

Amy Hutchens, Leesburg, VA.

FERC Docket #PF12-16

I join my neighbors, the Honorable Janet Clarke, the Sierra Club and the American Public Gas Association in objecting to the expansion of the Dominion LNG Compressor Station at Cove Point Lane, Loudoun County, Virginia. I respectfully recommend that the Fairfax compressor station be used to meet Dominion's business needs if the project must be approved at all. I have two bases for my objection, one is the past and current inability of Dominion to run their facilities in compliance with the laws and regulations that govern them. The second basis is that the expansion of the facility will increase the amount of hazardous waste produced at the facility and increase the amount of toxins released into the air right next to my neighborhood. I address these issues below.

I had the opportunity to review a substantial amount of legal compliance information from the Virginia Department of Environmental Quality (DEQ) regarding Dominion's two compressor stations located next to my neighborhood, Greene Mill Preserve. Through the Freedom of Information Act, I reviewed approximately 730 documents related to Dominion's permit to operate the facility, its mandatory reporting on Continuous Emissions Monitoring Systems (CEMS), and other compliance related information including Letters of Warning issued by the DEQ.

Dominion has received multiple Letters of Warning, including two in the past year. Due to the below timeline of non-compliance with state regulations, I am seriously concerned about Dominion expanding ANY facility. If Dominion cannot stay in compliance with the laws and regulations that govern it, it should not earn the right to increase the size, capability, or horsepower of its facilities or the amount of toxins released into our environment.

October 2011: A Letter of Warning was issued to Dominion for failure to conduct a 3rd quarter cylinder gas audit of the nitrous oxide Continuous Emission Monitoring System in violation of its permit

January 2012: Dominion files an Excess Emission Report (EER) stating that its Continuous Emissions Monitoring System equipment had 21 hours of downtime in Q4 of 2011 due to "unknown causes"

April 2012: Dominion filed an Excess Emission Report (EER) due to the extended downtime of its Continuous Emission Monitoring System because its "UPS" (uninterrupted power system) failed

June 2012: the Continuous Emissions Monitoring System was down again due to a calibration malfunction of a faulty regulator

January-June 2012 Dominion reports 901 hours of downtime of its Continuous Emissions Monitoring System, stating that of the 901 hours of downtime, 879 were due to "unknown causes." The Continuous Emissions Monitoring System was down 44.5% percent of the time during this time period.

July 2012: Dominion is declared "out of compliance" with its state permit according to 9 VAC 5-50-40, for failing to maintain its Continuous Emission Monitoring System for nitrous oxide

August 2012: A Letter of Warning was issued to Dominion for unacceptable test results that exceeded mid-level test for nitrous oxide

In conclusion, it appears that Dominion has a difficult time keeping their monitoring system up and running - which is the key control in place to ensure compliance with state and federal emissions laws. If Dominion struggles so much with that monitoring system, one cannot help but wonder what else they are having difficulty maintaining.

My second basis for objection relates to the environment. The facility is already rated as a Large Quantity Generator (LQG) by the Environmental Protection Agency, meaning that it produces more than 2,200 lbs per month of hazardous waste. The facility is also, obviously, emitting toxins into the environment in the form of several noxious gasses. My husband is a 100% combat disabled veteran with severe respiratory disease from 9/11 at the Pentagon. I am concerned for him and others like him who struggle with respiratory disease. The proposed Dominion expansion is only 1600 feet from the closest house in our neighborhood. I believe that allowing expansion of this facility over another facility that is located in a more remote area would be detrimental to the health of our community and demonstrate poor stewardship of our community environment.

Based on these reasons, I object to the Dominion LNG Compressor Station expansion project, the subject of Docket number PF12-16.

Respectfully,
Amy E. Hutchens

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