

# Testimony of 11 citizens against the Passyunk Energy Center Submitted to Philadelphia Gas Commission & 350 Philadelphia between October 30 & November 28, 2018

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Oct 30 2018

Good morning,

I would like to submit a comment regarding PGW's Petition to the Philadelphia Gas Commission for Approval and Recommendation for Approval of Certain Transactions and Contracts for the Purchase, Storage, Distribution and/or Transmission of Natural and Other Gas, and Also Certain Transactions and Contracts Respecting Real Property Owned by the City of Philadelphia and Operated by the Philadelphia Gas Works.

I work in Southwest Philadelphia to provide free and low-cost public recreation and educational programs on the Lower Schuylkill River, facilitating positive experiences on a public waterway where water quality has improved greatly in the last few decades, but fossil fuel infrastructure poses ongoing environmental justice concerns. I oppose PGW's petition because continued development of fossil fuel projects is the last thing we need in neighborhoods where toxic air pollution from the sprawling petroleum refinery causes some of the highest asthma rates in the city, and in a world on the verge of catastrophic climate change. The Southwest Philadelphia community deserves reparations for over a century of public health impacts, not more of the same shortsighted development that contributes to pollution and climate change with no regard for a livable future. The city should instead support remediation of polluted land and the growth of renewable energy infrastructure to create green jobs for local residents.

Sincerely,  
Chloe Wang

Nov 5 2018

Gemela McClendon  
Executive Director, Philadelphia Gas Commission

To Ms. McClendon and staff

Thank you for extending the public comment period on the proposed LNG terminal at the Passyunk Avenue site. I write to you in opposition to this proposal. As I stated in my comments at the end of the public advocate hearing on October 29, the overall problem with the proposal extends well beyond the terminal itself. It is the entire reliance of fossil gas as a source of powering and heating homes. Originally touted as a bridge fuel, gas is actually delaying the urgency to move toward renewable energy sources such as wind and solar which comprises maybe 1% of Pennsylvania's energy needs.

There are at least two specific issues in the proposal that needs to be addressed. First is the 25 year lease to operate this liquifaction terminal. The proposed project cost of \$60 million to operate a fossil gas terminal for 25 years simply ignores what the scientists tell us about the shorter time frame we have to avoid catastrophic damage to the environment if we continue to burn gas. That \$60 million is rate payer money (could be in New England or overseas ratepayers) that could be used by the public for tax credits or other uses to foster the development of wind, solar, geothermal, hydraulic and tidal power. It is likely, 25 years from now that gas will become obsolete as the public starts to take climate change seriously and demand, albeit belatedly, that they are tired of the flooding and hurricanes. Philadelphia and its gas developers will be stuck with a stranded asset.

Second, there is no mention of methane leaks which we know is a potent greenhouse gas and is 86 times more potent than CO2 in warming the planet. Even small leaks can have serious consequences. FLIR cameras are not mentioned in the City requirements in order to ensure that there is 24 hour monitoring for methane leaks and there must be a requirement for remediation if leakage occurs.

The City is being praised for a purchase agreement to buy the solar power from Adams County for city buildings but the most shocking news in the press release is that this will be new construction. That is, no one in Pennsylvania is moving to build more solar, wind or other renewable sources because of the influence of the gas industry in suppressing the development of renewable energy and the lack of political leadership to expand solar and wind in a huge way across the state. Yet we are spending billions of dollars to build the gas pipelines and using eminent domain to seize people's properties in order to build the pipelines to transport pressurized gas. Those billions should be used to build the regional grid for renewable energy.

You are probably aware of the United Nations Intergovernmental Panel report released last month on Climate Change (IPCC) which essentially says that we have 12 years to transition away from burning fossil fuels in order to prevent catastrophic sea level rise, hurricanes, flooding and drought across the planet.

Philadelphia, while fortunate to be in a more temperate climate, is not immune from the consequences. In fact, just this past week, I received an emergency alert of a tornado warning over Chestnut Hill - an alert that I have never seen before. Catastrophic flooding could put the Philadelphia airport under water as well as the Navy Yard, water up to FDR Park and the river wards along Port Richmond and Bridesburg under daylight flooding.

