

**Office of
Energy Projects**

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National Fuel Gas Supply Corporation

Docket No. CP20-53-000

Amendment to West Side Expansion and Modernization Project

Environmental Assessment

Washington, DC 20426

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TECHNICAL ABBREVIATIONS AND ACRONYMS

CAA	Clean Air Act
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalents
CFR	Code of Federal Regulations
dBA	decibels on the A-weighted scale
HP	horsepower
EA	environmental assessment
EPA	U.S. Environmental Protection Agency
FERC	Federal Energy Regulatory Commission; <i>also</i> Commission
GHG	greenhouse gases
HP	horsepower
L _{dn}	Day-night sound level
NAAQS	National Ambient Air Quality Standards
National Fuel	National Fuel Gas Supply Corporation
NEPA	National Environmental Policy Act of 1969
NGA	Natural Gas Act
NOI	<i>Notice of Intent to Prepare an Environmental Assessment for the Proposed Amendment to West Side Expansion and Modernization Project and Request for Comments on Environmental Issues</i>
NO _x	oxides of nitrogen
NSA	noise sensitive area
OEP	Office of Energy Projects
Order	<i>Order Issuing Certificate and Authorizing Abandonment for the West Side Expansion and Modernization Project, March 2, 2015</i>
PADEP	Pennsylvania Department of Environmental Protection
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to 10 microns
Project	National Fuel Gas Supply Corporation's Amendment to West Side Expansion and Modernization Project
Secretary	Secretary of the Commission
SO ₂	sulfur dioxide
West Side EA	West Side Expansion and Modernization Project, Environmental Assessment in Docket No. CP14-70-000

A. PROPOSED ACTION

A.1 Introduction

On February 18, 2020, National Fuel Gas Supply Corporation (National Fuel) filed an application pursuant to section 7(c) of the Natural Gas Act (NGA) to amend the Certificate of Public Convenience and Necessity issued by the Federal Energy Regulatory Commission (FERC or Commission) on March 2, 2015 in Docket No. CP14-70-000 authorizing the West Side Expansion and Modernization Project.

In Docket No. CP14-70-000, National Fuel received, among other things, authorization to designate 1,775 horsepower (HP) of compression out of 7,100 HP as “spare” compression at the Mercer Compressor Station in Mercer County, Pennsylvania. In its March 2, 2015 *Order Issuing Certificate and Authorizing Abandonment* (Order), the Commission conditioned the authorization of the “spare” compression stating that “National Fuel cannot, without grant of additional certificate authorization, use any of the spare compression to satisfy intermittent demand for interruptible or secondary firm service or requests for short-term firm service during scheduled maintenance intervals.” National Fuel now seeks to remove the “spare” designation from this compression. We refer to this amendment as the “Project”.

We¹ prepared this environmental assessment (EA) in compliance with the requirements of the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality regulations for implementing NEPA (Title 40 of the Code of Federal Regulations Parts 1500-1508 [40 CFR 1500-1508]), and the Commission’s implementing regulations under 18 CFR 380. Our principal purposes in preparing this EA are to identify and assess potential impacts on the natural and human environment that could result from implementation of the proposed action, and to identify and recommend reasonable alternatives and specific mitigation measures, as necessary, to avoid or minimize project-related environmental impacts. The EA is an integral part of the Commission’s decision-making process in determining whether to authorize National Fuel’s proposal.

¹ “We,” “us,” and “our” refer to the environmental staff of the Commission’s Office of Energy Projects.

A.2 Purpose and Need

National Fuel's stated purpose is to remove the "spare" designation from 1,775 HP of compression at its Mercer Compressor Station to accommodate a subscribing shipper's request to direct a portion of its firm transportation capacity to a different primary delivery point.

A.3 Public Review and Comment

On March 26, 2020, the Commission issued a *Notice of Intent to Prepare an Environmental Assessment for the Proposed Amendment to West Side Expansion and Modernization Project and Request for Comments on Environmental Issues* (NOI). Due to the limited scope of the Project, the NOI was mailed to landowners located within 0.5 mile from the Mercer Compressor Station and other federal agencies. In response to the NOI, the Commission received no environmental comments.

