

Date: October 2, 2016

Subject: Archbald Energy Partners LLC

Permit No.: 35-00070A

Public Comment Period

Archbald, PA

To: Mr. Mark J Wejksznar, P.E.

Program Manager

Pennsylvania Department of Environmental Protection

Northeast Regional Office

Bureau of Air Quality

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From: John S. Mellow

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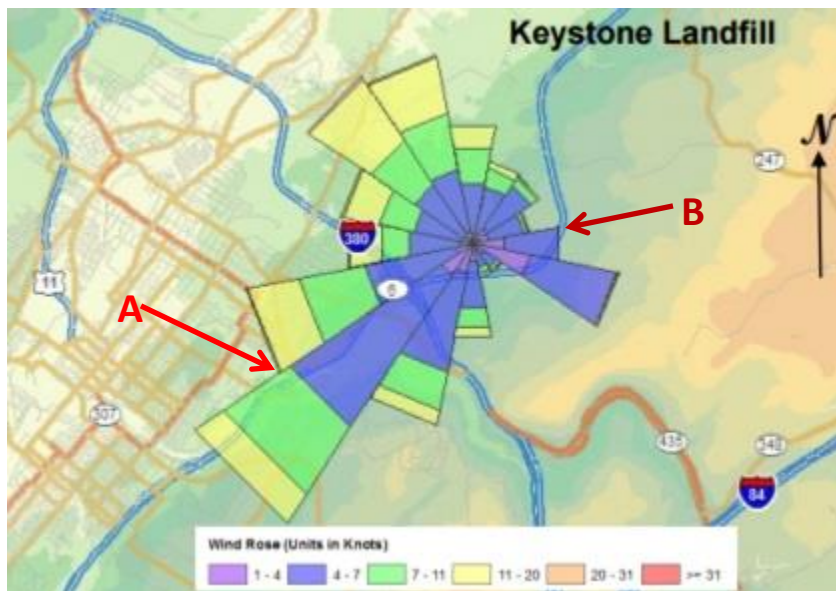
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This document is submitted to update the concerns addressed in this writer's submittal dated September 30, 2016. The objective is to clarify Comment 3 regarding "site specific background" monitoring. The comment does not change but it seems worthwhile to provide information on the evaluation of a "wind rose" diagram particularly to anyone reading this but not used to evaluating meteorological data. The second issue is on Comment 8 regarding "job creation". Again, this additional information that corrects part of this comment does not change the general concern. There has not been any additional information provided on the UGI pipeline issue with respect to basic information on delivery to the Archbald/Jessup area with the Triad Expansion program. Overall, the basic information on the UGI section of pipeline is as elusive as Donald Trump's income tax returns.

Comment 3 Additional Clarification: The original section on "site specific background" monitoring for air is provided with regard to the Department of Health wind rose diagram.

"Note that for air there may be an expectation of large air masses moving generally in a west to east direction. This would imply that most of the emissions from the Jessup and Archbald facilities to move generally to the east and opposite of the more highly populated areas. However, localized air flow patterns can move emissions in various directions. This was seen in the very detailed monitoring scenario for the Keystone Landfill Health Consultationⁱ in progress. In fact, the wind rose diagram that graphically depicts wind direction and velocity showed most measurements towards

the generally more highly developed areas to the west and south. This would be the closest (about three miles away) wind data that this writer is aware of and demonstrates the need for adequate local site specific background monitoring of all potential contaminants in the air and water. The Department of Health (October 2015 Update) is provided for visualization of general air trends during the monitoring periods. It would seem technically logical to do pre-operational air monitoring with parameters of concern (that may be above the normal PADEP list) with wind vector data."



Source: Pennsylvania Department of Health

This comment may be misleading if the wind rose is visualized in an incorrect way. The length of the vector sections are the frequency of the wind directions during the monitoring period. However, the direction uses conventional meteorological logic in direction “from” rather than “to”. The evaluation of this writer that the “majority” of the observations was towards the more developed residential areas was not correct although the point of using this diagram does show significant time periods with wind direction towards the residential areas. The red arrows are provided for clarity on this statement error. The arrow labeled A shows wind vectors “from” the southwest or towards the general anticipated general wind direction of west to east. The arrow labelled B shows wind vectors from the east and northeast towards the more densely developed residential areas. Again, the frequency (amount of time) is measured by the vector length and wind direction is in direction of the apex of the point at the origin. The original objective is to point out localized wind variations and utilizing monitors in the vicinity of the sites of interest.

Comment 8 Additional Information: Additional information from a Right to Know request from Jessup Borough was received after submitting my original comments. While this does not change any of the concerns on “job creation” it does seem to clarify the large amount of trailers on the site shown on Attachment Four. This concern may still be of concern although total resolution should be sometime during the week of October 2, 2016. However, information on permits from the RTK request and

conversation with the Jessup Borough zoning officer seems to indicate these particular trailers may not be associated with the alleged Invenergy request for permits for temporary housing. The original comment regarding the trailers is provided:

“While local paving contractors and other local businesses are retained it appears that many of the construction workers are from out of state and Dewitt contractors. This is difficult to verify as the staging area on a formerly public road is off limits for public traffic for the approximate two years of construction. Invenergy was allegedly requested Jessup Borough approval for one-hundred on-site trailers. While this has not been verified at the time of this submission, there does appear to be a significant amount of trailers on-site (see Attachment Four) that are not part of the office trailers for DeWitt and Invenergy.”

The permit information for July through September appears to indicate that these are not housing units although there still may need to be additional inspections to verify the purpose of these units. The summarized permit informationⁱⁱ from Jessup Borough is provided:

Lackawanna Energy Center Permits for July and August 2016

16-72	LEC LLC 1000 Sunnyside Road	Kiewit	Temporary Maintenance Shop	\$ 50,300.00	\$ 1,558.60
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Lackawanna Energy Center Permits for September 2016

16-73 B	LEC LLC 1000 Sunnyside Road	Kiewit	Foundation	\$ 239,000.00	\$ 4,356.18
16-74 B	LEC LLC 1000 Sunnyside Road	Kiewit	Foundations	\$ 328,420.00	\$ 5,965.56
16-76 BEMP	LEC LLC 1000 Sunnyside Road	Kiewit	New Building- Water treatment Bld & Lab	\$ 1,066,200.00	\$ 6,206.36
16-77 BEMP	LEC LLC 1000 Sunnyside Road	Kiewit	New Building- Admin Office & Warehouse	\$ 2,047,000.00	\$ 13,485.57
16-80 E	LEC LLC 1000 Sunnyside Road	Kiewit	Temporary Power Drop	\$ 23,000.00	\$ 468.00

Again, it is this writer’s opinion that “job creation” would not likely be part of the consideration in the permit review. However, from past experiences it seems that comments from interest groups do promote this issue with the PADEP although the reality of temporary and permanent jobs for the local community is questionable in the industry, political, and union public relations.

ⁱ Pennsylvania Department of Health; Keystone Landfill, Lackawanna County Community Update, October 2015, [http://files.dep.state.pa.us/RegionalResources/NERO/NEROPortalFiles/PADOH-Keystone%20Landfill%20Health%20Assessment%20Update%20\(October%202015\).pdf](http://files.dep.state.pa.us/RegionalResources/NERO/NEROPortalFiles/PADOH-Keystone%20Landfill%20Health%20Assessment%20Update%20(October%202015).pdf)

ⁱⁱ Email Jessup Borough to John Mellow; Right to Know Response, September 30, 2016.