I know that the Gas Commission does not consider climate change under its jurisdiction and sees that burning natural gas as a political issue beyond your purview, but in truth, the Gas Commission needs to be part of this solution and have a serious discussion of how we plan to electrify our buildings and move us away from gas. We need to see the goal of the Gas Commission as planned obsolescence and start downsizing the gas infrastructure in the next decade. Time is short and we need to be doing this now beginning with denying approval of the LNG terminal. The opportunity to redesign our energy for the 21st Century has never been clearer.

Walter Tsou, MD, MPH

Executive Director

Philadelphia Physicians for Social Responsibility

Former Health Commissioner, Philadelphia Department of Public Health

Nov 6 2018

Dear Ms. Rowe,

I'm writing to submit a public comment regarding the proposed liquid natural gas project in South West Philadelphia currently under review. The testimony from environmental engineers before the commission claims little to no environmental impact of this project. However this environmental review fails to look beyond the immediate impacts of the project. The gas to be liquified at this plant, is extracted somewhere, and will be consumed somewhere. Likely the gas was extracted through hydraulic fracturing, a process which is well known to taint groundwater, release air pollutants and to destabilize the earth leading to increasingly more destructive and dangerous earthquakes. Not to mention, that fracking, as with all extractive industries, will be economically damaging in the long run to the communities that might currently be benefiting from it. After liquification and transportation and so on, when this gas is eventually consumed, it will release pollutants into the air, contributing to global climate change, and devastating communities across the globe. I won't expound further on the negative impacts of climate change because it is well established that climate change will cause immeasurable damage to human kind (See the IPCC report "Global Warming of 1.5C"). A true environmental analysis of this liquid natural gas project would take all of the negative impacts of fracking and climate change into consideration, and I believe it would find that this project is much too costly for the environment, and for humanity to go forward.

Thank you,  
Alana Tartaro, Philadelphia PA

Nov 13 2018

Dear Ms. Rowe,

I write to ask that you and the Philadelphia Gas Commission consider the environmental and health impacts of the Passyunk Energy Center on the residents of Philadelphia. This is a project that perpetuates Philadelphia's dependence on fossil fuels and will worsen the climate crisis.

Best,  
Audrey Kriva  
Philadelphia Resident

Nov 13 2018

Good afternoon,

I am writing in regards to the Philadelphia Gas Works proposal for a new liquefied natural gas facility at the Passyunk plant. I work in Southwest Philadelphia and am strongly opposed to this plan. Southwest Philadelphia has just 1% tree coverage, as well as many vacant and contaminated industrial sites. Together these factors contribute to a multitude of health issues such as heightened violence, decreased physical activity, high rates of obesity and preventable diseases, and limited healthy food choices within walkable distance. This new plant would contribute to these problems by adding more fossil fuel infrastructure and increasing air pollution in Southwest. Our city should be supporting the health of all of our communities and the health of our planet by investing in renewable energy sources.

Kind regards,  
Julie Mansfield

Nov 15 2018

I live and work in the Southwest community. I spend most of my earnings at local businesses. I very rarely travel outside of my neighborhood after long work days. I shouldn't have to live in fear that the air I am breathing may take away years from my life. I am reluctant to start a family here due to the public health concerns in my area. Do you consider these things before making these kinds of decisions? Where do you live? Would you want a liquefied natural gas facility in your area polluting not only the air you breath but also the air of your neighbors and loved ones? Please reconsider. Thank you.

Sophia Poe

Nov 16 2018

Good morning,

I would like to submit a comment regarding PGW's Petition to the Philadelphia Gas Commission for Approval and Recommendation for Approval of Certain Transactions and Contracts for the Purchase, Storage, Distribution and/or Transmission of Natural and Other Gas, and Also Certain Transactions and Contracts Respecting Real Property Owned by the City of Philadelphia and Operated by the Philadelphia Gas Works.

