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**From:** Phil Cianciotto <pcdrc@frontiernet.net>  
**To:** <r8dep@gw.dec.state.ny.us>  
**Date:** 11/29/2010 9:30 AM  
**Subject:** Finger Lakes Petroleum Gas (LPG) Underground Storage Facility

Dear Mr. Bimber

I am President of Seneca Lake Pure Waters Association and our organization wants to learn more about the proposed facility and the implications the facility may have on our watershed and lake. We are concerned about the stability of the caverns where the gas is proposed to be stored, the possibility of leaks into the lake/environment and the potential for catastrophic failure of the brine containment pond and the uncontrolled release of 88.3 million gallons of brine might have on the watershed and lake. Could you let me know about the process to be used for public input and the timing of hearings regarding this project?

Phil Cianciotto,  
Pres. SLPWA,

#### Positive Declaration

Schuyler County - The New York State Department of Environmental Conservation (NYS DEC), as lead agency, has determined that the proposed Finger Lakes Liquefied Petroleum Gas (LPG) Underground Storage Facility may have a significant adverse impact on the environment and a Draft Environmental Impact Statement must be prepared. The action involves a proposal by Finger Lakes LPG Storage, LLC to construct and operate a new underground LPG storage facility for the storage and distribution of propane and butane on a portion of a 576 acre site. The storage facility will utilize existing caverns in the Syracuse salt formation created by US Salt and its predecessors' salt production operations. As proposed, a maximum of 2.10 million barrels (88.20 million gallons) of LPG will be stored in these caverns seasonally, displacing some of the brine currently filling them, and will be withdrawn by displacement of propane by brine when demand occurs during the heating season and displacement of butane by brine during the gasoline blending season. During storage operations, the brine displaced by LPG will be stored and contained in a 14 acre lined surface impoundment with a capacity of 2.19 million barrels (91.98 million gallons) on the hillside immediately east of the junction of Routes 14 and 14A. The facility will connect to the existing Teppco LPG interstate pipeline, and will ship LPG by truck via NYS Routes 14/14A and rail to the existing Norfolk & Southern Railroad. As proposed, the project involves construction of a new rail and truck LPG transfer facility, consisting of a 6 rail siding capable of allowing loading/unloading of 24 rail cars within 12 hours, and a truck loading station capable of loading 4 trucks per hour. The rail/truck loading facility is capable of being operated on a 24 hour basis 365 days a year. Construction will also include surface works consisting of truck and rail loading terminals, LPG storage tanks, offices and other distribution facilities, and stormwater control structures. The project is located on NYS Routes 14 and 14A west of Seneca Lake in the Town of Reading, New York.

Contact: David L Bimber, NYS DEC - Region 8 Office, 6274 East Avon-Lima Road, Avon, NY 14414,  
Phone: (585) 226-5401, E-mail: r8dep@gw.dec.state.ny.us .

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**From:** Phil Cianciotto <pcdrc@frontiernet.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/27/2011 8:43 PM  
**Subject:** SLPWA Comments on DSEIS Scoping Outline Finger Lakes LPG Storage Facility 1-27-11  
**Attachments:** SLPWA Comments on LPG DSEIS 1-27-11.pdf

To: David Bimber, Deputy Regional Permit Administrator

Address: NYSDEC - 6274 East Avon-Lima Road, Avon New York 14414

Telephone Number: 585-226-5401

E-mail: dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber

Attached please find comments made by Seneca Lake Pure Waters Association on the DSEIS Draft Scoping Outline for the Finger Lakes LPG Storage Facility in Watkins Glen. We look forward to working with you to ensure that the water quality of Seneca Lake and its watershed is preserved. If you are maintaining a mailing list of individuals and organization interested in this proposal, please use the email addresses listed below for myself and our organization. If you are interested in additional information regarding Seneca Lake Pure Waters Association, our website can be found at [www.senecalake.org](http://www.senecalake.org).

Sincerely,

Phil Cianciotto,

Pres. Seneca Lake Pure Waters Association

[slpwa@senecalake.org](mailto:slpwa@senecalake.org)

[pcdrc@frontiernet.net](mailto:pcdrc@frontiernet.net)

Seneca Lake Pure Waters Association welcomes the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) Draft Scoping Outline for the Finger Lakes LPG Storage LLC Watkins Glen LPG Storage Facility DEC 8-4432-00085/00001 issued January 5, 2011. Our association represents over 300 member residents within the Seneca Lake Watershed.

We have reviewed the draft scoping document and find that the scope is limiting in one area of major concern to us. We believe the proposed scoping document fails to adequately address the unique geology of the Seneca Lake basin and the potential intrusion of that basin into the Syracuse Formation of Shale/Rock Salt as suggested by Wing et al. in their 1995 publication<sup>1</sup> and substantiated by Halfman et al., in their 2006 paper<sup>5</sup>.

Wing et al. reported that chloride concentrations in Seneca Lake are 5 to 6 times higher than all other Finger Lakes and about twice the levels reported for Cayuga Lake which has chloride concentrations 2-3 times higher than the other Finger Lakes. They argue that source of the salts is the underlying salt beds, and the flow of salty brines from the bedrock into the lake. Seneca and to a lesser degree Cayuga Lake are the only Finger Lakes impacted by the underlying salts due to the great depth of both basins. Our concern is that the dissolution of salt into the lake suggests potential pathways to the proposed salt cavern storage areas. It is our belief that to fully understand the geological suitability of the existing salt caverns for the safe storage of LPG, the DSEIS needs to go beyond "borrowing from publicly available information submitted in connection with the underground storage permit application and site specific information". The unique geology of the Seneca Lake basin which intersects with the Syracuse Salt Formation requires a more detailed study to understand the potential for catastrophic failure of the proposed gas storage caverns such as occurred in Livingston County in 1994<sup>2</sup> due to the incursion of groundwater. A similar occurrence due to lake water in the proposed LPG storage facility could result in a massive environmental release of the stored LPG and brine into the Seneca Lake the water supplies that depend on it and its atmosphere.

In addition to the pioneering work by Wing, et al., three other research groups<sup>3, 4, 5</sup> concluded that further geological testing and scientific investigative work is needed to understand the geology of the Seneca Lake basin and the long-term impact of natural occurring salt intrusion on the lake and surrounding salt beds. These studies suggest that the long-term stability of the proposed LPG storage in these salt caverns may pose a very high risk to the air and water environment of Seneca Lake.

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<sup>1</sup> Michael R. Wing, Amy Preston, Nadine Acquisto and William Ahrensbrak, *Intrusion of saline groundwater into Seneca and Cayuga Lakes*, New York, Limnology and Oceanography, Vol. 40, No. 4 (Jun., 1995), pp. 791-801, Geosciences Department, Hobart and William Smith Colleges, Geneva New York 14456. <http://www.jstor.org/pss/2838313>

<sup>2</sup> Richard M. Vager, Todd S. Miller, and William M. Kappel, *Simulated Effects of 1994 Salt-Mine Collapse on Groundwater Flow and Land Subsidence in a Glacial Aquifer System*, Livingston County, New York, USGS Professional Publication 1611.

<sup>3</sup> Henry T. Mullins and Edward J. Hinchey, *Erosion and infill of New York Finger Lakes: Implications of Laurentide Ice Sheet Deglaciation*, Geology, Vol 17, pg 622-625, 1989. <http://geology.gsapubs.org/content/17/7/622.abstract>

<sup>4</sup> Henry T. Mullins, Edward J. Hinchey, Robert W. Wellner, David B. Stephens, William T. Anderson, Thomas R. Dwyer and Albert C. Hine, *Seismic Stratigraphy of the Finger Lakes: A Continental Record of Heinrich Event H-1 and Laurentide Ice Sheet Instability*, Geological Society of America, Special Paper 311, 1996. <http://specialpapers.gsapubs.org/content/311/1.abstract>

<sup>5</sup> John D. Halfman, Caterina M. Caiazza, Robert J. Stewart, Suzanne M. Opalka and Clare K. Morgan, *Major Ion Hydrogeochemical Budgets and Elevated Chloride Concentrations in Seneca Lake, New York*, Northeastern Geology & Environmental Sciences, Vol. 28, No.4, 2006 p. 324-333. <http://people.hws.edu/halfman/Data/Reprints/SenecalonsReprint.pdf>

Finally, recently compiled historical chloride data spanning back to the 1990s for Seneca Lake reveal low chloride concentrations (~30 ppm) in the early 1990s, increasing to the highest chloride concentrations in the 1960s and 1970s (~160 ppm), and slowing decreasing to modern day concentrations (~120 ppm)<sup>6,7</sup>. We wonder if the century scale rise and decline, changes that mimics mining activities in the watershed, suggest that solution mining hydrostatic pressures influenced the groundwater discharge of the brines into the lake.

Seneca Lake Pure Waters Association strongly recommends that the DSEIS Scoping Outline include a geological assessment and additional testing based on an intrusion of salt into Seneca Lake from these salt mines to assure that the proposed facility can be used safely for the long term storage of LPG.

<sup>6</sup> Glenn Jolly, Seneca Lake, Water Residence time and chloride concentrations. 2006. 2nd Annual Finger Lakes Research Conference Abstract Volume. October 14, 2006, Finger Lakes Institute, Hobart and William Smith Colleges, Geneva, NY.

<sup>7</sup> Glenn Jolly, Chloride diffusion into Cayuga Lake. 2005. 1st Annual Finger Lakes Research Conference Abstract Volume. October 8, 2005, Finger Lakes Institute, Hobart and William Smith Colleges, Geneva, NY.

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**From:** "Justin S. Miller" <jmiller@HarrisBeach.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** "Kelsey" <kelsey@scoped.biz>, <kmwgl@localnet.com>  
**Date:** 1/10/2011 12:27 PM  
**Subject:** FW: Finger Lakes LPG Storage (DEC 8-4432-00085/00001) Schuyler County IDA  
**Attachments:** FingerLakesLPGScopeNotice.pdf; FingerLakesLPGScope.pdf

Mr. Bimber:

We represent the Schuyler County Industrial Development Agency, which has for some time has been an "Involved Agency" under SEQRA for the captioned project. The attached scoping materials were just forwarded to my attention. As a courtesy, could you please copy me on all Involved Agency SEQRA notices and communications for this project? In addition, please be sure to copy SCIDA directly as well attn: J. Kelsey Jones, Executive Director, Schuyler County industrial Development Agency, 2 N. Franklin Street, Watkins Glen, New York 14891.

Thanks

Justin S. Miller  
 Partner

HARRIS BEACH PLLC  
 ATTORNEYS AT LAW  
 677 Broadway, Suite 1101  
 Albany, NY 12207  
 518.701.2710 Direct  
 518.427.0235 Fax  
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 vCard  
 <<http://www.harrisbeach.com/vcard/Justin%20S.%20Miller,%20Esq..vcf>>

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**From:** Alice Bartholomew <a iw777@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/12/2011 2:26 AM  
**Subject:** Comments on EIS for LPG in Watkins Salt Caverns

My comment on the proposed scope of the DEC's environmental impact statement for Inergy's plan to store liquid propane and butane in the salt caverns just north of Watkins Glen.

Important questions that need to be addressed for Watkins Glen and Seneca Lake, include:

1/ Are these caverns geologically suitable for storing hazardous materials?

2/ What safety precautions are in place for the giant brine pond that's planned on a hill above Seneca Lake (at grades ranging from 8 to 12 percent, according to the DEC)?

3/ Given that this project would rely on repeated back-and-forth transfers of brine between the salt caverns and the brine pond, what are the risks of spills and accidents that would effect Seneca Lake? What safety measures are planned?

4/ How will the dramatic increase in truck traffic effect Watkins Glen?

5/ Who will pay for road damage caused by the heavy truck traffic?

Thank you.

Alice Bartholomew  
415 Wall Street  
Elmira, NY 14905

**From:** Charles Roth <oakmeadowfarms@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/13/2011 7:56 PM  
**Subject:** Finger lakes LPG update

Dear Mr. Bimber,

I am the owner and operator of Oak Meadow Farms in Reading Center New York. I have just been made aware of the Finger lakes LPG projects scope. Would you please update me on where the DSEIS stands.

Thank You  
Sincerely,  
Charles J. Roth  
Oak Meadow Farms

oakmeadowfarms@yahoo.com

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**David Bimber - Questions regarding Draft Scoping Outline for Finger Lakes LPG Storage LLC**

**From:** Rachel Treichler <treichlerlaw@frontiernet.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/14/2011 1:53 PM  
**Subject:** Questions regarding Draft Scoping Outline for Finger Lakes LPG Storage LLC

Dear Mr. Bimber,

I am reviewing the Draft Scoping Outline for Finger Lakes LPG Storage LLC's Watkins Glen LPG Storage Facility, and I have several questions.