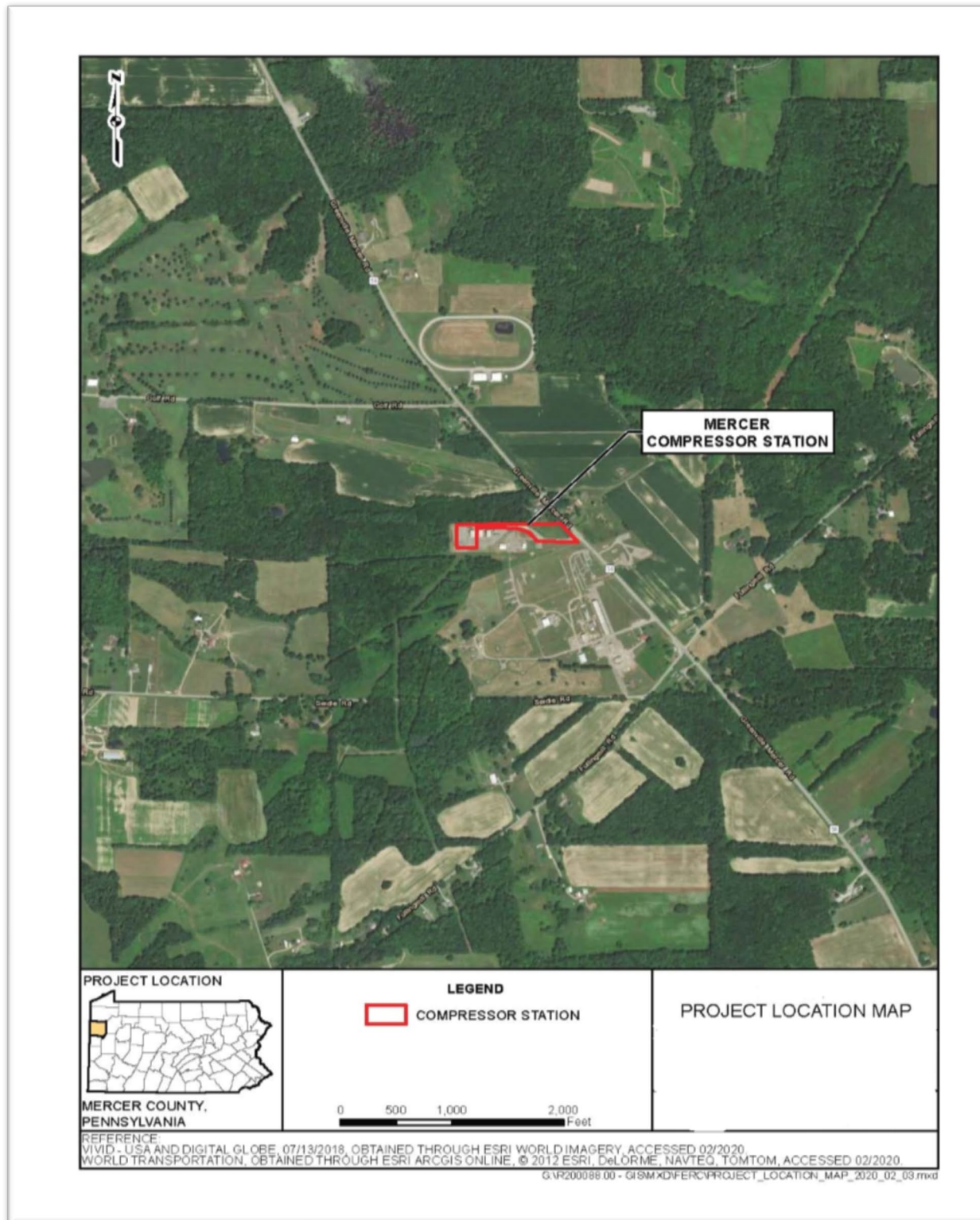
A.4 Proposed Facilities

The reclassification of compression would not involve new equipment or any physical changes to existing equipment within the Mercer Compressor Station building; and therefore, no ground disturbance would occur. Any future modifications to the Mercer Compressor Station would require National Fuel to seek the appropriate authorizations from the Commission and appropriate regulatory agencies. The location of the Mercer Compressor Station is shown in Figure 1.