I work in the Southwest Philadelphia community. There is a very long history of this neighborhood suffering under the pollution of industrialization, going back more than 100 years. Do we really need to continue a trend of polluting this neighborhood? I oppose PGW's petition because this neighborhood is already suffering from air pollution with high asthma rates. This community and the larger Philadelphia community deserve more, we deserve transparency and well thought out green energy infrastructure. The Schuylkill River is just now reaching low enough pollution levels to be used for recreation, I hope that we can continue to improve the water and air quality of Philadelphia for future generations.

Sincerely,

Miriam Klingler

Concerned Southwest worker and Southeast resident

Nov 25 2018

Dear Anne,

I am one of thousands of City residents who oppose the Passyunk Energy Center.

I see no reason why we should support this project.

First, we need to withdraw from fossil fuels in order to postpone the dire effects of climate change, including more droughts, flooding, forest fires which affect our food supply, the air we breathe and the increase in diseases. THINK OF THE FUTURE.

Second, this would not be profitable for the city, despite pie-in-the-sky prophesies.

Third, it would cause pollution in a congested part of the city, increasing asthma and heart problems.

Is someone profiting from this project, I ask, for I can think of no other reason to proceed?

Dr. Sandra Folzer

Nov 25 2018

To whom it may concern,

I am a resident of (south)west Philly that frequents the area for recreation. I find it appalling that this proposal was considered for implementation considering the already distressing industrial effects on the continuously disenfranchised residential population, as well as the greater context of impending/currently occurring climate crisis. Whether you scale in locally or globally, continuing to invest in fossil fuel infrastructure is irrational. I write to you to express my adamant opposition to this project.

Thank you,  
Sara Ozawa  
Haverford College

Nov 28 2018

To Anna Rowe and the PHL Gas Commission,

I am writing to express my concern about PGW's proposal for a new liquified natural gas facilitating at the Passyunk plant.

The refinery in beleaguered Southwest Philadelphia is the largest on the eastern seaboard, and the largest industrial source of toxic air pollution in Philadelphia. The asthma rate of people in this neighborhood are already extremely high. [A recent report](#) has named Philadelphia has recently been ranked #4 "asthma capital" in the nation. Why would we want to increase the environmental hazard to our communities and our environment like that?

Please reconsider this plan to expand the production and use of fossil fuels when we are running out of time to address the climate crisis we face, as Philadelphians, and as the responsible global citizens that we aspire to be here in the city of brotherly love!

Sincerely,

Janice Lion, Philadelphia, PA 19119

Nov 28 2018

Public Comment on PGW's Petition to the Philadelphia Gas Commission for Approval and Recommendation for Approval of Certain Transactions and Contracts for the Purchase, Storage, Distribution and/or Transmission of Natural and Other Gas

Public comment by Coryn Wolk  
researcher & writer for [Physicians for Social Responsibility Philadelphia PA](#) & [EDGE Philly](#)

While my concerns about this project are broad, I am focusing my comments on the environmental aspects of this proposal.

I thoroughly read Langan's Environmental Review for this project and found many sections that lacked adequate details or dismissed potential concerns without adequate justification.

For context, the PGW Passyunk Plant has had gas-related operations and infrastructure since at least the 1850s. The first large gas holder was built on the site in the early 1850s, the precursor to the cage there now. Phillygeohistory.org's historical map overlays show the progression of different infrastructure on-site over the years. For much of its history, gas was produced by coal gasification, an intensely dirty process. Infrastructure on-site included coal storage, coal coke sheds, "purifying houses," and railroad tracks. The site has also been surrounded by petroleum and chemical infrastructure since that time. Contamination from these operations is a contemporary concern—EPA Region III and Pennsylvania DEP are still addressing vapor intrusion and contaminated groundwater migration in the residential neighborhood directly adjacent to the PGW site. Details on that work are here:

- [https://response.epa.gov/site/site\\_profile.aspx?site\\_id=8789](https://response.epa.gov/site/site_profile.aspx?site_id=8789)
- <https://silarservices.com/wp-content/uploads/2018/05/Air-Sparge-Soil-Vapor-Extraction-Design.pdf>

For the rest of my comments, I will go by section.