I see no description in the Draft Scoping Outline of the proposed location of the proposed underground storage facility. Also, I see no description of the proposed location of the proposed brine pond. Has the company presented proposed locations for these two components of the project? Are there maps which show the proposed locations?

Is the EIS review the result of a permit application by Finger Lakes LPG Storage LLC? If so, what permit or permits have been applied for?

Thank you for your kind consideration and assistance.

Very truly yours,

Rachel Treichler  
7988 Van Amburg Road  
Hammondsport, NY 14840  
607-569-2114  
<http://treichlerlawoffice.com/>  
[treichlerlaw@frontiernet.net](mailto:treichlerlaw@frontiernet.net)

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**From:** Ruth Benedict <benedict.ruth86@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/16/2011 11:04 AM  
**Subject:** Storage of liquified petroleum gas

Dear Mr. Bimber,

I am writing to voice my \*extreme concern\* over the possibility of storing liquified petroleum gas in the salt mining caverns of U.S. Salt and Cargill. Once again I am struck by the absurdity and extreme folly of implementing such a practice in a region which is known for its fragile and valuable natural environment, i.e. Seneca Lake and the Finger Lakes Region. Like hydrofracking, this seems like an idea we will deeply regret once implemented. It does not make sense. It is too risky.

We must own up to the facts of modern life: If we need to store potentially dangerous substances, we must do so in areas/containers that are not in direct contact with precious resources like fresh water.

I strongly object to this idea.

Ruth Benedict  
169 E. Leach Road  
Penn Yan, NY 14527  
(315) 531-9092

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**From:** Cecile A Lawrence <clawren1@binghamton.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/17/2011 11:15 AM  
**Subject:** Scoping Document for LPG Underground Storage near Seneca Lake

At the NYS DEC website I could not find how to turn in a comment on this document. So I send to you to turn in for me, please.

My position is that this proposal is way too dangerous and unacceptable on many fronts. Therefore, not only should a Positive Declaration be made for this site, but any similar proposal to store LPG underground in any similar site anywhere in the state should be denied in its entirety, in addition to this proposal being denied in its entirety on the basis of the following reasons at least:

There is an unacceptable:

- potential for catastrophic structural failure of the surface impoundment.
- potential for subsidence associated with underground storage operations.
- potential for surface water contamination in the event of an impoundment structure failure due to its proximity to Seneca Lake.
- potential for ground water contamination in the event of impoundment structure leakage, subsidence, or loss of cavern integrity.
- amount of additional road and rail traffic.
- potential truck traffic impacts to SR 14 & 14A.
- additional train traffic over Watkins Glen Gorge bridge.
- operation of a new rail and truck loading facility in a sparsely developed rural area. where none currently exist. People are running out of places from which to escape the stress of the cacaphony, toxic diesel fumes, dust, vibrations, industrialization. This is causing numerous synergistic deleterious impacts on the health of humans and all life.
- visual and cumulative environmental impact of a new rail and truck loading facility, brine pond.
- visual impact, noise, lights, vibrations (vibroacoustic disease) compressor building. Many animals communicate via sound and vibration. By facilitating the construction of equipment that can cause VBD, we are creating harm to the environment.

Cecile Lawrence, Ph.D., J.D.

14 Alpine Drive, Apalachin, NY

607-625-5844

8

**From:** <pgamba1007@aol.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/16/2011 9:53 PM  
**Subject:** Finger Lakes LPG Storage

Mir Bimber,

My name is Peter Gamba. I live in Branchport in Yates county. The Storage of LPG in old underground wells in the finger lakes is a threat to the environment, our finger lakes water, the wine and ag business and the livability of the community .

As a resident of the finger lakes and a member of the "committee to preserve the finger lakes" I am against this type of industrial business.

Peter Gamba

Branchport NY  
315 595 8899

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**From:** "Michael Swasta" <mswasta@stny.rr.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/18/2011 8:24 AM  
**Subject:** DEC 8-4432-00085/00001 - Finger Lakes LPG Underground Storage Facility

Finger Lakes LPG Storage LLC

Watkins Glen LPG Storage Facility

DEC 8-4432-00085/00001

January 18, 2011

Dear Mr. Bimber,

Does DEC have a Site Location Plan and a Facility Site Plan for the proposed LPG Storage Facility? Are these plans available for review in either (a) pdf form for emailing, (b) website accessible on a DEC website or a website provided by the facility design engineer, or (c) by appointment at the DEC Regional Office in Avon, NY? Review of these plans would help to foster a better understanding of the proposed facility, as follows:

Site Location Plan

- § Facility location in relation to the Seneca Lake shoreline
- § Location of facility in relation to the existing US Salt Plant on Salt Point Road
- § Facility location in relation to Routes 14 and 14A
- § Primary access road(s) to the facility
- § Rail access to the facility
- § Pipeline access to the facility

Facility Site Plan showing location of key components of the proposed facility

- § Brine pond size (footprint) and location in relation to the lake shoreline
- § Compressor building
- § Truck loading facility
- § Rail loading facility and rail sidings

§ Above ground LPG storage (if any)

§ Stormwater retention ponds and any significant above ground structures

§ Office and other buildings

Other questions which you may be able to answer include the following:

1. Existing caverns proposed for LPG storage - are these caverns located under Seneca Lake?

2. Are salt caverns of the type proposed for use for LPG storage susceptible to catastrophic failure. Has there ever been a catastrophic failure of a salt cavern in the Finger Lakes Region/Central NYS?

3. Has any sort of construction been started on the site of the proposed facility?

4. Existing US Salt Facility

§ Will any of the proposed facility be located on the lakeshore at the existing US Salt facility located on Salt Point/Salt Pont Road?

§ What are the traffic impacts on Salt Pont Road (if any)?

§ Will a new road or roads be constructed to provide additional access to the existing Salt Point Road facility? Is it reasonable to require construction of a new road to provide separate, direct access to the existing facility?

5. Will stormwater from the proposed (new) truck loading facility, rail loading facility and rail sidings discharge into the lake? Will this stormwater be filtered to remove particulate matter or treated in any other fashion? Are stormwater retention ponds proposed separate from the brine pond?

6. Will the proposed brine pond be covered? In the event of a 100 or 500 year rain storm will the brine pond collect rain/storm water? Will the design of the brine pond eliminate all possibility of the brine pond being over-topped? Are there any existing brine ponds of this size and type (or larger) located in the Finger Lakes Region?

7. Does the design of the brine pond incorporate containment measures in the event of a catastrophic failure of the down slope walls or berms?

Thank you for your assistance.

Best regards,

Mike Swasta

Michael Swasta

411 Watkins Road

Horseheads, NY 14845

Telephone/Fax: 607-739-2948

Email: [mswasta@stny.rr.com](mailto:mswasta@stny.rr.com)

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**Jack & Judith wilbert**

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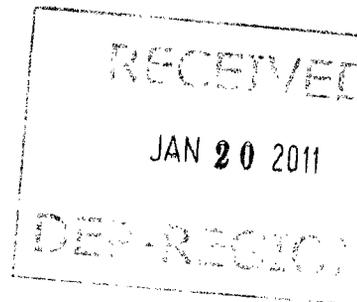
**From:** "Jack & Judith wilbert" <jwwilbert@frontiernet.net>  
**To:** <dlbimber@gw.dec.state.ny.us.>  
**Sent:** Tuesday, January 18, 2011 5:09 PM  
**Subject:** No to LPG storage  
Dear Mr Bimber,

I live between Seneca Lake and Kueka lakes and oil companies contemplating storage of LPG in underground salt caverns, surrounding a deep clean water resource that is a reservoir to thousands is absolutely ludicrous! Why must we the people, continually pay a price to big companies that only think in terms of short term profit and never consider long term impact on health and environment of local people.

Sincerely, Jack W. Wilbert 672 Crystal Valley Rd. Dundee, N.Y. 14837

*Jack W. Wilbert 607-292-6958.*

*Enclosure: ARTICLE published in F.L. Times last Fall.*



October 26, 2010

Dear Editor,

Hydrofracting for natural gas in the Finger Lakes watershed has been delayed until Spring of 2011 when NYS will offer a more environmentally friendly process for drilling in the Marcellus shale; however, what is really needed is a focus on making a quantum leap into renewable fuels and getting independent of fossil fuels.

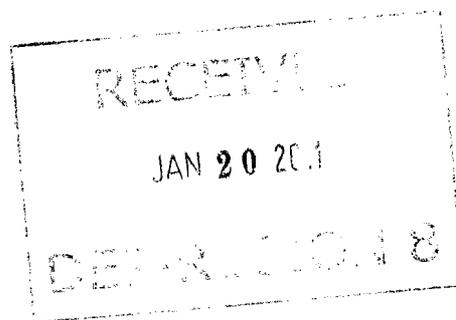
My concern is that politics are focused only on the short term of getting re-elected every two years and does not address critical future issues that will someday bury us. Politics are constantly filled with hate mongering and bickering by both parties and that merely prolongs political gamesmanship and helps big business, big government and Wall Street to continue the ongoing game of the "rich get richer and the poor get poorer" and any real change gets kicked out into the future becoming someones problem someday. Bickering and changing representatives every two years is a great waste of time, energy and money and is not a rational solution to fossil fuels ending by 2050.

We need answers to the deep questions of where are we going as a society and why it has taken decades to get into renewable energy and oil independence; for unless we do some active planning, problem solving and figure out how to work together, we will just be watching Rome burn until the next election. Toffler warned us in Future Shock(1970) of moving into a period of deadly mass irrationalism and we appear to have hit that plateau forty years later. Mass irrationalism in government and big business have long delayed the move to renewable energy. The U.S. was ready to make the move in the early 80's, after the oil crisis in the seventies but was sidetracked by big business and big government who decided to outsource jobs into the global market. The fact is that fossil fuels have peaked and are now on the downslope of supply into higher costs and ultimately into extinction. The easy to reach low hanging fruit in oil and gas drilling have already been picked and our continued use of fossil fuels will require the use of riskier measures of drilling that eventually will endanger our food and water supplies for future survival. The idea of a natural gas transition into renewables simply delays the inevitable and enriches the few in short term only.

We need to focus on getting into long term renewable energy for the next seven generations that follow us. Thirty billion each year is spent on subsidies to big oil with no visible future plan presented for a move into renewable energy. One big oil company now advertises that it is ready to move into renewable energy. Renewable energy can be ready to go right now along with creation of good paying American jobs in manufacturing! Elected officials need to focus beyond two year elections, relearn how to work cooperatively together and take the difficult long focus steps needed to preserve the future of our planet home. We were given the responsibility for the care of the Earth and we need to move our representatives forward into renewables ASAP. We stand on the captains deck of the U.S. Titanic and an iceberg has been sighted in our path.

Sincerely,

Jack W. Wilbert 672 Crystal Valley Rd. Dundee, N. Y. 14837



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**From:** Cheryl Schaefer <yarn@schaeferyarn.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/18/2011 10:47 AM  
**Subject:** storage of gas in salt caverns

I am hoping against hope that the DEC will say no to this outrageous and dangerous proposal.

Cheryl Schaefer  
Schaefer Yarn  
3514 Kelly's Corners Rd  
Interlaken NY 14847  
607-532-9452  
www.schaeferyarn.com  
yarn@schaeferyarn.com

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**From:** "Vinny Aliperti" <vinny@atwatervineyards.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/19/2011 3:21 PM  
**Subject:** LPG/Butane Storage

Dear Mr. Bimber -

We at Atwater Estate Vineyards (just across Seneca Lake from the proposed depot) are absolutely AGAINST the proposed gas storage plan. Not only does hydrofracking have no place in such a ecological sensitive place like the Finger Lakes, but the idea of storing mountains of gas deep underground adjacent to our water supply is ludicrous. Hydrofracking and gas storage in Watkins Glen is way too risky, all one has to do is see the environment disaster unfolding in Pennsylvania to understand how devastating its impact is on the environment and the citizenry.

Thanks for your time.

Vinny Aliperti  
Winemaker  
Atwater Estate Vineyards  
Hector, NY 14841

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**From:** mike harter <mtharter@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/20/2011 11:32 AM  
**Subject:** Salt Cavern Underground Storage

Mr Bimber,

I would caution you to be very careful, in these times, about any mention of underground activities with regard to the oil and gas industry suggested to you by those seeking permits. It is the consistently and constantly verifiable truth, that, despite the best efforts and some successes of engineers, that underground operations are unpredictable and potentially catastrophic to our ecosystems and health. I am new enough to the issue to only be partially aware of it's long history of contamination. I am now aware. I am aware that frackwater has long been dumped, in it's early lower-volume "stimulation" quantities into our waters and sewers. I am aware of storage of radioactive waste, natural gas and petroleum underground and the undoubtable increases in contamination. This is a new situation. These are new times, with new threats and new concentrations. I urge you to show no leeway to the oil and gas industry in underground activities in your jurisdiction. In this particular instance, I urge you to consider the water of Seneca lake, which the engineers cannot promise to protect with any collateral other than their corporation's money, which will not right any wrong they cause.

