



**Federal Energy
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Natural Gas Pipeline Company of America, LLC

Docket No. CP17-484-000

2012 Storage Optimization Project Amendment

Environmental Assessment

Washington, DC 20426

**Natural Gas Pipeline of America, LLC (Natural)
2012 Storage Optimization Project Amendment**

ENVIRONMENTAL ASSESSMENT

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**Natural Gas Pipeline of America, LLC (Natural)
2012 Storage Optimization Project Amendment**

ENVIRONMENTAL ASSESSMENT

A. PROPOSED ACTION AND BACKGROUND

On August 1, 2017, Natural Gas Pipeline Company of America, LLC (Natural) filed an application to amend its May 17, 2012 Order Issuing Certificate, Authorizing Abandonment, and Authorizing an Increase in Storage Deliverability (Order) in the Federal Energy Regulatory Commission (FERC) Docket No. CP11-547-000. Natural's application requests that certain compressor units previously authorized for abandonment at its Compressor Stations CS 310 (compressors 1 and 7) and CS 311 (compressors 2 and 5) in Clinton and Platt Counties, Illinois, respectively be retained for backup compression. Natural states that retaining these compressor units would provide redundant, back-up compression to enhance the reliability and flexibility of its operational capabilities and provide uninterrupted service in case of mechanical issues at the compressor stations.

Background

On September 20, 2011, Natural filed an application with the FERC in Docket No. CP11-547-000 for a Certificate of Public Convenience and Necessity and authorization under Sections 7(b) and 7(c) of the Natural Gas Act, and Part 157 of the Commission's regulations.¹

As part of Natural's application, it sought to abandon in-place:

- two compressor units totaling 5,600 horsepower (HP) of compression at its existing CS 310 in Centralia, Clinton County, Illinois; and
- three compressor units totaling 8,400 HP of compression at its existing CS 311, which is 2 miles west of Hammond in Piatt County, Illinois.

All abandonment activities at both compressor stations were previously proposed to occur within Natural's graveled workspace on the compressor stations, and no ground disturbance was proposed as a result of the compressors' abandonment.

¹ Natural Gas Pipeline of America LLC September 20, 2011 Application for a Certificate of Public Convenience and Necessity in FERC Project Docket CP11-547-000 Accession Number 20110920-5036.

B. ENVIRONMENTAL ANALYSIS

Natural states that with the retention of these compressor units, there would be no ground disturbance at either compressor station, which is consistent with the impacts stated in our February 1, 2012 Environmental Assessment (EA)² for abandonment of the CS 310 and CS 311 compressor units. Based on our review of the project, the following resources are either not present or would not be affected by the continued use of the four compressor units at CS 310 and CS 311 and will not be discussed further:

- geologic resources (minerals and fossil fuel production);
- geologic hazards;
- soils;
- groundwater, surface water, and wetlands;
- vegetation, fisheries, wildlife, and threatened and endangered species (as stated in the February 1, 2012 EA, the project would have *no effect* on Endangered Species Act listed species);
- cultural resources (as stated in the February 1, 2012 EA, the Illinois State Historic Preservation Office concluded, and we concurred that activities within previously disturbed yards at existing compressor stations, including the abandonment in-place of units at CS 310 and 311, are not likely to adversely affect historic properties); and
- land use, recreation, and visual resources.

We conclude the following resources would not be adversely affected by the project, as discussed further below:

- air quality;
- noise; and
- cumulative impacts.

Air Quality Impacts

As stated in the air quality section of the February 1, 2012 EA, CS 310 and CS 311 are already major sources for prevention of significant deterioration. However, the retirements of certain compressor units and associated engines at CS 310 and CS 311 reduced air emissions. Furthermore, as stated in the February 1, 2012 EA, the abandonment of the two compressor units at CS 310 resulted in a 998.64 tons per year (tpy) reduction in nitrogen oxides (NO_x) emissions and an 87.07 tpy reduction in carbon

² Environmental Assessment Natural Gas Pipeline of America, LLC 2012 Storage Optimization Project. Accession Number 20120201-4002.

monoxide (CO) emissions. The abandonment of the three compressor units at CS 311 result in a 995.53 tpy reduction in NO_x and a 121.22 tpy reduction in CO emissions. Under Natural's amendment, these emissions would not be emitted except when used as backup units. During this time, certain primary units would not be running.

Ambient air quality is protected by federal and state regulations. The Clean Air Act and its amendments designate six pollutants as criteria pollutants for which the National Ambient Air Quality Standards (NAAQS) are promulgated. The NAAQS for sulfur dioxide, nitrogen dioxide, particulate matter (PM), including PM less than 10 microns in aerodynamic diameter and PM less than 2.5 microns in aerodynamic diameter, CO, ozone, and lead were set by the U.S. Environmental Protection Agency to protect human health (primary standards) and public welfare (secondary standards). The current NAAQS for these criteria pollutants are available on the U.S. Environmental Protection Agency's website.³ Clinton and Piatt Counties, Illinois are in attainment for all criteria pollutants in the NAAQS.

At CS 310, Natural is requesting to retain Compressor Units 1 and 7 and at CS 311, Natural is requesting to retain Compressor Units 2 and 5. Natural states that both stations would keep these units in reserve for use in providing intermittent, backup capacity when other units are not available, such as during periods of maintenance or repair; and would only operate these compressors when other units at the compressor stations are not available.

CS 310 and CS 311 are configured with the identical horsepower. Each station is comprised of nine natural gas fired compressor units, with a total certificated horsepower of 30,600 HP at each station. Units 1 through 7 are 2,800 HP units and units 9 and 10 are 5,500 HP units. As originally authorized in the Order, operations of CS 310 would remain limited to a maximum horsepower not to exceed 25,000 HP, and at CS 311 the operations would continue to be limited to a maximum horsepower not to exceed 22,200 HP.