A.5 Permits, Approvals, and Regulatory Consultations

National Fuel states that the proposed reclassification of the Mercer Compressor Station would only require a FERC Certificate. The West Side Expansion and Modernization Project was granted an air quality permit on January 24, 2017 by the Pennsylvania Department of Environmental Protection (PADEP). National Fuel states that this permit authorization is still in effect and the reclassification requested here would require no modifications to the permit.

Figure 1. Project Overview Map



B. ENVIRONMENTAL ANALYSIS

Based on our review of the Project, the following resources would not be affected and therefore, are not addressed further in this analysis:

- geological resources and soils;
- water resources;
- vegetation and wildlife;
- land use;
- socioeconomics;
- cultural resources, and
- visual resources.

B.1 Air Quality and Noise

B.1.1 Air Quality

Federal and state air quality standards are designed to protect human health. The U.S. Environmental Protection Agency (EPA) has developed National Ambient Air Quality Standards (NAAQS) for criteria air pollutants such as nitrogen oxides (NO_x) and carbon monoxide (CO), the primary pollutants emitted by natural gas-fired compressor facilities. Other relevant criteria air pollutants include ozone, sulfur dioxide (SO₂), and inhalable particulate matter (PM_{2.5} and PM₁₀). PM_{2.5} includes particles with an aerodynamic diameter less than or equal to 2.5 microns, and PM₁₀ includes particles with an aerodynamic diameter less than or equal to 10 microns. The NAAQS were set at levels the EPA believes are necessary to protect human health and welfare, including vulnerable populations such as children and the elderly.

Air Quality Control Regions are areas for which implementation plans describe how ambient air quality standards would be achieved and maintained. Air Quality Control Regions are defined by the EPA and state agencies in accordance with the Clean Air Act of 1970 (CAA). If measured ambient air pollutant concentrations for a subject area remain below the NAAQS criteria, the area is considered to be in attainment with the NAAQS. The Project is situated within an attainment area.

Greenhouse gases (GHG) occur in the atmosphere both naturally and as a result of human activities, such as the burning of fossil fuels. The primary GHGs produced by fossil fuel combustion are carbon dioxide (CO₂), methane, and nitrous oxide. During operation of the Project, these GHGs would be emitted from any fossil-fuel fired combustion engines. Methane is the primary component of natural gas and is released by blowdown events under certain routine operations or emergency conditions. In addition, methane emissions could occur due to leaks from pipeline and system components such as equipment packing, seals, valves, flanges, pneumatic devices, and connectors at pipeline facilities, compressor stations, and meter and pressure regulation stations. Emissions of GHGs are typically expressed in terms of carbon dioxide

equivalents (CO_{2e}), where the potential of each gas to increase heating in the atmosphere is expressed as a multiple of the heating potential of CO₂, or its global warming potential.

Impacts on air quality and noise resulting from operation of the Mercer Compressor Station were assessed and disclosed in the EA issued for the West Side Expansion and Modernization Project in Docket No. CP14-70-000 (West Side EA). Furthermore, the West Side EA accounted for the impacts of the “spare” compression and concluded that constructing and operating the West Side Expansion and Modernization Project would not result in a significant impact on the environment. As described below, reclassifying 1,775 HP of compression as proposed would not result in impacts exceeding those analyzed and disclosed in the West Side EA.

The Project would not result in construction emissions, as no construction activity is proposed. Additionally, although the Project would result in an increase in emissions at the Mercer Compressor Station, the facility emissions would not exceed the emissions analyzed in the West Side EA and authorized by the March 2, 2015 Order. These emissions are small. The estimated increase in emissions associated with the Project are identified in Table 1. Operation of the Project would not cause an exceedance of the emission limits identified in the PADEP air quality permit. We conclude there would be no significant air quality impacts from the Project.