I say these are new times. Section 322b of the US Energy Policy Act, under Bush/Cheney, deregulates oil and gas from any environmental harm caused from underground injection of chemicals for the purposes of hydraulic fracturing (which you should also take all opportunities to zone against and de-permit, due to the new trend in horizontal slickwater hydrofracking which has been devastating the country on a scale worse than the Gulf Oil Spill), or storage of oil and gas. There is no such lining (as evidenced by the frack pits in the West and shoddy engineering being the rule) that can prevent seepage of petroleum into the water table, or into Seneca lake. Has one even been suggested? The geology will certainly not bear it, and it would bear it even less should we become enthralled with gas-wells in the near future. The fracking of these wells WILL disturb the underground geology, is suspected of causing earthquakes in Arkansas, and most certainly causes water pollution from waste disposal and from underground percolation of remaining sand, water and synthetics mixed with the radioactive shale and gas upwards.

Protect us. We do not need the last gas, or the last petroleum, but, instead, to accept when it is gone, stop this machine and throw it away, lest it's decay keep us from ever having a future. If you are a man of means, may you be empowered as well to help us transition to the solar, wind, solarthermal, geothermal, conservationist survival state of all things modern, as well. If not, trust those that can. Find your allies and protect our water.

In Brotherhood,

Mike Harter

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**From:** "Bill Tague" <billtague@empacc.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/20/2011 10:05 AM  
**Subject:** Question

Dave,

I have been receiving several emails from neighbors regarding the Hydrofracking/Butane storage under/near Seneca Lake. Obviously the emails are filled with discontent, outrage and environmental concerns. Before I pass judgement on the project I wanted to ask a few questions: 1) What are the potential environmental concerns...negative and positive. 2) What are the transportation issues that we may experience from the increases in Semi traffic in a already congested area. 3) What type of positives (financial/job creation) will the community experience? I look forward to your prompt reply regarding these issues.

Thanks,  
Wm. F. Tague  
Watkins Glen Business Owner

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**From:** Eric Aceto <eric@ithacastring.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/19/2011 11:49 AM  
**Subject:** hydrofracking

Hello,

I would like to voice my concern over the possibility of allowing the drilling for natural gas using hydrofracking in our beautiful fingerlakes area. I strongly believe that it would have serious and far reaching negative impact on our quality of life and environment here .

Please help to protect our beautiful area from degradation .

Sincerely,

Eric Aceto  
visit on the web  
[www.ithacastring.com](http://www.ithacastring.com)

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**From:** Jess Youngquest <finsterco@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/19/2011 10:25 PM  
**Subject:** fraking concern---

Mr. Bimber;

As resident of Lodi in Seneca County, I am deeply concerned about this subject of hydrofraking. I am well informed on the pros and cons of the process to retrieve gas from the Marcellus Shale that we live above.

Please be advised that I and the greater community DO NOT WANT this action to occur in or around our beautiful state of New York. We are better off to have the wonderful resources of the lakes, streams, forests and the air we breath left alone so that we and our families can live in a healthy environment. This will also encourage the visitors and tourist that enjoy our natural beauty to return again and again. Our community now depends on this industry of commerce that we have been building on for the past forty years.

As you are well aware of, the gas companies come and promise a clean and safe extraction of the product, but in all truth, it has been proven to only leave the land scared, the water poisoned, the air fouled, and communities broken and ruined for a long time to come.

Once again, we the citizens are asking / telling our public officials NOT TO LET THIS HAPPEN HERE. What want is to encourage renewable and sustainable energy policies to be allowed as a way of life in America and the world will follow. Please, do the right thing and say NO to the companies that will be here and gone.

thank you,

Jess P. Youngquest

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**From:** Greg <rjgreg@lightlink.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/19/2011 6:23 PM  
**Subject:** Gas Hydrofracking and storage

Mr. Bimber, I would like to express my concern about the dangers and environmental problems that might be caused in the New York State Southern Tier by hydrofracking. A number of us are very concerned about the quality of our ground water here. Its is already difficult to find good quality ground water in some areas. For example, you might find silt, salt, sulfur and even natural gas depending on where and how deep you drill a well. Hydrofracking will add to this problem. The industries admits the 10% of wells in a given area could suffer related problems from hydrofracking for natural gas. At the present time the natural gas industry promoting hydrofracking is also promoting compressed natural gas for cars, saying it is a environmentally friendly alternative to gasoline. This is true, but there is research showing that by time the CNG industry gets its system installed, extraction, storage and distribution, another more eco friendly solution will be ready, electric cars charged by wind and solar. We tend to make this mistake of promoting the wrong technological solution a lot for a quick profit. Some people benefit at other expense.

I feel that we should not allow hydrofracking in NY. Yes there will needed jobs developed, but if we pursue Jobs related to wind and solar, we will be much better off.

Thank you

Greg Grodem

18

**From:** T-Burg Pourhouse <tburgpourhouse@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/20/2011 11:11 AM  
**Subject:** Inergy's destructive plan for Watkins Glen

Mr. Bimber,

I am a resident of Reading, specifically Irelandville, and within a one mile radius of the Inergy expansion project. Due to my insanely hectic schedule owning a business, I admit to falling behind in keeping abreast of local happenings and just found out about this whole project less than two weeks ago. My first reaction was shock and great sadness, as my husband and I have spent the past ten years (exhaustively) restoring a beautiful old farmhouse, barn and property, moving here from Philadelphia to enjoy the beauty and solitude of the area which we fell instantly in love with visiting here ten years ago.

The overwhelming risks involved in this project including permanent contamination of our drinking water and Seneca Lake, based on an industry track record of such contamination more heavily occurring in storage areas utilizing empty salt mines/caves, \*should\* be more than enough to stop this desecration in its' tracks through environmental protection acts, laws, and agencies. But apparently not.

There has not been a large public outcry on the issue, which means that Reading and Schuyler County officials had little trouble approving the project, due to it's almost non-existent and truly pathetic press coverage. The officials that are supposed to be protecting their communities, seem to be easily bought with offers of 'new jobs', new money coming into the area, and who knows what other personal gains. I would argue that this project will result in many people moving away from the vicinity, so the new jobs will displace those abandoning ship.

For me (and my family) personally, an equally troubling item on the roster is the significant increase in the train and truck traffic that will pass right in front of\* and \*right in back (train track) of my house. That in itself may be enough reason for us to move from the area. And if we move, it will be out of the area altogether, as we will be too angry and disgusted with local government to consider staying, not to mention the toxic-laced water. Right now, there are two or three trains a day passing behind our house. It's incredibly loud of course, shakes the house sometimes, but we can deal with a few trains a day, came with the place (that we love dearly). Ten or twenty daily trains passing behind our house, including throughout the night, would annihilate any solid sleep in our lives and be so annoying, we would no longer be able to stay.

As for the trucks, I live on County Route 28 and my stretch would likely be a shortcut route for the many \*many\* trucks passing through. Goodbye solitude.

The holding pond seems ludicrous to begin with, and having grown up next to Hammermill Paper Company in Erie, Pa, I am confident that it will be illegally dumping excess or whatever undesirable fluid they want, into Seneca Lake. The official monitoring of what they are doing will be minimal, and the fines probably worth it anyway for a company making lots of money. Once the ball is rolling, it will be very difficult to stop.

Hammermill had a pipe coming right out of the cliff wall spewing industrial waste acids right into the lake, even though it was completely 'illegal' even then. A young friend's face was severely burned when she went up to the pipe thinking it was fresh water and nearly took a drink (I pushed her nearly off the cliff trying to prevent it). Very little enforcement,

especially combined with very difficult financial times (gov't cut-backs), will result in extensive permanent damage to the lake even if the caverns don't leak (or explode).

The viability of the entire tourist trade, including the Wine Trail, the race track, the stunning glen gorge, the recreational lake use, will be significantly threatened, and could suffer irreparable consequences with a 'spill' or incident.

The truck traffic itself will be an instant \*big\* problem for the wine trail, enough to easily discourage regional tourists from return visits and for tour bus lines to favor other lake's wineries and restaurants instead. Already there is standstill traffic through town on most summer weekends. This new stream of trucks would make life miserable for members of this community in terms of noise, pollution and traffic, year-round. This type of transport and industry should be required to dwell in industrial zones- the real ones, with warehouses, factories, and appropriate roadways and highway access. They can pay for huge steel tanks and bury them there instead of threatening our health, safety and future growth potential. This behemoth project is a huge mistake for the natural beauty that\* makes\* this the place it is- the place that many many thousands of city-dwellers and other visitors flock to annually to enjoy and take in the view and fresh air, and the place that folks like us, so taken by it, moved to. Please consider this community in these proceedings- our health and well-being.

Thank you,

Elizabeth Chiron  
3355 County Route 28, Irelandville Road  
Watkins Glen, NY 14891

bethchiron@gmail.com

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**From:** "Bayer-Broring, Carolyn" <carolyn.bayerbroring@dhs.gov>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/21/2011 5:36 PM  
**Subject:** LPG / Butane storage in Watkins Glen concerns

Mr. Bimber:

As the owner of a lovely vacation home in the Village of Watkins Glen, I am horrified to hear of the plans for storage of LPG and butane in salt caverns in the vicinity of Watkins Glen, as well as the proposed installation of a brine holding pond in the vicinity.

We visit our vacation home in Watkins Glen at least once a month, making the 5 - 6 hour drive up from Maryland, so that we can hike the trails, fish in the lakes and streams, boat on Seneca Lake, enjoy the scenery, and generally enjoy the lovely things that the Watkins Glen area has to offer. That could all be ruined - permanently - if this plan is allowed to go forward.

Already, in our monthly visits we have noticed the increased heavy truck traffic rumbling through the Village crossroads. We often come down to the Village to stroll with our dogs, window shop, go to the bank or post office or Village office, and generally enjoy ourselves. Since this heavy truck traffic increased this summer, it made it quite dangerous for us to cross the streets and negotiate traffic safely. How can anyone think that this is going to help increase pedestrian traffic and visitors to the Village? The Village desperately needs visitors at all times of the year to help keep businesses afloat. If these trucks continue their non-stop barrage on our streets, no one is going to want to come visit. There are plenty of other quaint Villages in upstate New York that would welcome visitors. Trumansburg is quieter, Corning is quieter, even parts of Ithaca are quieter. People can certainly take their business elsewhere if they want to visit, have a meal, window shop and spend some visitor dollars. The Village can't afford to lose that revenue, and should be investigating every possible way to increase visitor revenue - not chase it away.

And what if there is an accident? Time and again there have been well-documented reports of tragic accidents involving storage in salt caverns and accidents involving brine ponds. If the Village suffers an incident such as this, it will NEVER recover. That kind of environmental damage is permanent. If you think the economy is bad now, just wait for something like this to happen, and all that the Village is about will be gone. For good.

Please don't let this go forward. There have got to be better options

that can be explored. This cannot happen. Thank you for your time and attention.

Carolyn Bayer-Broring  
Blue Crab Racing

Wk ph: 703-285-8670  
Wk fx: 703-285-8713  
Carolyn dot BayerBroring at DHS dot gov

Hm ph: 301-987-2221 (MD)

Blue\_Crab\_Racing at MSN dot com

P Help save a tree. Don't print this e-mail if you don't need to.

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**From:** Jennifer Wofford <woffordj@gmail.com>  
**To:** David Bimber <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/21/2011 1:57 PM  
**Subject:** Re: A vote to NOT drill for natural gas in upstate NY

Thanks again David for this. I understand now the distinction between the role of the DEC and the legislature.

I've reviewed the DSEIS.

Can you explain the purpose of the period for public comment? Is it just to comment on the scope of the to-be-completed impact evaluation?

Jen Wofford

On Thu, Jan 20, 2011 at 8:30 AM, David Bimber <dlbimber@gw.dec.state.ny.us> wrote:

> I'm not really familiar with the individuals in our Albany Office who are working on this problem. But the Department has a website dedicated to Marcellus shale issues & information:  
<http://www.dec.ny.gov/energy/46288.html>

> There may be contact info at that location regarding the Oil & Gas folks that are managing that review.

> Best of luck. Please let me know if you have any questions regarding the local LPG storage project. I have attached the public notice (good project description) and the scope (outline for the dSEIS) for your information and review. Let me know if you have problems with the attached files.

> Dave

> David L. Bimber  
 > Deputy Regional Permit Administrator  
 > NYS DEC, Division of Environmental Permits

> Email: dlbimber@gw.dec.state.ny.us  
 > Voice: 585-226-5401  
 > Fax: 585-226-2830

>>>> Jennifer Wofford <woffordj@gmail.com> 1/20/2011 8:16 AM >>>  
 > Interesting. So much for the accuracy of journalism. Have you an idea  
 > of who (if anyone...) in the DEC might be interested in hearing voices  
 > from the community on this subject?

