



Energy Transfer Marketing & Terminals, LP (ETMT), Marcus Hook, PA
Air Quality Plan Approval No. 23-0119K
Verbal Testimony

Tracy Carluccio, Deputy Director, Delaware Riverkeeper Network

I am testifying today in opposition to the approval of the proposed air quality plan on behalf of DRN's more than 26,000 members, many of whom live and/or work in this region. We will be submitting written comment.

First and of the highest priority, Marcus Hook and the areas adjacent are already overburdened with pollution from this Terminal and other facilities. There is simply no way to justify any additional air pollution. And there's another problem - DEP states it is following its EJ Enhanced Public Participation Policy¹ here.² But there are public involvement actions in this policy that must be done before any permitting or public hearings. Not only is the Marcus Hook community an area of concern, according to the PennEnviroScreen, but this would be a "Trigger Project" as well, adding more requirements. In short, this hearing is premature, the announced intention of DEP to approve the permit is premature and if DEP moves ahead, this project will be in violation of its EJ Enhanced PPP.

Dangerous air pollutants from this expansion such as nitrogen dioxide, volatile organic compounds, and Particulate Matter 2.5 (PM2.5) will harm the health of residents, will negatively impact peoples' lungs and heart, will impair neurological development, and will increase smog and ozone, and the region currently doesn't even meet federal air quality standards for ozone and PM2.5. And as far as water quality, Delaware County has the most polluted streams in all of Pennsylvania. That is another significant measure of the high levels of pollution that the communities in the County experience.

DRN is also opposed to this approval because there is no disclosure of the full footprint of this chiller expansion. A comprehensive understanding of all the pieces of this project is essential to assess its potential effects on the communities and the environment. Where will the ethane come from? What is it for, how will it be used or marketed? Will exports expand? For instance, there is a Special Permit request before USDOT to transport ethane by railcar into Marcus Hook – is this how it will get here? Ethane by rail is currently banned to protect public safety and transporting ethane in rail cars would expand the danger and threaten Delaware County and other

¹ <https://www.dep.pa.gov/PublicParticipation/OfficeofEnvironmentalJustice/Pages/DEP-Enhanced-Public-Participation-Policy.aspx>

² <https://www.ahs.dep.pa.gov/NewsRoomPublic/articleviewer.aspx?id=22341&typeid=1>

Pennsylvania communities, impacting even more regions. Will the pipelines need to expand to get it here? This will expand the impacts all long the pipeline route. We also know that ethane is a refrigerant used to freeze natural gas into liquid methane or LNG. Is this really what it's for? DEP must let the public in on the full implications of this expansion. Energy Transfer isn't going to do that. Otherwise, we are left in the dark once again and without the facts needed to meaningfully participate in DEP's decisions that so directly impact everyone here and beyond and the environment of Pennsylvania's and the Delaware River.

Finally, DRN is also opposed to increasing the amount of ethane that is handled here. Ethane is extremely flammable and potentially explosive. If it escapes into the air, it can kill. There are no benefits, only burdensome costs to the public and the environment and that is completely unacceptable. This permit must be denied.

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