



## **GROUP AGAINST SMOG & POLLUTION**

**5135 Penn Avenue  
Pittsburgh, PA 15224  
412-924-0604  
gasp-pgh.org**

May 12, 2014

**VIA EMAIL & US MAIL**

Alexander Sandy  
Pennsylvania DEP  
400 Waterfront Drive  
Pittsburgh, PA, 15222  
asandy@pa.gov

Dear Mr. Sandy,

Please accept the enclosed comments on behalf of the Group Against Smog and Pollution (GASP) regarding proposed Air Quality Plan Approval PA-65-01017A, Mountain Gathering, LLC - Westmoreland Compressor Station, Fairfield Township, Westmoreland County (44 Pa.B. 2271, Apr. 12, 2014).

If you have any questions or require any additional information please feel free to contact me. Thank you for providing this opportunity to comment.

Sincerely,

Joe Osborne  
Legal Director

**GROUP AGAINST SMOG AND POLLUTION (GASP) COMMENTS REGARDING  
PROPOSED AIR QUALITY PLAN APPROVAL PA-65-01017A  
MOUNTAIN GATHERING, LLC - WESTMORELAND COMPRESSOR STATION**

**I. The Department’s source determination analysis is inadequate because it fails to consider the adjacent XTO Energy, Inc. Fairfield Township Pig Station**

The Department’s source determination analysis for the Westmoreland Compressor Station focused solely on whether the “Marcellus Shale natural gas wells operated by XTO, the parent company of Mountain Gathering,” that would supply natural gas to the compressor station should be aggregated with the compressor station.<sup>1</sup> DEP found that the compressor station and “upstream production wells meet two of the three [aggregation] requirements; they belong to the same industrial grouping and operate under common control.”<sup>2</sup> However, DEP did not believe these emission units satisfied the final “contiguous or adjacent” aggregation requirement and thus chose not to treat the wells and compressor station as a single source.

DEP’s aggregation analysis focused solely on upstream well sites operated by XTO energy. Such a restricted source determination scope cannot be reconciled with the broad regulatory definition of source:<sup>3</sup> Among the pollution sources DEP failed to consider is the Fairfield Township Pig Station. The pig station appears to satisfy the three-factor aggregation test: it is operated by XTO Energy, Inc., the parent of Mountain Gathering, LLC; like the proposed compressor station it is engaged activities related to natural gas in compressor station’s industrial grouping; and is located on the parcel adjacent to (and less than ¼ mile from) the proposed Westmoreland Compressor Station site.<sup>4</sup>

The emissions calculations provided by Mountain Gathering as part of the Westmoreland Compressor Station Application include a table labeled “Emissions from Exempted Facilities.”<sup>5</sup> This table includes 2 compressor engines and “Pigging Emissions,” which suggests these sources may be located at the Fairfield Township Pig Station.<sup>6</sup> These 3 emission units produce a combined NOx PTE of over 33 TPY, and a combined VOC PTE over 13 TPY.<sup>7</sup> If these emission units are in fact located at the Fairfield Township Pig Station, aggregating the pig station with the Westmoreland Compressor Station would cause the facility-wide potential to emit both NOx and VOC to exceed NSR major source thresholds.

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<sup>1</sup> PADEP, Review of Plan Approval Application for Mountain Gathering, LLC - Westmoreland Compressor Station (PA-65-01017A) (Apr. 7, 2014) at 8 – 10.

<sup>2</sup> *Id.* at 9.

<sup>3</sup> “any building, structure, facility, or installation which emits or may emit a regulated NSR pollutant” 40 CFR § 52.21(b)(5); “*Building, structure, facility, or installation* means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control)” 40 CFR § 52.21(b)(B); 25 Pa. Code §121.1 – definitions of “Facility” and “Title V Facility”; Department of Environmental Protection Bureau of Air Quality, “Guidance for Performing Single Stationary Source Determinations for Oil and Gas Industries,” Doc. No. 270-0810-006 (Oct. 6, 2012).

<sup>4</sup> Exhibit A., Multiple Pipeline Right of Way and Easement to XTO Energy, Inc. (Mar. 23, 2010) at 5.

<sup>5</sup> Exhibit B, Mountain Gathering Emission Calculations (Mar. 10, 2014) at [PDF page] 5.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 5, 11.



## II. The draft plan approval reference to GT Exhaust engine catalyts may be in error.

The draft plan approval states that that the Caterpillar G3606 engines will be “controlled by GT Exhaust oxidation catalyts.”<sup>8</sup> While the permit application materials provided to GASP include several catalyst specification sheets, no GT Exhaust specification sheet was provided. Thus the plan approval reference to GT Exhaust may be in error.

<sup>8</sup> PADEP, Draft Plan Approval (PA-65-01017A) Mountain Gathering, LLC - Westmoreland Compressor Station (Apr. 16, 2014) at 16.