> Thanks for your reply,  
 > Jen Wofford

> On Thu, Jan 20, 2011 at 8:03 AM, David Bimber <dlbimber@gw.dec.state.ny.us> wrote:

>> Jennifer: Thank you for your note. I have similar concerns. However, I have nothing to do with hydrofracking in my current position here at DEC.

>> Thanks

>> Dave

>>

>>

>>>> Jennifer Wofford <woffordj@gmail.com> 1/19/2011 10:48 AM >>>

>> To David Bimber:

>>

>> Until we know more about the chemicals that will be used to extract  
>> natural gas from the Marcellus Shale, we here in upstate NY (Tompkins  
>> and surrounding counties) BEG that the DEC stop all attempts of Inergy  
>> and other drillers from tapping the Marcellus Shale. I understand that  
>> hydraulic fracturing chemicals are a "trade secret," but because they  
>> will surely be entering our lakes and water supplies, we must delay or  
>> stop until we know all.

>>

>> I love where I live - in beautiful, thriving small town Trumansburg,  
>> NY, where my young children and husband and I spend our summers in the  
>> lake and drink out of the tap. But we PAY for the use of this natural  
>> loveliness with the highest property taxes in the nation.

>>

>> The young families supporting NYS and its upstate counties will MOVE  
>> OUT - I guarantee it - once the waters become polluted and the very  
>> companies many of us understand as simply villainous move in.

>>

>> --Preserve our natural resources.

>> --Protect our children and everyone Upstate from poisoned water.

>> --Prevent the brain drain and erosion of the tax base that will follow  
>> under-researched and under-protected natural gas drilling.

>>

>> Put a STOP to plans to railroad upstate NY into natural gas drilling.

>>

>> Respectfully,

>> Jennifer Wofford

>> 54 Cayuga St.

>> Trumansburg, NY 14886

>>

>>

>

>

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**From:** Rooster Fish Pub <roosterfishbooking@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/21/2011 8:17 AM  
**Subject:** hydrofracking/butane storage

As a community of environmental advocates that include all aspects of nature connection, we continue to be stunned and outraged that such a fragile ecosystem could be targeted for on-going raping and pillaging this serene area.

We are absolutely against any form of committing a crime against nature by injecting or exploring any impurities into our soils and grounds.

Watkins Glen and all surrounding areas are intricately connected and any damage done to one area will be done to all.

We don't believe that experimenting with our planet for potential energy gains is the solution of sustainable and conscious thinkers.

We are one Earth, one Planet, and one People. Consideration must be given to all aspects of nature, not just human nature

Sincerely,

Kathy Pettet and Rooster Fish

--

301 N. Franklin St  
Watkins Glen, NY 14891

607.535.9797 (restaurant)

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(2 emails)

**From:** "R. Davis" <davis4470@roadrunner.com>  
**To:** "David Bimber" <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/25/2011 11:51 AM  
**Subject:** Re: Comment on Proposed Storage of LPG in Salt Caverns near Seneca Lake in Schuyler County

Dave,

Thanks for your response. I've read the scoping outline and am quite satisfied with it. My only concern is that a review of existing salt cavern storage facilities is not in the outline. As far as I can ascertain, there are only about 40 of them in the U.S. and about 10 of them have had significant events - a record that suggests that salt caverns have inherent problems from a safety standpoint not found in other types of underground storage facilities.

Thanks, Bob Davis

----- Original Message -----

From: "David Bimber" <dlbimber@gw.dec.state.ny.us>  
 To: "R. Davis" <davis4470@roadrunner.com>  
 Sent: Tuesday, January 25, 2011 8:41 AM  
 Subject: Re: Comment on Proposed Storage of LPG in Salt Caverns near Seneca Lake in Schuyler County

Thank you for your comments. I will place you on my email list for project information and updates as our environmental review moves forward.

Please let me know if you need a copy of the scoping outline

Dave

David L. Bimber  
 Deputy Regional Permit Administrator  
 NYS DEC, Division of Environmental Permits

Email: dlbimber@gw.dec.state.ny.us  
 Voice: 585-226-5401  
 Fax: 585-226-2830

>>> "R. Davis" <davis4470@roadrunner.com> 1/21/2011 11:04 AM >>>

From: Robert E, Davis  
 To: David Bimber, Deputy Regional Permit Administrator, NYSDEC  
 January 21, 2011

Comment on Proposed Storage of LPG in Salt Caverns near Seneca Lake in Schuyler County

Finger Lakes LPG Storage, a subsidiary of Inergy Liquid Propane of Kansas

/

City, Mo., is seeking Department of Environmental Conservation approval to store up to 2.1 million barrels, or 88.2 million gallons, of LPG in the salt caverns above Seneca Lake in Schuyler County..

The DEC has determined that the project could result in enough adverse impacts to require the preparation of a site-specific, project-specific Draft Supplemental Environmental Impact Statement. The DEC Region 8 office in Avon is lead agency for the State Environmental Quality Review Act process for the project.

Accidents are rare but catastrophic when they do occur

According to the Energy Information Administration, there are over 400 underground natural gas storage facilities in operation in the United States, of which about 7% are salt cavern facilities.

In August, 2004, a natural gas fire occurred at the Moss Bluff storage facility in Liberty County, Texas. The reported failure of a single emergency shut-off valve severely damaged one of the three salt caverns that had been leached in the Moss Bluff salt dome for the purpose of storing natural gas. The estimated replacement value of the cavern was in the range of \$15 to \$20 million. Gas worth a reported \$36 million or more was lost. Fortunately, no serious injuries or loss of life occurred, although many families living in the Moss Bluff area were inconvenienced by an evacuation that lasted several days.

Statistically, the odds are remote that single-point failures involving natural gas storage facilities can produce the kind of catastrophic losses such as what occurred at Moss Bluff. Be that as it may, they have happened before. In every case, a salt cavern storage facility was the culprit, not a depleted reservoir or aquifer gas storage facilit

a.. In the Houston area, a devastating explosion and fire occurred at the Brenham salt cavern storage facility in April 1992 when a storage cavern was over-filled and leaked liquid petroleum gas (LPG). Several people were killed in that catastrophe.

b.. In 1980, a similar LPG leak caused by corroded casing resulted in an explosion and fire at a salt cavern storage facility located on the Barber's Hill salt dome, which is home to a multitude of salt caverns comprising the Mont Belvieu salt cavern storage complex, not far from Moss Bluff.

c.. Another explosion and fire occurred at the Mont Belvieu storage complex in November 1985, killing two people and prompting the evacuation of the entire town's population of more than 2,000 residents.

d.. Yet another fire and explosion occurred at the Mont Belvieu storage complex in October 1984 that caused several million dollars in property damage.

e.. In 1978, a failure at a crude oil storage cavern at the West Hackberry salt cavern storage facility in south Louisiana caused the release of an

estimated 72,000 barrels of crude oil, which caught fire and killed one worker.

f.. An explosion and fire occurred in January 2001 at the Yaggy salt cavern facility near Hutchison, Kan., resulting in several deaths and substantial property damage.

g.. In the early 1970s, the Eminence salt cavern gas storage facility in Mississippi experienced such severe salt creep (i.e., the shrinking or collapse of cavern walls) in one of its caverns that almost half of the cavern's storage capacity was lost.

h.. A casing leak at Entergy-Koch's Magnolia salt cavern facility near Napoleonville, La., resulted in a large quantity of gas reportedly being vented to the atmosphere, which forced the shutdown of the facility as well as the evacuation of residents in the area until the leak was contained.

i.. In the early 1990s, the now-defunct U.S. Energy subsidiary of Germany's Metallgesellschaft contracted for a third party to develop a salt cavern for natural gas storage at the Stratton Ridge salt dome in Brazoria County near Freeport, Texas. The cavern failed a mechanical integrity test because it leaked gas when pressured up for storage and had to be abandoned.

A permit should not be issued for this facility above Seneca Lake. Clearly, it carries with it a small but nonetheless significant risk of a catastrophic event that is unacceptable. Decisions are also driven by other factors. Besides the risk of a catastrophic event, other factors include impacts on land and water. The site is above Seneca Lake, a major source of drinking water for Schuyler, Ontario, Yates and Seneca counties.

Robert E. Davis is a founding member of The Committee to Preserve the Finger Lakes and the publisher of [www.preservethefingerlakes.com](http://www.preservethefingerlakes.com). He retired from Procter & Gamble as Research Manager for New Products Worldwide. He was involved in product safety and environmental issues throughout his career at P&G. He was P&G's Market Research Group Supervisor for Packaged Soaps and Detergents in the late 1960's and 1970's during the controversies over the impact of phosphates and NTA on water quality. After retiring from Procter & Gamble, he founded Product Development Systems, Inc. and later became a Vice President and Officer of Market Facts, Inc. He is on the Editorial Board of the Journal of Product Innovation Management. Articles by him have appeared in journals in the United States, Canada, and Europe.

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19:34:00

23

**From:** lewis22908 <lewis22908@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/23/2011 4:50 PM  
**Subject:** LPG storage project on Seneca Lake

Dear Administrator Bimber,  
I don't believe I can add much to the well written letter you received already from Steve Coffman (copied below), so I will not try. I just want to add a note about how much this concerns me as a person who spent my childhood summers on Seneca Lake and still have lots of family who lives on this Lake, which makes it a very special place for me! I hate to see all the pollution risk that this proposal has for our beloved lake and hope that when you read the facts and concerns like these you will help us stop this madness!  
thank you  
Jill Lewis

From: Steve Coffman

To: David Bimber, Deputy Regional Permit Administrator, NYSDEC

January 21, 2011

Dear Administrator Bimber:

In reference to the Finger Lakes LPG Storage project in Salt Caverns near Seneca Lake in Schuyler County, I find this to be an extremely unfortunate and shortsighted project.

Undoubtedly, you have received numerous comments on the many spills and explosions that have occurred in similar projects across the nation. While those accidents are indeed worrisome, my emphasis specifically concerns Seneca Lake.

Seneca Lake is the heart and anchor of the Finger Lakes, not only centrally located but containing 50% of the Finger Lakes' waters. For the Finger Lakes to remain healthy as a resource and viable to a burgeoning region, Seneca Lake must be protected at all costs.

A 2006 study by Hobart & William Smith's Finger Lakes Institute portrayed Seneca Lake as a body of water on the brink of unreclaimable contamination. While some slow progress has been made since that report, this proposed project takes our region in exactly the wrong direction for community as well as environmental reasons.

The Finger Lakes are the largest source of fresh water wholly within the United States (the Great Lakes being shared with Canada, of course). I hardly need to point out the importance of fresh water in a world where that most precious of resources is becoming evermore scarce. And what that means for us in the Finger Lakes, as well as for NYS and DEC, is that we have a particular obligation to be long-sighted in this respect.

Perhaps, asking DEC to consider "moral imperatives" is unusual and beyond the parameters of GEIS scoping; however, such a consideration is vital to the future well-being of the Finger Lakes Region, not only for its

agriculture, wineries, growing agri-tourism, esthetic qualities, retirement appeal and Mennonite communities, but for the intrinsic value of the water itself. All of these elements fall well within the mission of DEC.

Without doubt, the nation needs energy and LPG is presently an important component of that need, which may necessitate bypassing certain local dissatisfactions, perhaps even weigh against certain "acceptable" risks. But there are things that cannot be put on the bargaining table, and the essence of the Finger Lakes and the value of its waters belong in that non-negotiable category, even if certain local officials are too shortsighted to realize their obligations.

It is for just such necessary oversight that DEC exists.

Finally, I clearly recall when, in conjunction with a proposed waste-to-energy garbage incinerator in our region, it was recommended that the Retsoff Salt caverns would be an ideal receptacle for toxic fly ash from the incinerator.

DEC even referred to the Retsoff salt formation as "essentially eternal," a description that proved considerably over-optimistic when, as I'm sure you recall, portions of the formation collapsed before the proposal was even off the table, doing considerable damage to many wells and the poor old Genesee River. One can only imagine what the extent of the damage might have been had 20 or 30 years of concentrated toxic incinerator fly ash been added to that salty mess.

Rather than risking repetition of such an overly-optimistic assessment when it comes to the salt caverns adjacent to Seneca Lake, what is required here is an intensely-skeptical approach, which, I have no doubt would lead to the rejection of this half-baked and shortsighted plan.

Thank you.

Steve Coffman  
Dundee, NY  
Member of Committee to Preserve the Finger Lakes

**From:** jeffrey dembowski <jcdembowski@gmail.com>  
**To:** David Bimber <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/22/2011 8:00 PM  
**Subject:** Proposed Finger Lakes LPG Storage Facility

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 2 emails

David L. Bimber  
 Deputy Regional Permit Administrator  
 NYS DEC, Division of Environmental Permits

January 22, 2011

Mr. Bimber,

I am writing to comment on the proposed Finger Lakes LPG Underground Storage Facility in the Town of Reading, Schuyler County, New York.