## **Air Emissions**

The centerpiece of this project is the LNG liquefaction infrastructure. However, this infrastructure is only mentioned on page 2 of the Environmental Review, which lists "a natural gas liquefaction system (including a gas meter/regulating system, a gas pre-treatment system and a Motor Control Center (MCC)/Distributed Control Building);" a "new 10 MMSCFD nitrogen expansion liquefier (120,000 gallons LNG/day production)," which includes a 5,968-kw compressor, fin fans, a heater, and auxiliary equipment; and a new truck loading system. On Page 6, under "Proposed Facility Changes," the only stationary source changes listed are the new heater mentioned above and increased use of existing boilers for LNG vaporization. On page 7, Langan doubles down in their erasure of the liquefaction equipment, stating "The natural gas-fired heater is the only new stationary source of emissions that is proposed" and claiming that because they are electrically-driven, the rest of the 10 MMSCFD liquefier's equipment will emit zero air pollutants. On fugitive emissions alone, this seems unlikely, but there is no data here to weigh.

On page 4, Langan correctly notes that the threshold for a federal Title V air permit license is 25 tons of VOCs or NOx per year in Philadelphia because of its nonattainment status for ground-level ozone. However, after page 4, Langan drops all references to VOCs and only includes NOx in its analysis and

charts. VOC emissions are a primary pollutant of concern in natural gas operations. Without any mention of them, it's impossible to tell whether Langan is correct in stating that the Plant will continue to operate below Title V thresholds.

In contrast, Langan goes to great lengths to dismiss the emissions it does acknowledge. On page 9, Langan says that the liquefier could “displace” a large quantity of diesel-fuel equivalent, or 6 tons of NOx from the refineries that produce diesel fuel, or 46,000 diesel pickup trucks or SUVs that produce even more NOx. It is unclear what NOx emissions from SUVs have to do with an LNG liquefier.

Langan also states on page 9 that the project has applied for a PRACP grant to “finance the installation of renewable energy electricity generation for the new liquefaction plant, which would further reduce plant emissions.” But the emissions from electricity generation are not factored into its earlier analysis—how can the project take credit for anticipating reducing emissions that it denies exist?

### **Water, Wastewater, and Stormwater**

- An onsite treatment system is mentioned on page 9. What is the capacity of that system, and are there any risks of exceeding its capacity during construction or from the increase in impervious area?
- The Passyunk Plant has an internal sanitary system that connects to the Passyunk Ave sewer line and an “independent stormwater sewer system” that drains towards an outfall on the Schuylkill River. Does stormwater and groundwater pass through the treatment system before entering either of these, or only one?
- Langan asserts that new stormwater management practices will result in less runoff entering the city sewer system despite the increase in impervious area. What about the independent stormwater system?

### **Hazardous and Residual Waste**

Again, Langan skirts details or analysis of the most obvious concerns: the existing contamination of the site's soil and groundwater is relegated to one paragraph on page 14. The two sentences: “During the construction process, PGW may encounter hazardous soil and wastewater due to the site's historic use as a manufactured gas plant. Per PGW's operational procedures, chemical sampling and analysis will be performed and a soil management plan will be developed for construction activities and residual or hazardous waste disposal, as needed.” Furthermore, on page 16, Langan actually uses the site's industrial history to assert that the site has “no natural resources within the property boundary.”

### **Conclusion**

The tight lines Langan draws around its analysis do not reflect physical or consequential reality. This project's construction involves disturbing heavily contaminated soil and groundwater on a site adjacent to the Schuylkill River and residential neighborhoods already heavily overburdened with air pollution. Once operational, this project involves a significant increase in natural gas infrastructure and transportation by pipeline and truck, with potential additional increases in the future. The air pollution and risks from natural gas operations are well-documented elsewhere, but Langan barely details why they believe that pollution will not occur here.

In the almost 120 years since gas works began on the site, Philadelphia has begun to realize the impacts of air pollution and the world has been given a critical deadline to address our dependence on fuels such as natural gas. Yet PGW and the Philadelphia Gas Commission seem intent to remain in the 1800s, holding a confusing, rushed approval process that by design or indifference excludes public involvement, and stirring up almost 120 years of contaminated soil to build more archaic, climate-destructive infrastructure.

Coryn Wolk | [coryn.wolk@gmail.com](mailto:coryn.wolk@gmail.com)