

**Written Comments due by 11:59p.m. on March 10, 2021**

**Instructions:**

**Send your email to:** [anita.walthall@deq.virginia.gov](mailto:anita.walthall@deq.virginia.gov)

**Include in the Subject:** Mountain Valley Pipeline Lambert Compressor Station Draft Air Permit

Include your name, mailing address and telephone number with your comment.

APPLICANT NAME AND REGISTRATION NUMBER: Mountain Valley Pipeline, LLC; 21652

FACILITY NAME AND ADDRESS: Lambert Compressor Station; 987 Transco Road in Chatham, Virginia 24531

VCCA requests that the Air Pollution Control Board review the permit. The permit will contribute additional air pollution in a location that is already burdened with gas infrastructure and where environmental justice populations have been identified.

Representing over 450 0 doctors, nurses and allied health professionals in Virginia, Virginia Clinicians for Climate Action (VCCA) is dedicated to protecting the health of our patients and communities through education, community outreach and advocacy around climate solutions. VCCA is concerned about the health of people around the proposed Lambert compressor station (CS) as well as the implications for climate if the Mountain Valley Pipeline (MVP) and Southgate extension are put into service.

It has been estimated by [Oil Change International](#) that the MVP will contribute 89 million metric tons of CO<sub>2</sub>e annually. That is equivalent to 26 coal fired power plants or 19 million passenger vehicles. Clearly, the gas transported by MVP will contribute to worsening climate impacts that include predictable negative impacts on health.

The location of the proposed Lambert CS is a health hazard for several reasons. First, it is less than a mile from the Transco compressor stations, 165 and 166. The combined hp of the Lambert and Transco stations is over 120,000 hp, possibly making this one of the most concentrated locations of

compressor stations in the United States. Second, according to the environmental justice analysis conducted by MVP, there are environmental justice populations within the 3, 5 and 10 mile radii of the facility. These factors raise concerns about the burden of pollution on EJ communities as well as the safety of the people located near the compressor stations in the event of explosions.

The proposed Lambert CS air permit does not adequately address either of these concerns. While the pollution limits and controls appear to be stringent, the permit does not reference or include the pollution from Transco 165 and 166. Each Transco CS is allowed up to 300 startup and shutdown procedures per year not to exceed 100 hours. Lambert is limited to 17.32 hours of start up and shut down. These procedures release methane and the other constituents of the gas, including hazardous air pollutants, without pollution controls. These intermittent peak emissions of pollutants during maintenance or emergency situations may be harmful to nearby populations, especially if they are occurring temporally. Unfortunately it is impossible to determine how frequently, at what duration or at what quantities these exposures take place.

In addition, according to the 2017 EPA National Emissions Inventory, the Transco facility released 415 pounds of hexane and a highly concerning 30,036 pounds of formaldehyde in that year.<sup>1</sup> The Lambert CS will exceed the exemption rate for formaldehyde and in the absence of a critical evaluation of the combined Transco and Lambert releases, the health of nearby residents may be put at risk.

Environmental justice communities are especially vulnerable to air pollutants due to the incidence of pre-existing conditions. The [American Lung Association](#) reports annually on the state of the air and describes the vulnerable groups within cities and counties. The total population of Pittsylvania County is 60,949, Children and elders over the age of 65, both sensitive groups to air pollution, account for 11,523 and 13,790 of the total respectively. In addition, there are 4,980 people with cardiovascular disease, 3,657 with chronic obstructive pulmonary disease, 4,171 adults and 824 children with asthma. No door-to-door survey was

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<sup>1</sup> <https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data>

done to establish the health status of nearby residents, but given the poverty and minority status in census tracts around the CS we can assume that some of these conditions are present in the fence line neighbors. When the new emissions from Lambert are combined with the emissions from Transco, the burden of pollution in this community is likely a hazard even though regional National Ambient Air Quality Standards are met.

The Department of Environmental Quality and the applicant claim that there are no disproportionate health impacts from these polluting facilities because the permits require ambient air to conform to the NAAQS and therefore pose no harm or hazard to anyone. The problem with this claim is that neither the DEQ nor the applicant has any data or evidence to prove that there is no harm to nearby residents. They have no exposure measurements, including dose or duration of exposure for any of the hazardous air pollutants associated with natural gas emitted directly by the compressor station. Instead ambient air measures for criteria pollutants from distant locations and estimates from modeled pollutants are considered sufficient to claim no harm. In spite of the difficulty in attributing health effects to compressor stations or gas infrastructure generally, there is no doubt in the scientific community that the air pollutants released by these facilities are hazardous to human health. Until proven otherwise, it is therefore precautionary to assume that these facilities, as known emitters of hazardous pollutants, would contribute to morbidity and mortality in the surrounding community.