I own property less than two miles south of the proposed project site at 3428 CR 28 in Irelandville, New York. My property also happens to be less than 200 yards from the Norfolk & Southern Railroad lines which Inergy Corp. plans on using for the transport of butane gas.

As you can well imagine, I have grave concerns for how this project may negatively affect the area in general, and my property and life in particular.

Problems such as surface and ground water contamination; light, noise and air pollution; potential surface and subterranean explosions; aesthetic intrusions; negative impact on the growing wine and tourism industry and increased truck and rail traffic are very real possibilities/probabilities if this proposed facility is built. I ask: "What is the upside for the area if this project is built?" I believe any upside is far outweighed by all of the potential negatives.

The increase in truck and rail traffic will definitely and immediately affect my property. Currently on my stretch of CR 28, there is no posted speed limit or restrictions on truck traffic. As a consequence, speeding traffic of all kinds is already an issue. Also, CR 28 is used as a short-cut between Rts.14A and CR 23. I have no doubt that if this facility is constructed, trucks hauling propane will use this short-cut as well. This is an area that has several homes very close to the road - some with small children. The area also has a winery and bed and breakfast that draw many tourists. The combination of all of these factors when coupled with increased truck traffic is a recipe for disaster. Currently, about two or three trains a day pass on the Norfolk & Southern tracks. When the trains pass, my whole building rumbles and vibrates. My building is an historic drovers tavern built in 1828. I have serious concerns about any significant increase in rail traffic in regard to potential structural issues it may cause to my building as well as those of my neighbors. Also, though it may be a remote possibility, if a train hauling butane or propane were to derail in the area and an explosion were to result, loss of life would be likely. I also feel it is worth noting that the problems associated with the proposed Finger Lakes LPG Underground Storage Facility do not exist in isolation. If horizontal hydrofracking is eventually approved in New York, all of these issues will only be magnified and compounded.

With all of the efforts that are currently being made to improve Watkins

Glen (water front redevelopment, the creation of an historic district, etc.), it seems the proposed LPG storage facility runs counter to all of these very positive efforts.

I cannot at this time support the construction of the Finger Lakes LPG Underground Storage Facility. Furthermore, I will not be moving forward with the restoration of my building in Irelandville until this matter is settled. If the project is approved as proposed, in all likelihood I will sell my property and invest in another region.

Thank you for your consideration.

Jeffrey C. Dembowski  
335 State Street  
Albany, New York  
12210

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NYS DEC, Division of Environmental Permits

Email: [dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)

Voice: 585-226-5401

Fax: 585-226-2830

>>> jeffrey dembowski <[jcdembowski@gmail.com](mailto:jcdembowski@gmail.com)> 1/2/2011 3:28 PM >>>

Dear Mr. Bimber,

I understand that a Draft EIS will be required for the proposed Finger Lakes LPG Underground Storage Facility.

I own property less than two miles from the proposed project and less than 200yds from the Norfolk & Southern Railroad tracks. As you can well imagine, I am quite concerned about the potential impacts this project will have on the area and my quality of life. What is a realistic time frame for resolution of this issue (either positive or negative regarding the construction of the facility)?

I would appreciate as much information that you are willing/able to share regarding this matter. I will not be investing any more time or money into my property until I know if this project will be moving forward.

Thank you for your consideration.

Jeffrey C. Dembowski

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**From:** "Mark Venuti" <mark@heatonandvenuti.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/23/2011 2:28 PM  
**Subject:** Comments on draft scoping document re Finger Lakes LPG Storage proposal

Dear David,

This is a comment on the proposal of Finger Lakes LPG Storage to store LPG in the underground salt caverns near Seneca Lake.

I believe our most important obligation to future generations is to protect the environment, the land, water and air necessary for survival and upon which the quality of life available to future generations depends. To this end we must always err on the side of defending the environment from potential degradation, and for this reason I oppose the pending application. The fuel being stored may make its way to Seneca Lake and other water supplies, and to the surrounding land, and trucking it in and out poses its own dangers. The applicant cannot show there is no risk to the environment, and that is enough.

Will future generations look at us with disdain because we failed our sacred duty to leave this land as good as we found it, or will they be thankful we protected it for them and sacrificed short-term financial gain? Your agency's actions will play a large role in the answer to this question.

Mark

Mark A. Venuti, Esq.  
 Heaton & Venuti, LLP  
 118 Genesee Street  
 Geneva, NY 14456  
 Tel 315-789-4549  
 Fax 315-781-2295  
 mark@heatonandvenuti.com

----  
 118 Main Street  
 Penn Yan, NY 14527  
 Tel 315-536-9971  
 Fax 315-536-9933

**From:** "Shalestone Vineyards" <info@shalestonevineyards.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/23/2011 10:28 AM  
**Subject:** Gas storage at Watkins Glen

26

Dear Mr Bimber,

I am a grape grower/winemaker making my living on seneca lake. Every day I abide by DEC and health agency laws that were created to protect the environment we live in. While some laws seem excessive, I understand their need to regulate how we affect our environment and ecosystems.

Regarding the gas storage facility being planned in the salt mines around Watkins Glen- All I ask is that you protect the public, not the gas industry, when reviewing the EIS. There should be NO doubt that this project is safe. While I am against the added trucks and activity I can not be a hypocrite regarding gas drilling, I use gas myself. Please protect the environment like you are supposed to.

You have a difficult job. May your conscience guide you.

Sincerely,  
Rob Thomas, owner of Shalestone Vineyards  
9681 Rte 414  
Lodi, NY

**From:** "sr12208185@juno.com" <sr12208185@juno.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/23/2011 6:10 PM  
**Subject:** preserve the Finger Lakes

27

Mr. Bimber: Storing liquified petroleum gas in underground salt caverns near Watkins Glen, NY is an environmental timebomb. Who in their right mind would compromise our region's most precious resource.....its clean water? Keep the trucks, noise, pollution, and toxic waste of the gas industry out of the Finger Lakes Region. Anne and John Quashnoc11741 East Bluff DriveKeuka Park, NY 14478

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**From:** "Jannica Moskal" <jannica@summittostream.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/24/2011 11:46 AM  
**Subject:** Watkins Glen LPG Storage

28 ✓

David,

I am writing as a concerned citizen about the LPG storage near my house. I live on Abrams Road, and I along with my neighbors, are displeased that this will be so close to home. We worry about property values decreasing, and our water supply being hampered and even contaminated. Please let me know if there is a form I can sign, or anything I can do to express my dislike for the proposed project. I tried reaching you by phone and unfortunately I was unable to.

Thank You,

Jannica & Mark Moskal

607-535-2701

**From:** Jeanne <senecajean@aol.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/25/2011 1:59 PM  
**Subject:** Comments Finger Lakes LPG Storage Watkins Glen NY

29

RE: Finger Lakes LPG Storage LLC, Watkins Glen LPG Storage Facility  
DEC 8-4432-00085/00001  
To: David Bimber, Deputy Regional Permit Administrator, NYSDEC  
January 26,, 2011

Dear Administrator Bimber:  
dlbimber@gw.dec.state.ny.us.

I believe this LPG storage proposal to be ill-advised with the potential for a severe catastrophe, which could seriously jeopardize Seneca Lake. Seneca Lake is the largest lake by volume in the Finger Lakes system, containing 50 per cent of the system's water. The Finger Lakes system is the 5th largest source of fresh water on the planet. With Seneca Lake holding a full half of that freshwater supply, the Lake is a vital component of the world's ever dwindling potable water supply.

This alone should put Seneca Lake off limits to any further development or industrial activity which might Potentially pollute the water. The Lake is already stressed by contamination which threatened at one point to be irredeemable and its recovery process has been very slow.

It is the height of folly to even consider placing a brine pond on a hillside overlooking Seneca Lake. This proposed pond would be more than 1,000 feet long, between 382 and 608 feet wide and 32 feet deep, at grades ranging from 8 to 12 percent. Since the project would rely on repeated back-and-forth transfers of brine between the salt caverns and the brine pond, the potential for spills and accidents affecting Seneca Lake are unacceptable.

Thank You

Jeanne Fudala  
1697 School Street  
Alpine, NY 14805-9793

30

**From:** Joseph Campbell <muchado2@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/27/2011 1:02 PM  
**Subject:** LPG Storage in Watkins Glen

Dear Mr. Bimber,

I am a resident of the Finger Lakes and spend much of my time recreating on Seneca Lake. I own a sailboat and keep it at the marina in Watkins Glen. My partner owns lake property almost directly across from the salt plant where this storage facility is being proposed.

I would like to go on record as being very concerned about the planned storage of huge quantities of liquefied propane and butane so close to Seneca Lake. Another concern is the proposed surface pond for the nearly 100 million gallons of brine that will be stored. Seneca Lake is the most pristine of the Finger Lakes, in fact, it is so clean that lake residents and most of the municipalities that border the lake take their drinking water directly from the lake. Storing and transporting LPG so close to this body of water is inviting disaster. The hillside where the proposed surface pond will be situated is very steep. A breach in the pond would allow millions of gallons of "brine" to dump directly into the lake, probably causing a massive fish kill at the very least, and potentially destroying the ecology of the south end of the lake for years to come.

My other concern is the train and truck transfer station. We who live here know that traffic is already a problem, especially during the summer. There is only one two lane road that passes through town and it is already stressed to the limit. I can't imagine the impact the added truck traffic will have.

Watkins Glen and the surrounding area is attractive to tourists exactly because of the bucolic setting, the lake, and the wineries and restaurants. The industrial nature of this proposed storage and transfer facility, with all of the dangers and the added noise and diesel fumes just don't fit.

Sincerely,

--

Joseph M Campbell, DC  
President  
Mary Lukacs MRI Fund

31

**From:** Elizabeth Hoover <thepennsylvaniayankee@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/27/2011 1:56 PM  
**Subject:** Comments regarding storage of LPG near Seneca Lake

Mr. Bimber,

I wanted to take a moment and express my vast concerns about the storage of LPG within salt caverns near Seneca Lake. I will start off by stating that I am a local resident of the area, and that I am not a scientist; however, I have educated myself about issues such as this and the hydrofracking of this area. As far as storing LPG is concerned, I am firmly against it. I do not support storing an environmental hazard within such close proximity to a large source of drinking water and ecosystem. In a perfect world, something like this might be possible to accomplish without environmental contamination, but unfortunately, there is always human error and therein lies the problem.

There is so much that could go wrong with storing liquid petroleum within the caverns. How are we to ensure that it does not leak into the surrounding rock and enter the soil or water? How are we to ensure that none of it escapes into the air? There is always a large possibility of spills during transit such as a truck tipping over, leakage and other such accidents. In regards to the holding pond for the pumped brine, I have large doubts about the integrity of the liners. There have been a frightening amount of spills and lining errors within the hydrofracking process. What makes this liner any different? If a spill were to occur, the brine would drastically affect the soil. What will the affects of a large, ugly 14 acre pond be upon the tourism and agribusiness in the area? What will the increased truck hauling do to our local roads and how will it affect the tranquility of the region?

I have attended seminars in which the pros and cons of this issue have been presented, and I am not in any way satisfied. There is just too much at stake. We have one of the most beautiful wine regions in the world. We have a thriving agricultural business. Both can and will be negatively affected by this undertaking. I can not fathom why someone would want to put this beautiful area in jeopardy. This region of NY and surrounding states is the largest remaining source of fresh water in the world. Why are people so quick to ruin it? I would like to ask you to please consider every environmental impact. The permanent damage that we can do to this area far outweighs the immediate financial gain. We must look beyond ourselves and preserve this land for future generations.

**From:** "Pat & Peter Ladley" <ladley@earthlink.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/28/2011 2:41 PM  
**Subject:** LPG storage near Watkins Glen, NY

32

Dear Sir,

I strongly oppose the project to store Liquid Petroleum Gas near Watkins Glen, NY.

My objections include:

- . danger of infiltration into clean drinking water via Seneca Lake,
- . increased industrialization of pristine environmental habitat,
- . increased truck and other traffic leading to congestion of road and human lungs .

In short the storage of LPG in the salt mines near Watkins Glen is not common-sensible or environmentally sound.

I urge you to consider other options with all due haste.

This is yet another example of the necessity of developing/using alternative renewable sources for our energy needs.

Thank you for your attention,

Patricia & Peter Ladley

502 Underwood Ave.

Elmira, NY 14905

**From:** "Elaine Mansfield" <elaine@lightlink.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 8:51 AM  
**Subject:** Public Comment: LPG storage in salt caverns near Watkins Glen

33

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

- 1.. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
- 2.. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
- 3.. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
- 4.. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
- 5.. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Elaine Mansfield  
4464 Picnic Area Rd.  
Burdett, NY 14818

**From:** "Harriet Eisman" <hcl26@logical.net>  
**To:** "David Bimber" <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 10:04 AM  
**Subject:** Public Comment about LPG Storage in Salt Caverns near Watkins Glen  
**Attachments:** LPG storage public comment letter.doc

34

Dear Mr. Bimber,  
Please see the attached letter.

