environmental hazards that are already polluting the surrounding neighborhoods, and the lingering questions about the initial assessments conducted by the state. It has become increasingly clear that MassDEP must revisit and revise its past analyses of the project. A full, current, and comprehensive review would show that Weymouth, Massachusetts is the wrong place for a natural gas compressor station and that this project is not only unnecessary, but dangerous.

I thank you for your attention to this important issue and encourage you to contact Senator Markey's office at 202-224-2742 with any questions or concerns you may have.

Sincerely,

A handwritten signature in blue ink that reads "Edward J. Markey". The signature is fluid and cursive, with a horizontal line drawn underneath the name.

Edward J. Markey
United States Senator