Table 1. Estimated Operational Emissions Increase Mercer Compressor Station (tons/year)							
NO _x	CO	VOC ^a	SO ₂	PM ₁₀	PM _{2.5}	Total HAPs ^b	GHG
9.2	3.5	5.7	<0.1	0.55	0.55	2.0	7,559
^a Volatile organic compounds ^b Hazardous air pollutants							

B.1.2 Noise

There would be no noise impact from construction, as no construction activity is proposed. Operational noise would increase over observed existing levels at the nearest noise sensitive areas (NSA). However, the noise levels should not increase over the noise levels identified in the West Side EA and previously considered and authorized by the March 2, 2015 Order. Additionally, the noise impacts, as previously identified in Docket No. CP14-70-000 are not estimated to exceed 55 A-weighted day-night averaged (L_{dn}) decibels (dBA) at any NSA.

However, to confirm that noise from the proposed modifications at the Mercer Compressor Station does not contribute to significant impacts at the nearest NSA, **we recommend that:**

- National Fuel should file a noise survey with the Secretary of the Commission (Secretary) no later than 60 days after placing the modified Mercer Compressor Station in service. If a full load condition noise survey is not possible, National**

Fuel should provide an interim survey at the maximum possible horsepower load and provide the full load survey within 6 months. If the noise attributable to the operation of all of the equipment at the Mercer Compressor Station under interim or full horsepower load conditions exceeds an L_{dn} of 55 dBA at any nearby NSA, National Fuel should file a report on what changes are needed and should install the additional noise controls to meet the level within 1 year of the in-service date. National Fuel should confirm compliance with the above requirement by filing a second noise survey with the Secretary no later than 60 days after it installs the additional noise controls.

With the existing noise mitigation equipment at the Mercer Compressor Station, and our recommendation, we conclude that the Project would not significantly affect noise in the area.

B.2 Reliability and Safety

The Project would be designed, operated, and maintained in accordance with the U.S. Department of Transportation pipeline safety regulations found in 49 CFR 192 and all applicable permits. Safety guidelines for the design and construction of aboveground facilities, including compressor stations, are established in 49 CFR 192.163 - Compressor stations: Design and construction. Each compressor station must have an emergency shutdown system (except for unattended field compressor stations of 1,000 horsepower or less) that must meet several specifications. Additionally, 49 CFR 192.171 requires that each compressor station be equipped with adequate fire protection facilities that are not impeded by the emergency shutdown system. We conclude that, with the implementation of the standard safety design criteria, the Project would be operated safely.

B.3 Cumulative Impacts

In accordance with NEPA, we analyzed the impacts of the Project and the known impacts of other past, present, and reasonably foreseeable future projects (and actions) to determine the potential for cumulative impacts. Cumulative impacts occur when the incremental impacts of an action are added to the impacts of other past, present, or reasonably foreseeable future projects. The Council of Environmental Quality, states that an adequate cumulative effects analysis may be conducted by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions. In this analysis, we consider the impacts of past projects as part of the affected environment (environmental baseline) which was described and evaluated in the preceding environmental analysis. However, present effects of past actions that are relevant and useful are also considered.

To determine if potential cumulative impacts exist, we review other projects located, or whose impacts would be located, in areas affected by a project. We refer to an area affected by a project and subject to a cumulative impacts analysis as a “geographic scope”. Other projects and actions located within a geographic scope or whose impacts occur within a geographic scope may contribute to a cumulative impact. Projects and actions located outside a geographic scope are

generally not considered because their potential to contribute to a cumulative impact diminishes with increasing distance from the Project.