Thank you,

Harriet Eisman

Jan. 29, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
[dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

1. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
2. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
3. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
4. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
5. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

My friend Elaine Mansfield composed this letter. It is so articulate and well-written that I am basically sending the same. However I want you to know that my husband and I work in Watkins Glen and live in Lodi. Our children live here and in Tompkins County. His mother and brother and his family live in Watkins Glen and Montour Falls. Several of our friends own wineries, and folks we work with live right near the proposed LPG storage site. This is close to us and close to our hearts.

Thank you,

Harriet Eisman  
1491 Caywood Rd  
Lodi NY 14860

35

**From:** Carolsue McCue <herbcottage@hotmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 4:23 PM

Please, please reconsider storing LP gas in the salt mine caverns in Watkins Glen. There are too many variables for disasters. I'm not an alarmist whatsoever, but this beautiful part of the whole Finger Lakes is pristine and gorgeous. Not only do nearly all who live here make their living from being near or on Seneca lake, but tourists are coming here as a number one U.S. destination per the New York Times. Should a disaster like an explosion or leakage could ruin many lives and income.

Please do not let the project continue any further.  
Carolsue McCue  
THE HERB COTTAGE Bed and Breakfast  
At all times please ring: 586.295.4904  
New York website: <http://www.theherbcottagebedandbreakfast.com>

36

**From:** yvonne taylor <speechatgjr@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 5:00 PM  
**Subject:** LPG Underground storage Comment for Scoping document

Dear Mr. Bimber,

I own property on the east side of Seneca Lake, just across from Inergy's proposed LPG storage site in the town of Reading. I was planning to build my permanent residence there this coming Spring. However, I may put my project on hold based on my grave concerns for the lake and the region if this project is allowed to go through, which I hope you will address in your scoping document.

I understand and appreciate that you will be addressing the impact of the project on the land and water to some extent, along with the additional truck and rail traffic, the additional noise, and the visual impact that this proposed plan will present to the region. But because this site is so close to a major fresh water lake that supplies thousands of people with drinking water, what will happen to the lake, the ecosystem around it and in it, and the people who rely on it for fresh water if you approve this permit? What is the history of storing LP gas in salt caverns in similar areas and building open-air pits where large-bodied fresh water lakes are only 1,500-2,000 feet away? These issues are vital to consider closely because of the potentially devastating impact this project in and of itself, let alone an accident or spill, could have on people and the ecosystem within this bucolic area.

I would like you to examine the potential of NORMs (Naturally Occurring Radioactive Materials) coming up from the caverns when the project is being constructed, and when the gas is being removed from the caverns and when the brine solution is extracted and stored. Recent drilling in the area has brought to light that our region has dangerously high levels of Radium-226 below us, and in this process, what is the risk of radioactive materials contaminating workers, water, wildlife, or the public?

What about the back-and-forth transfer of the brine between the brine pond and the cavern: when the brine is extracted, will it eventually be contaminated with chemicals and LPG byproducts? If so, how much of the contamination could evaporate into the atmosphere while it is stored in the open air pit? How will storing this brine in the open impact the wildlife/birds in the area? Will this brine solution and possible contaminants be discharged into Seneca Lake?

Storing LPG in salt caverns around the country has proved to be extremely dangerous, and many explosions have occurred. If an explosion occurs at this site, are our local fire fighters equipped to handle it?

The geology of our region contains many fractures and fissures. How can we prevent the gas from migrating? What will happen if it does migrate? Are these caverns truly suitable for storing hazardous materials?

How will creating another industrial site in a tourist region impact the tourism trade? The grape growing/ wine industry?

Will the VOC ground level ozone produced by the dramatic increase in truck

traffic effect crops in the area? How will the dramatic increase in truck traffic effect the region in general? What about the risk to the environment/ the public with truck traffic accidents while the LP gas is being transported?

The bottom line is that I am adamantly opposed to this project; I feel that the potential environmental risks are far too great. Seneca Lake is a rare fresh water resource; fresh water is becoming more and more scarce on the planet. Please consider the fact that allowing this project to go forward in this location, on this lake, where tourism and agriculture is the lifeblood of the community, is simply unacceptable from not only an environmental, but also an economical, and an aesthetic standpoint.

Thank you for your time and consideration.  
Respectfully submitted,  
Yvonne Taylor

From: "oner\_schmidt@juno.com"

<oner\_schmidt@juno.com>

To: <dlbimber@gw.dec.state.ny.us>

Date: 1/29/2011 6:02 PM

Subject: Very concerned about LPG storage near Watkins Glen

37

Jan. 30, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

We are deeply concerned about environmental issues that relate to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

As the site is so close to Seneca Lake, we are concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.

Additionally, we are concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.

Moreover, we would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.

What are the plans to control noise pollution at this site that is in a rural and tourist area.

We are concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area.

We appreciate your time and thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Ellen and Oskar Schmidt  
8 Genung Circle  
Ithaca, NY 14850

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38

**From:** "Gita Devi" <gdevi@lightlink.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 6:30 PM  
**Subject:** I am opposed to storing LP gas near Watkins Glen/Seneca Lake

Dear Mr. Bimber,

I am a resident of the town of Reading, NY, run a Bed & Breakfast and have attended several meetings related to the proposed hydro fracturing in the Marcellus Shale and the storage of LP gas in the salt caverns near the US Salt Plant on Seneca Lake.

I have listened to and seen the tremendously negative impact on the lives of those in PA who have had their health, their environment and their communities destroyed by the industry. I have seen the aerial photographs showing the destruction of the land. And the industry's indifferent response doesn't surprise me because they are in the business to make money, regardless of the environmental or human impacts. Even the Cornell professor who first devised the process of hydro fracturing is opposed to this. As he said, there is no way to guarantee how the shale will fracture and where the chemicals will go. It is NOT safe.

Storage of the LP gas in the salt caverns is a disaster waiting to happen. Once chemicals leach into the lake, there is no turning back.

Salt caverns have been more prone to catastrophic accidents than the other more common types of underground storage for natural gas or liquefied petroleum gas, or LPG. A 2008 report by the British Geological Survey cited several salt cavern accidents, including an explosion caused by an LPG leak in Texas that registered 4 on the Richter Scale and killed three people, and was felt as far as 70 miles away. In Hutchinson, Kansas, stored gas migrated 8 miles and exploded. If an accident occurs, the evacuation radius would be a minimum of 3 miles, which would include, among other places, all of Watkins Glen.

The lake is the basis of livelihood for this region: tourism, wineries, boating, beauty. Destroy that and you've set the stage for economic disaster in an area that is already struggling financially. Pollute the lake and what effect does that have on the vineyards? Would people be willing to drink wine that is grown using polluted water/land?

Among my other concerns are:

- This will bring an industrial landscape to our area. By-products of the gas are further used to make plastics among other things, and can naturally lead to additional industrial endeavors nearby Inergy's plant.
- New and increased truck traffic will bring excess wear and tear on county and town roads, and local taxpayers will be responsible for the added maintenance expense.
- Added truck traffic will add VOC/ground-level ozone into our immediate atmosphere, which is dangerous to crops - particularly grapes!
- Compressor buildings are very loud, and run 24/7.

-The geology in our region contains fractured jointed rocks with many small fissures and faults. The solution of LP gas components can migrate away from the storage area. We are also not immune to earthquakes.

- When industrial-sized quantities of gas is handled, spills happen.

- Equipment can fail. Human Error and a lack of human training can be hazardous.

- There is the risk of explosion and fire. Are our local fire fighters equipped?

- There will be an impact on our surface water and aquifers. Some discharge will be permitted into Seneca Lake. Contamination of gas, chemicals, and brine is possible. Brine pond failure is possible.

- Will Naturally Occurring Radioactive Material be picked up from within the caverns and brought back up in the brine?

Sincerely,  
Gita Devi. owner  
The Ginger Cat Bed & Breakfast and Devi Designs  
[www.gingercat-bb.com](http://www.gingercat-bb.com) | [www.devidesigns.biz](http://www.devidesigns.biz)  
607.535.9627  
508.404.6271 - cell  
eFax: 1-208-723-0159

**From:** suzanne motheral <coopbiz1@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** <coopbiz1@yahoo.com>  
**Date:** 1/29/2011 7:57 PM  
**Subject:** Comment on Seneca Lake underground storage  
**Attachments:** Seneca Lake LPG storage public comment letter 1-29-11.doc

39

Mr. Bimber,

Attached is my letter of comment which is also pasted below.

Thank you for your attention.

=====  
 Suzanne Motheral  
 766 Elm St Ext  
 Ithaca, NY 14850  
 coopbiz1@yahoo.com

Jan. 29, 2011

Mr. David Bimber  
 Deputy Regional Permit Administrator  
 New York State Department of Environmental Conservation  
 dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am opposed to the proposed project to store LPG in the salt caverns near Watkins Glen until further studies have been conducted for environmental impact. I own land in Lodi so have a direct interest in the health of the region.

My concerns are listed below. I hope that they will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.

I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.

I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.

I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.

I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Sincerely,

Suzanne Motheral

Suzanne Motheral  
766 Elm St Ext  
Ithaca, NY 14850  
coopbiz1@yahoo.com

Jan. 29, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
[dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)

Dear Mr. Bimber,

I am opposed to the proposed project to store LPG in the salt caverns near Watkins Glen until further studies have been conducted for environmental impact. I own land in Lodi so have a direct interest in the health of the region.

My concerns are listed below. I hope that they will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

1. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
2. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
3. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
4. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
5. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Sincerely,

Suzanne Motheral

**To:** <dbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 8:55 PM  
**Subject:** Public Comment about LPG storage near Watkins Glen

**From:** "A.David" <rootwork@localnet.com>

40

Jan. 29, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

As a mother, property owner, business owner, and life-long resident of the Watkins Glen area, I am very deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

- 1.. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
- 2.. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
- 3.. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
- 4.. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
- 5.. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Sincerely,

Amanda David

1385 Beardsley Hollow Rd.

Alpine, NY 14805

41

**From:** Lenore Olmstead <lenorie@lightlink.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/29/2011 10:44 PM  
**Subject:** Project to store LPG in salt caverns near Watkins Glen

Jan. 29, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

damage to our water I am deeply concerned about environmental issues and potential damage to our water systems related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC.

Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.

I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.

I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.

I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.

I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Lenore Olmstead  
1667 Taughannock Blvd.  
Trumansburg, NY 14886

**From:** Sandra Bartone <zeedith@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 3:21 AM  
**Subject:** save our lake

42

David

I am one of the baby boomers who had the honor of living while, The Moral Leader of our Nation, Dr. Martin Luther King Jr. walked the ground I walk. In my opinion we haven't had a moral leader since. The destruction of America, or should I say, "squeezing out the dollar" at any cost" has become the chant of the powerful. The attack on Nature is a battle with devastating effects. Our children's burden is too heavy already. Leave us some space to breathe.

Sandra A Bartone  
Watkins Glen, NY

**From:** Barbara Cook <bcook1638@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 8:42 AM  
**Subject:** gas storage in Watkins Glen

43

Please look closely at the gas storage project for Watkins Glen. We are a tourist industry motivated village and this is not a positive move forward for us. Please do not let this happen. You represent us.....

<bsalmirs@htva.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 9:39 AM  
**Subject:** Storing LPG near Watkins Glen, NY

**From:** "Bert"

44

Jan. 30, 2011

Mr. David Bimber

Deputy Regional Permit Administrator

New York State Department of Environmental Conservation

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

- 1.. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
- 2.. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
- 3.. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
- 4.. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
- 5.. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Bertrand Salmirs

3623 Cty. Rt. 2

PO Box 166

Hector, NY 14841-0166

**From:** <Borrowknsgrn@aol.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 10:07 AM  
**Subject:** LP storage in salt caverns

45

Mr Bimber

I'll keep this short for both of us. Please use all resources available to assure that if LP is to be stored in salt caverns anywhere in the finger lakes that it be with the strictest application of all policies, procedures and safety features that exist today. I have learned a great deal about underground storage and the gas companies and it is very clear, in my mind, that without common sense representation we will be rolled over with impunity. You are our representation!

