



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

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Via Electronic eFiling via <http://www.ferc.gov/docs-filing/efiling.asp>

Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Dear Kimberly D. Bose:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Federal Energy Regulatory Commission (FERC) *Draft Environmental Assessment for the Broad Run Expansion Project (Draft EA)* proposed by Tennessee Gas Pipeline Company, LLC. On January 30, 2015, Tennessee Gas Pipeline Company filed an application with FERC for a Certificate of Public Convenience and Necessity (Certificate) authorizing construction, modification, and operation of natural gas pipeline facilities in West Virginia, Kentucky, and Tennessee, and is requesting approval to abandon compressor equipment.¹

Tennessee Gas Pipeline Company requests authorization to construct, modify, and operate natural gas pipeline facilities in West Virginia, Kentucky, and Tennessee to provide up to 200,000 dekatherms per day (Dth/d) of firm incremental transportation services to Antero Resources Corporation and to replace older, less efficient compression facilities with new, more efficient compression facilities at two compressor stations. To accommodate the increase in gas transportation requirements, Tennessee Gas Pipeline Company proposes to modify two existing compressor stations and construct four new compressor stations.

More specifically, the Draft EA considers constructing one new bidirectional natural gas-fired compressor station in Davidson County, Tennessee.² As the environmental and natural resources regulatory authority in Tennessee, TDEC's comments will focus on proposed actions and associated impacts that will occur in Tennessee.

TDEC's **Tennessee Geological Survey (TGS)** and **Tennessee State Parks and Real Property Management** have reviewed the Draft EA and have no specific comments regarding the proposed actions.

¹ Under section 7(c) of the NGA, FERC determines whether interstate natural gas transportation facilities are in the public convenience and necessity and, if so, grants a Certificate to construct and operate them. FERC bases its decisions on technical competence, financing rates, market demand, gas supply, environmental impact, long term feasibility, and other issues concerning a proposed project. Section 7(b) of the NGA specifies that no natural gas company shall abandon any portion of its facilities subject to the Commission's jurisdiction without the Commission first finding that the abandonment will not negatively affect the present or future public convenience and necessity.

² The Draft EA also discusses the following actions proposed within other states: modifying existing Compressor Stations in Powell County and Boyd County, Kentucky; constructing two new compressor stations in Kanawha County, West Virginia; and constructing one new compressor station (875) in Madison County, Kentucky.

TDEC's **Division of Air Pollution Control (APC)** has reviewed the Draft EA and has the following comments on the proposed actions:

- Under Section 2.8.3 “Existing Ambient Air Quality and Attainment Status,” APC comments that air quality data values presented in Tables 2-23 and 2-24 appear to be incorrect. More specifically, for the PM_{2.5} pollutant parameter listed in Table 2-23 and 2-24, a 1-Hour standard is listed, but APC comments that there is only a 24 Hour standard and an Annual standard. APC recommends that these tables be corrected and that the Monitored Design Values be updated to reflect a 24 Hour standard and an Annual standard in the Final EA.
- APC recommends that FERC present details regarding the applicability of and compliance with the General Duty Clause under Section 112(r) of the Clean Air Act Amendments in the Final EA.³
- APC comments that Table 2-22 in Section 2.8.1 “Existing Air Quality” references out of date Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS) and recommends that FERC reference the current EPA NAAQS in the Final EA.⁴
- APC recommends that FERC take all actions necessary to mitigate any fugitive emissions resulting from onsite construction activity. APC comments that the proposed project does not directly include references to any demolition of buildings on site. If any structures are demolished, APC comments that an asbestos demolition notification provided in advance and proper pre demolition surveys to identify the presence of any regulated asbestos containing materials would be required.
- If any open burning activity of tree or limb debris is being considered as part of land clearing operations, APC recommends that FERC include in the Final EA that such activities will be conducted in a manner to encourage responsible smoke dispersion and in accordance with the state open burning regulatory requirements.⁵
- APC recommends that the Final EA include a table that identifies the anticipated emissions impacts for NAAQS (in tons per year (TPY)) once operation has commenced in comparison with current NAAQS. APC recommends that this table also present the TPY of actual and allowable emissions and the thresholds for Title V and Prevention of Signification Deterioration (PSD) permitting.