We have not identified any new air emission sources that would cause significant cumulative air quality impacts when combined with the Mercer Compressor Station. Similarly, we have not identified other industrial facilities nearby whose impacts when combined with those of the Project would result in a significant cumulative noise impact. Therefore, based on the scope of the Project, the resulting impacts as identified and described in the preceding analysis, and our review of cumulative impacts in the West Side EA, which assessed the cumulative impact of the Mercer Compressor Station (including the full amount of compression) and the impacts of nearby oil and gas well facilities, we conclude that the impacts of other projects when added to the impacts resulting from the reclassification of compression would not result in significant cumulative impacts on noise and air quality.

C. ALTERNATIVES

C.1 No-Action Alternative

In accordance with NEPA and Commission policy, we considered the No-Action Alternative as discussed below and sought to identify and evaluate reasonable alternatives to the Project. A reasonable alternative should meet the stated purpose of the Project and be technically and economically feasible and practical. Furthermore, we would recommend a reasonable alternative, if when implemented, it would provide a significant environmental advantage when compared to the proposed Project.

Implementing the No-Action Alternative would maintain the current operation of the Mercer Compressor Station and would not result in the removal of the “spare” designation from 1,775 HP of compression. As a result, this compression would not be available for regular use to accommodate the subscriber’s request to redirect a portion of its firm transportation capacity to a different primary delivery point. Not removing the “spare” designation would avoid affecting the environment as described previously in this document. The subscriber, who would be unable to redirect its capacity, would need to seek an alternative means of delivery. Alternatives means could include the construction of a new pipeline or the use of another system to deliver the desired capacity. These alternatives would result in their own set of specific environmental impacts that could be equal to or greater than those described for the current proposal.

The No-Action Alternative would not meet the stated purpose of the proposed Amendment to West Side Expansion and Modernization Project. If the Commission were to deny the Project, it could require other natural gas companies to increase capacity to accommodate the subscriber’s request, which could result in the construction of additional and/or new pipeline facilities in the same or other locations as the existing Mercer Compressor Station. Thus, resulting in their own set of specific environmental impacts. Therefore, we conclude that the No-Action Alternative would not provide a significant environmental advantage over the proposed action.

C.2 Siting Alternatives

National Fuel proposes the removal of the “spare” designation from available compression at the Mercer Compression Station to facilitate the delivery request of a subscriber. The proposed action involves no environmental footprint and as concluded in the analysis presented in this EA has only limited impacts associated with air and noise. No substantial adverse impacts were identified during scoping or in our analysis of the Project and no commenters suggested that an alternative be considered. Therefore, we did not identify any alternatives that could provide a significant environmental advantage over the Project as proposed, and we identified no alternatives that could satisfy all three of our evaluation criteria. In summary, we have determined that the proposed Project, as modified by our recommended mitigation measures, is the preferred alternative that can meet the Project’s objectives.

D. CONCLUSIONS AND RECOMMENDATIONS

Based on the analysis in this EA and our review of National Fuel's application, we conclude that if National Fuel operates the facilities in accordance with its application, along with our recommended mitigation measures listed below, approval of this proposal 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 following mitigation measures as conditions to any Certificate the Commission may issue.

1. National Fuel shall follow the operation procedures and mitigation measures described in its application and supplements, (including responses to staff data requests) and as identified in the EA, unless modified by the Order. National Fuel 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), or the Director's designee, **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 environmental resources during operation of the Project. This authority shall allow:
 - a. the modification of conditions of the Order;
 - b. stop-work authority; and
 - c. the imposition of any additional measures deemed necessary to ensure 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.
3. National Fuel shall file a noise survey with the Secretary **no later than 60 days** after placing the modified Mercer Compressor Station in service. If a full load condition noise survey is not possible, National Fuel shall provide an interim survey at the maximum possible horsepower load and provide the full load survey **within 6 months**. If the noise attributable to the operation of all of the equipment at the Mercer Compressor Station under interim or full horsepower load conditions exceeds an L_{dn} of 55 dBA at any nearby NSA, National Fuel shall file a report on what changes are needed and shall install the additional noise controls to meet the level **within 1 year** of the in-service date. National Fuel shall confirm compliance with the above requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls.

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