Regards  
Jim Borra  
ST RT 414  
Hector, NY 14841

**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 10:07 AM  
**Subject:** Public Comment about LPG storage in salt caverns near Watkins Glen

**From:** Debby Howe <howedebby@gmail.com>

Jan.  
29, 2011

46

Mr. David Bimber  
 Deputy Regional Permit Administrator  
 New York State Department of Environmental Conservation  
 dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

1. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
2. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
3. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
4. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
5. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Debra Howe

|

5336 State Route 228  
Trumansburg, NY 14886

**From:** Lester Andrew <lesmaoptions@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 12:02 PM  
**Subject:** Storage of Natural gas, etc near 14 & 14A above Seneca Lake

47

Hi This could do damage to the Lake Water that we all use!!! Please do not allow this to become real!. I am a Lake front owner. Lester M. Andrew 121 N. Glenora Rd., Dundee, NY 14837. Thanks for your listening and please let me know what is going to happen.

48

**From:** Maura Stephens <mstephens@ithaca.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** Maura Stephens <mstephens@ithaca.edu>, Sapio George <sapio@gsapio.com>  
**Date:** 1/30/2011 12:26 PM  
**Subject:** PUBLIC COMMENT on FINGER LAKES LPG STORAGE (INERGY) LPG in salt caverns near Seneca Lake  
**Attachments:** SaltCaverns&LPG-DECLetterMS1-28-11.pdf; Part.002

Mr. Bimber,

Please see attached letter with my comments on Finger Lakes LPG Storage proposal to use salt caverns near Seneca Lake for fuel storage.

I hope to hear back from you in response.

Thank you.

Maura Stephens and family  
PO Box 403  
Spencer NY 14883

✓

**FROM:** Maura Stephens and family, PO Box 403, Spencer NY 14883-0403;  
mstephens@ithaca.edu

**TO: David Bimber**, Deputy Regional Permit Administrator, New York State Department of Environmental Conservation, [dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)

**RE: PUBLIC COMMENT on FINGER LAKES LPG STORAGE (INERGY) request for approval to store LPG in salt caverns near Watkins Glen on western shore of Seneca Lake**

January 30, 2011

Dear Mr. Bimber:

I have just been made aware of the plans by Finger Lakes LPG Storage, LLP, and its parent company, Inergy, to store LPG in salt caverns almost right upon Seneca Lake. The plan includes connection to an existing interstate pipeline; the construction of a 14-acre surface pit on the hillside above Seneca Lake to hold 2 million barrels of displaced brine; storm-water control structure; compressors; a new rail- and truck-transfer facility; and LPG storage tanks; buildings; and the use of the caverns as storage of this highly dangerous and toxic liquid fuel.

My family and I spend a lot of time on Seneca Lake and especially in and near Watkins Glen. We are sickened to learn of the plans to install this facility and hope it will not be permitted. It will surely destroy much of what we love about the area, and keep us from bringing our dollars, and those of our frequent out-of-town guests, there to spend.

Basic common sense and caution lead me to believe there are potentially horrific consequences to such a project. I am writing to request

1. That DEC share the full "Reservoir Suitability Report," produced by Inergy at DEC request, with the public and give us 90 days in which to review it and comment upon it. You should not accept any "trade secrets" or "national security" or other excuses from Inergy or other involved company. This is our drinking water, our lake, and our health, being placed in potential jeopardy.
2. That DEC insist upon a full Environmental Impact Study of this project as well as a Public Health Impact Study and Community Economic Impact Study, all to be undertaken at the expense of Finger Lakes LPG Storage and Inergy or other parent/sibling companies. Among the items that should be studied:
  - a. Impact of increased truck and possibly rail traffic on roads, air pollution, land pollution, and noise levels. This should include the cost of increased health care from asthma and other respiratory ailments and the potential damage from volatile organic compounds released from the additional traffic on people, farm animals, and crops; and the cost of road repair and maintenance, which will be borne by taxpayers and municipalities.
  - b. Cost of lost tourism revenue; the potential impact on agriculture, wineries, and our food supply; and the likelihood of further industrial development tied to the use of gas byproducts (for example, in the manufacture of plastic and plastic-based goods).
  - c. Noise impact on people and animals from the nonstop compressor station.

d. Security, which should be redundant times three, of the containment areas for brine and the liquid fuels. Our region's geology is full of fractured, jointed rock formations with many small fissures and faults, and the LPG can easily migrate from the storage area. There must be a triple-ensured system in place that will not allow any such thing to happen, especially in case of earthquakes (of which we have experienced quite a few in my own memory).

e. Impact of spills on our watershed and especially on Seneca Lake. There is no doubt that spills will happen. There is no way around this. How much is DEC willing to permit? How will you share this information with those who live in this area and are affected by your decision? How can we protest if you decide in what we consider to be an irresponsible manner?

f. Human error is part of life. Equipment fails. These things are inevitable. How can DEC ensure that we ourselves and our water, air, land, and nature are protected from catastrophic consequences of human error and/or equipment failure?

g. Cost of increased firefighters, emergency responders, and hazardous materials experts to respond in the event of explosion and fire. This cost should not be passed onto local communities and taxpayers but covered by the company/companies that want to do business here.

h. Insurance. Who will insure these companies against accidents, explosions, spills, damage to health and the environment, damage to county- and municipality-run roads, bridges, infrastructure? Who will insure local homeowners, landowners, farmers, and passersby? Who will pay these insurance costs?

i. What impact will there be on our surface water, aquifers, and Seneca Lake?

j. What can happen with brine pit failure?

k. What will happen with naturally occurring radioactive material, which might be picked up from belowground and brought up to the surface? What health hazards are possible? How will Inergy pay to protect people from potential radiation hazards? How will DEC or other agency monitor this?

l. Inergy and its subcompanies should be made to grant full access to this facility to DEC, to other state agencies, and to local and national agencies. The public should also have full access to all reports of accidents, spills, faults, leaks; daily NORM, air, soil, and water VOC counts; and even false alarms.

m. Inergy and its subcompanies should pay into a "superfund" at least as much annually to accumulate within five years what your Study shows might be needed in case of a catastrophic failure.

These are just a few of our questions and concerns that should be included in the DEC study. I hope and expect to hear from you in response.

Sincerely,

Maura Stephens  
PO Box 403  
Spencer NY 14883-0403  
mstephens@ithaca.edu

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**From:** Susan Hunter Herbert <shh4@cornell.edu>  
**To:** "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 12:48 PM  
**Subject:** Public comment about LPG storage in salt caves near Watkins Glen

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

1. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
2. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
3. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
4. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
5. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Susan Herbert  
6254 Beard St.  
Hector, NY 14841  
607-546-9611  
607-229-2673 cell

50

**From:** Chris Cook <ccharc@stny.rr.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 1:40 PM  
**Subject:** Finger Lakes Storage Project

Mr. Bimber,

I'm writing to express my deep concern over the proposed LPG storage in the salt caverns in the Seneca lake area. My concerns are many and have been put forward countless times by other. Suffice it to say that I am beginning to feel besieged by corporate interests with no regard for the natural beauty of the area or the safety and well being of life long residents.

Thank you,  
Chris Cook  
Local resident and land owner

**From:** <lyteplyr@aol.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 2:21 PM  
**Subject:** Letter from constituent

51

Dear Mr. Bimber,

I am appealing to your sense of propriety. I am asking you to see the big picture and evaluate whether it is better in the long run for the people of New York to have a few more jobs and risk losing all that we have been working for to create a booming tourism business? Is it better to have more money and less potable water? Is it better to have a few accidents, gas explosions, (like the one in Horseheads recently), lose a few lives, cause disruption of traffic and road repair schedules, step on local residents, etc. in order to fill the pockets of a few (already rich) people?

Please consider very carefully before approving the use of our salt mines in Reading, New York for storage of potentially dangerous LP gas.

Thank you,  
Melissa Chipman  
Hector, NY 14841  
607-546-7719

To: <dlbimber@gw.dec.state.ny.us>  
Date: 1/30/2011 5:55 PM  
Subject: environmental issues

From: "John Herbert" <johnherbert@htva.net>

Jan. 29, 2011

52

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

- 1.. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
- 2.. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
- 3.. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
- 4.. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
- 5.. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

John Herbert  
6254 Beard St.  
Valois NY 14841  
(607)546-9611

53

**From:** Sara Hess <sarahess63@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 6:05 PM  
**Subject:** comments on Storing LPG near Watkins Glen

Dear Deputy Bimber:

Thank you and all those at the DEC for requiring an EIS on this proposal to store LPG in Reading, SchuylerCounty. I've taken the time to learn some things about the proposal, and these are my concerns, and questions.

1. Safety of handling, transporting and containing the LPG can only be assured if there are redundant safety measures in the design and execution and oversight by an outside authority (DEC). Numerous fires and explosions in salt caverns around the country show that they can fail, often from single-point failures. What can you write into the requirements to ensure the public will be safe from

- spills?
- accidents in transport?
- containing the gas in the cavern?

And would the public and outside experts have a chance to see the design, especially related to safety features, before a permit was granted?

2. I understand that the liquid gases are somewhat capable of being dissolved in water when it is under pressure. As the brine is moved back and forth from open air to the cavern, will some of the gas be brought to the surface in the brine and released? What is the green house gas effects, safety and/or health concerns if this happens?

3. The location of the brine pond is too close to the lake and on too steep an incline for assurance against accidental spills into the lake. Double lining does not seem sufficient wherever the location is.

4. Increase train traffic over the Watkins Glen Gorge bridge is a big concern. When was the last time that bridge was painted? Since it changed ownership some years ago, it appears from observation that the maintenance has been lax.

5. What impact would this industrial activity have on other economic sectors in the area, specifically, tourism and wineries? I believe the visual impacts, noise, compressors (which, if built, must have maximum noise mitigation required), and truck traffic in the area would have detrimental effects. I don't know how these impacts could be avoided.

Thank you for your attention.

Sincerely,  
Sara Hess  
124 Westfield Drive  
Ithaca, NY 14850

54

**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** "ITHACA JOURNAL Estes, Bruce (Managing Editor)" <BESTES@ithaca.gannett.c...>  
**Date:** 1/30/2011 6:30 PM  
**Subject:** [Fwd: EPA called Re LPG Watkins Glen]

I would add to this that any of the presently used salt brine wells next to Seneca Lake should have had geophysical tools lowered into them to define the shape and extent of the cavity(s). The cavities more than likely have extended under Seneca Lake which is owned by New York State. Thus, like the CARGILL mine under Cayuga Lake, I would expect that the State of New York had been compensated for the extraction of the salt resource. I would further expect that any and all production records, geological and geophysical data pertaining to the salt cavities has been filed with the State of New York. ???

And has the STONE AND WEBSTER report been reviewed in relation to this project?

Has the detailed work by Robert Jacobi and NYSERDA been reviewed ?

Has USGS in Reston and Ithaca been consulted? If not - why not?

Sincerely

Bill Hecht  
 PO Box 86  
 Union Springs, NY  
 13160  
 315-889-7761

----- Original Message -----

**Subject:** EPA called Re LPG Watkins Glen  
**Date:** Mon, 25 Oct 2010 16:51:20 -0400  
**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** brock.frank@epa.gov  
**CC:** KAPPEL, Bill USGS <wkappel@usgs.gov>, NOZZOLIO, Mike <nozzolio@senate.state.ny.us>, Ingraffea, Tony <ari1@cornell.edu>, Fearon, George <gfearon@hotmail.com>, Lambert, Hilary <hilary\_lambert@yahoo.com>, Enck, Judith USEPA Region 2 <enck.judith@epa.gov>

I received a call just now from Frank Brock of EPA in New York City. Judith Enck had him call me.

brock.frank@epa.gov  
 212-637-3762

He said that LPG storage is exempt under the Safe Drinking Water Act. However- the injection of brine back into the well to maintain pressure does come under the jurisdiction of EPA and would require a permit and review. I made a request to him that when such a review is made by EPA that they do three things:

1- Get all, the data from DEC including the trade secret confidential material.

2- That they contact the other federal agency, the USGS in Ithaca NY, for their input.

3- Make sure that INERGY has turned over ALL geological, geophysical and engineering materials to DEC.

Seems to me one can not pass judgment on the structural geology of an area without a full geological and geophysical review of all data bot public and private. We the public will not see this confidential material but we can and should expect the people and agencies who review this project to confer with each other and review all the data.

Like the Cargill salt mine expansion - we the public will not have this data to make educated comments on the LPG storage facility. Under present NY and Federal laws I see no work around to this OTHER than the agencies due diligence and inter and intra agency cooperation.

If I hear more on this I will pass it along.