TDEC's **Division of Natural Areas (DNA)** has reviewed the Draft EA and, based on the analysis of the Draft EA and concurrence from the Tennessee Wildlife Resources Agency (TWRA), does not anticipate adverse impacts to state listed rare, threatened or endangered plant species.

TDEC'S **Division of Water Resources (DWR)** has reviewed the Draft EA and has the following comments on the proposed actions:

- Under Section 2.2.2 “Surface Water,” DWR comments that TDEC classifies all surface waters under Chapter 1200-4-4 of the TDEC DWR Rule, Use Classification for Surface Waters.⁶ The proposed compressor station in Tennessee, Compressor Station 563, is in the Sycamore Creek watershed, which is

³ The General Duty Clause states that owners and operators of stationary sources producing, processing, handling or storing regulated substances or other extremely hazardous substances have a general duty to identify hazards which may result from releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.

⁴ The current EPA NAAQS table is available at <https://www.epa.gov/criteria-air-pollutants/naaqs-table>.

⁵ TDEC APC Rule 1200-3-4-.01 *et seq.*, <http://share.tn.gov/sos/rules/1200/1200-03/1200-03-04.pdf>. Additional information on open burning in Tennessee is available at <https://tn.gov/environment/article/apc-open-burning> and <http://www.burnsafetn.org/>.

⁶ Chapter 1200-4-4 of the TDEC DWR Rule, Use Classification for Surface Waters, <https://www.epa.gov/sites/production/files/2014-12/documents/tn-chapter1200-4-4.pdf>.

designated by the TDEC for domestic, fish and aquatic life, recreation, livestock water and wildlife, and irrigation uses. DWR recommends that this classification of surface waters be addressed in the Final EA.

- DWR notes that the proposed actions may result in a minor increase in storm water contribution due to the presence of impervious surfaces. DWR recommends FERC include in the Final EA that storm water best management practices will be applied to the site during construction and in post construction storm water management.

TDEC's **Office of Energy Programs (OEP)** has reviewed the Draft EA and has the following comments on the proposed actions:

- Under Section 1.5.2 "New Compressor Stations," OEP supports bidirectional natural gas pipelines, which provide and maintain our state's access to energy resources. In the event of an energy emergency related to natural gas, the bidirectional pipeline would allow for redirection of natural gas supplies from the impacted area and provide greater energy assurance for the state.
- Under Section 2.1.1 "Geology," OEP comments that Compressor Station 563 is noted as being within a historically seismic active area. OEP supports building design and construction that meets the current International Building Code guidelines for facilities in seismic zones, which would minimize life-threatening structural damage during an earthquake.
- Under Section 2.6.1 "Population, Economy, and Employment," OEP notes that the Draft EA states "Davidson County, Kentucky" and recommends that it be corrected to state "Davidson County, Tennessee" in the Final EA.
- Under Section 2.9 "Noise," OEP recommends FERC consider using electric-powered lawn equipment, which are as much as fifty percent (50%) quieter than traditional gas-operated models and reduce petroleum-fuel purchases and used oil waste.⁷

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



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Director of Policy and Planning
Phone: (615)-532-8689

cc: Ron Zurawski, TDEC, TGS
Bill Avant, TDEC, TSP
Lacey Hardin, TDEC, APC
Stephanie A. Williams, TDEC, DNA
James Sutherland, TDEC, DWR
Molly Cripps, TDEC, OEP

⁷ With the proposed site adjacent to Paradise Ridge Community Park, electric lawn equipment would decrease the noise impact to citizens at the Park.