Retention of the proposed compressor units at CS 310 and CS 311 would result in them being operated only as intermittent, back-up compressors when other units are not operating, and as such, the emissions associated with their operation would be short-term and minor. Natural would continue operating CS 310 and CS 311 under its existing state issued air operating permits, and Natural would adhere to the same federal and state regulations stated in the EA. Therefore, we believe the operation of the proposed amendment would not result in any increase or impact on air emissions.

³ The current NAAQS can be accessed online at <https://www.epa.gov/criteria-air-pollutants/naaqs-table>.

Noise Impacts

As stated in the noise section of the February 1, 2012 EA, short-term, temporary noise impacts associated with the construction activities at CS 310 and CS 311 would primarily result from the use of heavy construction equipment and machinery.

No new noise sources are proposed at CS 310 and CS 311, and the noise emissions would actually decrease with the retirement of select compressor units. The existing noise environments at these two compressor stations were not quantified in the February 1, 2012 EA for Natural's 2012 Storage Optimization Project. As shown in appendix E of Resource Report 9 (CP11-547-000),⁴ there are three noise sensitive areas (NSAs) from each CS 310 and CS 311. When the backup units are running, certain numbers of the primary units at CS310 and 311 would not be running.

Because retention of the compressor units, as currently requested by Natural, would result in them being operated intermittently and only as backup when other units are not operating, the noise generated would be consistent with the noise emitted from the other units that would be shut down during the proposed unit's operation. Considering this, we conclude the operation of the proposed amendment would not result in any increased impact on noise quality.

Cumulative Environmental Impacts

Cumulative impacts may result when the environmental effects associated with a project are superimposed on, or added to, either temporary (construction related) or permanent (operation related) impacts associated with past, present, or reasonably foreseeable projects or activities. Although the individual impacts of each project might not be significant, the cumulative impacts of multiple projects could be significant. In accordance with NEPA, the cumulative impacts of the project along with other projects were considered. The project's direct and indirect impacts are described in the preceding sections of this EA.

Inclusion of other actions is based on identifying commonalities of impacts from other actions with those of this project. An action must meet the following criteria:

- impact a resource potentially affected by the proposed action;
- cause the impact within all, or part of, the project vicinity; and
- cause the impact within all, or part of, the time span of the project.

⁴ Filed on September 20, 2011, accession No. 20110920-5036

As discussed above, there is no land disturbance associated with the retention of the proposed compressor units at CS 310 and CS 311, and Natural would continue operating CS 310 and CS 311 under their existing state issued air operating permits.

The air emissions and noise generated by the retention of the compressor units would be minimal, resulting in them being operated only as intermittent, and temporary back-up compressors, when other units are not operating. As such, the impacts associated with operating the temporary back-up compressor units when other units are down would not be a perceptible change in impacts on air quality or noise from those that already occur, or from what was previously analyzed in the February 1, 2012 EA. Therefore, we do not anticipate any cumulative environmental impacts associated with retention of these compressor units.

C. ALTERNATIVES

In accordance with NEPA and Commission policy, we evaluated alternatives to the project to determine whether they would be reasonable and environmentally preferable to the proposed action.

The evaluation criteria used for developing and reviewing alternatives were:

- technical feasibility and practicality;
- significant environmental advantage over the proposed action; and
- ability to meet the project's stated objectives.

Under the no-action alternative, the environmental impacts analyzed in this EA would not occur. However, Natural's objective of providing redundant-back up compression to enhance the reliability and flexibility of its operational capabilities and provide uninterrupted service at its compressor stations would not be met. Other natural gas projects could be constructed to provide a substitute for the natural gas reliability and flexibility offered by Natural. Such alternative projects would require the construction of additional and/or new facilities in the same or other locations to meet the project objectives. These alternatives would result in their own set of specific environmental impacts that would likely be greater than those associated with the current proposal. Therefore, we have dismissed this alternative as a reasonable alternative to meet the project objective.

Because the proposed project did not present any environmental concerns, and because no comments have been received regarding the proposed project, no additional alternatives have been evaluated. We conclude that the proposed action is the preferred alternative to meet the project objectives.

D. CONCLUSIONS AND RECOMMENDATIONS

Based on the analysis in this EA, we have determined that if Natural operates the proposed facilities in accordance with its application and the staff's recommended mitigation measures below, approval of the project would not constitute a major federal action significantly affecting the quality of the human environment. We recommend that the Commission Order contain a finding of no significant impact and include the measures listed below as conditions in any authorization the Commission may issue to Natural.

1. Natural shall follow the procedures and mitigation measures described in its application and as identified in the EA, unless modified by the Order. Natural must:
 - a. request any modification to these procedures, measures, or conditions in a filing with the Secretary;
 - b. justify each modification relative to site-specific conditions;
 - c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
 - d. receive approval in writing from the Director of the Office of Energy Projects (OEP) **before using that modification.**

2. The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of all environmental resources during operation of the project. This authority shall allow:
 - a. the modification of the conditions of the Order;
 - b. stop-work authority; and
 - c. the imposition of any additional measures deemed necessary to assure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from project operation.

E. LIST OF PREPARERS

Rana, Anthony – Project Manager

M.S., International Development, Tulane University, 2012

Graduate Studies, Hydrogeology and Geochemistry, Oklahoma State University, 1988

B.S., Geology, New Jersey City University, 1984

Jacaman, Kandilarya – Air Quality, Noise, and Safety

B.S., Chemical Engineering, 2003, University of Maryland, College Park

M.E., Environmental Engineering/Project Management, 2006, University of Maryland College Park

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