Bill Hecht

**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 6:22 PM  
**Subject:** [Fwd: [Fwd: Watkins Glen 1916]]

----- Original Message -----

**Subject:** [Fwd: Watkins Glen 1916]  
**Date:** Tue, 09 Nov 2010 09:29:51 -0500  
**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** pmantius@gmail.com >> "Mantius@aol.com Mantius" <pmantius@gmail.com>

----- Original Message -----

**Subject:** Watkins Glen 1916  
**Date:** Thu, 05 Mar 2009 22:48:41 -0500  
**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** undisclosed-recipients;

Label

<http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures271/27180small.jpg>

<http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures271/27180.jpg>

Image

<http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures271/27181small.jpg>

<http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures271/27181.jpg>

IMAGE WITH ARROWS POINTING TO TWO TOWERS ALON WEST SHORE

[http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures271/27181small\\_arrows.jpg](http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures271/27181small_arrows.jpg)

**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 6:21 PM  
**Subject:** [Fwd: Watkins Glen salt brine well derrick in the village]

----- Original Message -----

**Subject:** Watkins Glen salt brine well derrick in the village  
**Date:** Tue, 09 Nov 2010 11:16:21 -0500  
**From:** Bill Hecht <wsh6@cornell.edu>  
**To:** CENTRAL NY Message Board <NY-CENTRA@rootsweb.com>, Finger Lakes  
Message Board <NYFINGERLAKES@rootsweb.com>, "Collart, Linda (Regions  
6-8)" <lacollar@gw.dec.state.ny.us>, "Enck, Judith USEPA Region 2"  
<enck.judith@epa.gov>

Note the salt brine well on the left of the image in the village

<http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures344/34467small.jpg>  
<http://freepages.genealogy.rootsweb.ancestry.com/~springport/pictures344/34467.jpg>

**From:** Kristina Cummings <kcummings95@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 9:16 PM  
**Subject:** Proposed Inergy LPG storage facility in Reading, NY

55

Dear Mr Bimber:

Just last week, my husband and I received a call from our neighbor, very concerned over a short paragraph she found in the Watkins review and express. It was in regards to the Proposed storage facility. Neither of us knew anything about it and as a result, I went to the informational meeting held in Ithaca on the 27th. I was horrified at what I heard- a 14 acre brine pond, increased truck and railroad traffic, industrialization obstructing views of Seneca Lake and possible (more likely probable contamination of the Lake). How could the leaders of Reading and in turn, Watkins and the DEC even allow such a thing? My husband and I just moved to Reading in June 2009. We chose our house based on location- closeness to town and yet, a tranquil, peaceful setting full of wildlife- deer, turkey, birds etc with the occasional train signaling on the nearby tracks. If we had known what was to come, we definitely would not have bought our house on Abrams Road.

We know that Inergy has proposed that the storage facility will be perfectly safe and has snookered the Town Board into believing that this is a wonderful project but we are not buying it! We are concerned about several things:

- 1.) The quietness of the project- there has been only one public meeting, attended by very few because I would assume, just like ourselves, no one knew about it. We are concerned with the fact that the DEC has not been forthcoming with the full "Reservoir Suitability Report. This should have been available in its entirety to the public. If Inergy's proposal was not so dangerous to the environment, I suspect the full report would be available.
- 2.) We are also concerned that as a result of this project, the increased road and train traffic will create an increased tax burden on the people of Reading and Watkins Glen. As the trucks will be increased over time from thirty up to and probably exceeding one hundred trucks, the wear and tear on the roads will be excessive- will Inergy be paying for this damage? I highly doubt it. Also with an increase in train traffic, our peaceful setting will no longer be peaceful. As the trains will have to blow their whistles every time they cross the tracks, the noise will be intense. Also a young family lives right next to the tracks, will Inergy be putting up a fence or better crossing so that these young children will be able to continue to play outside? What will happen when our 75 year old bridge across Watkins Glen gorge begins to collapse secondary to the increased train traffic? Will Inergy pay for that? What about the noise and air pollution from the increase in traffic? Who will take responsibility for the decrease in crop yield secondary to pollution? Our quiet community will also be destroyed with a 24 hour compressor station. Who is going to buy my house when we need to move because we can't take the noise any longer? Will Inergy?
- 3.) Another concern is the impact the industrialization will have on tourism. Is the storage on LPG gas really worth the probable loss of tourism? Has this even been studied?
- 4.) Have safety issues really been looked at in regards to the brine pond and storage of the LPG gases? Any number of things could happen- a leak, equipment failure, human error, decrease in pressure. What are Inergy's proposed safety measures and how would any of the above be prevented? What about the effect of brine pond spillage into Seneca Lake? This would not only affect Seneca Lake but Cayuga Lake as well because they are connected. They are even connected to the Erie canal system- this would therefore affect Federal waters. Has this been evaluated and the proper authorities notified?

We are very concerned about all this. We are sure there are more issues that we haven't even begun to think of yet. We are concerned that the public has not really been informed properly of the coming risks that could affect not only Reading but all of Watkins Glen and those up and down the lake if there were to be an explosion. We realize this is only a "possibility" but it is an extremely scary one. Are there other ways LPG gas can be stored which are safer and would not affect the beauty of the Finger Lakes area. If this becomes a reality, my husband and I would seriously have to consider moving. Who would buy our house, however, knowing about the dangerous risks? For sure, our property values would go way down.

We would propose that a letter be written to all of the residents of Reading, outlining the proposal as well as including meetings with the DEC experts as well as environmental experts, not paid by Inergy, explaining what may come.

Thank you for your response to our concerns.

Sincerely,

Grady and Kristina Cummings

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**From:** Nan Crystal Arens <arens@hws.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 9:02 PM  
**Subject:** LP Gas Storage Near Watkins Glen

Dear Mr. Bimber:

Based on limnological research, we understand that there are ways in which brine from salt mining in Seneca Lake has leaked into the lake itself. The source of this brine is poorly understood, but likely related to the extensive array of largely unmapped Paleozoic faults in the area that have been reactivated by post-glacial unloading.

I would ask that your impact statement and siting require these faults to be thoroughly mapped so that the risks of catastrophic failure of this storage facility can be accurately assessed.

Nan Crystal Arens  
Department of Geoscience  
Hobart & William Smith Colleges  
Geneva, NY 14456 USA

57

**From:** Waldo Babcock <wbabcock@empacc.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 9:25 PM  
**Subject:** Name of Action: Finger Lakes LPG Storage, LLC - New Underground LPG Storage Facility On Seneca Lake Near Watkins Glen

Mr. Bimber, I want to register my opposition to the proposed underground LPG storage facility on Seneca Lake near Watkins Glen. Between the open pit water storage, transport of water back and forth, the inherent risks of storing vast quantities of a volatile and potential explosive material near a populated area, and the increased truck traffic, it seems to me this project will inevitably have major negative impacts on the environment and well-established local industries, especially tourism and grape/wine production. Any spill or leakage could potentially pollute the drinking and swimming water for thousands of local residents and tourists, as well. I don't think there's a "safe" way to implement a project such as this, so I think it should not be permitted to go forward.  
Thank you for your attention.  
Waldo C. Babcock

---

Waldo C. Babcock  
7284 Waldo Rd, Prattsburgh, NY 14873  
(607) 522-4356 wbabcock@empacc.net

58

**From:** Peggy Fry Keating <pegfrykeating@hotmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 9:40 PM  
**Subject:** Public Comment about LPG storage in salt caverns near Watkins Glen

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.

I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.

I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.

I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.

I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Thank you for your consideration.

Sincerely,  
Margaret Fry Keating  
3970 County Rd. 2  
Hector, NY 14841

59

**From:** john keating <johnkeating9@hotmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 9:46 PM  
**Subject:** Public Comment about LPG storage in salt caverns near Watkins Glen

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.

I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.

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Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Sincerely,  
John Keating  
3970 County Rd. 2  
Hector, NY 14841

60

**From:** Doug Couchon <dcouchon@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 10:26 PM  
**Subject:** Opposed to Inergy LPG storage

Dear Mr. Bimber,

I am opposed to Inergy Corporation's proposed LPG storage site in Reading, NY north of Watkins Glen. The site is \*virtually on top of\* Seneca Lake - a major source of fresh water that supplies thousands of people with drinking water. I am concerned about what will happen to the lake, the lake's ecosystem, the animals that depend on it for life, and the people who rely on it for fresh water if Inergy's permit application were to be approved. Before action is taken, it is vital that the DEC carefully review the history of LP gas storage in salt caverns and open-air pits in areas where large bodies of water are less than 2,000 feet away. My own review finds that storing LPG in salt caverns around the country has proved dangerous. Many explosions have occurred. Not reviewing this history would be irresponsible on the DEC's part given the potentially devastating impact this project or related accidents/spills could have on the people and environment of the region.

Please also research the potential production of Naturally Occurring Radioactive Materials (NORM) during project construction and LPG extraction and storage. Our region has been proven to have potentially toxic levels of subsurface Radium-226. What is the risk of radioactive materials contaminating workers, water, wildlife, or the public during the life of this project? There are many other questions the DEC should ask and answer.

When brine is extracted, stored and redeposited might it be contaminated with chemicals and LPG byproducts? How much toxic material could evaporate into the atmosphere while it is stored in the open air pit? How will storing brine in the open pit impact area wildlife? What is to prevent brine solution from leaching into Seneca Lake? The geology of the Finger Lakes Region contains many fractures and fissures. How can gas product migration be prevented, if at all? What will happen if gas products do migrate? If an explosion occurs at this site, are local emergency personnel equipped to handle it? Could the sensitive Seneca Lake ecosystem survive a major incident?

Will the ground level ozone produced by the dramatic increase in truck traffic affect area crops? How will the dramatic increase in truck traffic affect the region in general? What is the risk to the environment and the public assuming traffic accidents will occur involving LP gas in transport? How will creating an industrial site in a tourist region impact the tourism trade? How will the the grape growing and wine industry be impacted?

I believe the potential environmental risks far outweigh the need to proceed. Allowing this project to go forward at this location, on Seneca Lake, in a region where tourism and agriculture is the lifeblood of the community is not acceptable from any perspective other than that of the oil and gas industry and those who blindly support it.

Thank you for your consideration of my concerns.

Sincerely,

Doug Couchon  
Elmira, NY  
(607) 735-1830

61

**From:** Richard Adams <radams414@htva.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 10:28 PM  
**Subject:** NYS DEC Environmental Impact Statement

Dear Mr. Bimber,

We are two of many who have recently become aware of the Inergy Corporation's proposed storage of LPG in the caverns of U.S. Salt, near Watkins Glen, N.Y.. Living in Hector and using Seneca Lake as our source of drinking water, my husband and I are quite concerned about the possible hazards regarding the storage of LPG in the salt caverns.

Peter Mantius of Burdett, an investigative journalist for DC Bureau, spoke this past week at an informational meeting in Ithaca about the risks of storing LPG in the salt caverns.

Mantius states that salt caverns make up less than 10 percent of 400 or so major underground gas and LPG storage facilities in the United States, according to the federal Energy Information Administration. Yet all 10 of the "catastrophic failures" at underground facilities since 1972 have occurred at salt caverns, according to John Hopper in Energy Markets, a trade publication. Hopper, who has run two underground storage companies, attributed the pattern to salt caverns' particular vulnerability to failures of a single piece of equipment, such as a casing or a valve.

As you know, there are plans to create a brine filled surface pond, which will be dug on the the steep lake side of Route 14, requiring a wall dam to be constructed on the lake side. To make space for LPG, some of the brine will be pumped out and placed in the surface pond. It is proposed that a maximum of 2.10 million barrels of LPG will be stored in these caverns seasonally. Many rail cars and trucks will be needed to transfer these liquids! How will the dramatic increase in traffic affect the region, especially regarding the pristine quality of the area and the effects on tourism, a major source of income in the area? And what about the wineries?? How would accidental spills impact the vineyard lands, not to mention farmlands?

It seems to me that at this juncture the people of Schuyler County have to determine the long range goals for the area. Do we want to give up the idea of having an oasis of beauty, a quiet retreat where people can escape to? Instead do we want an industrialized area, where the population doubles, the noise level increases dramatically, the "rush hour" becomes a nightmare, and the water becomes polluted?

We urge you to think very carefully about the grave damage that could devastate this beautiful Finger Lakes region if this project is approved without proper scrutiny and guarantees by scientific and knowledgeable experts before you go ahead with these plans! The potential damage that is apt to be done to the Watkins Glen area, and the entire Finger Lakes Region, cannot be undone.

Thank you,

Elizabeth A. Adams  
Richard H. Adams  
PO Box 33  
Hector, Ny 14841

**From:** cameron murdock <camrock79@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/30/2011 11:45 PM  
**Subject:** Public comment on LPG storage near Watkins Glen

62

Jan. 30, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
dlbimber@gw.dec.state.ny.us

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

1. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
2. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
3. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
4. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
5. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Sincerely,  
Cameron Murdock  
1385 Beardsley Hollow Rd  
Alpine, NY 14805

**From:** <tstewart2@stny.rr.com>  
**To:** <dbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 9:02 AM  
**Subject:** storing of gas under Seneca Lake

63

Sir,

I run a business on the water that relies on the beauty, purity, and attractiveness of Seneca Lake. Any unnatural destructive action or accidents, or negativity from the media related to the same will alter my living and lifestyle. I am 60 years old, grew up on these lakes and am very sad to see them not cared for by all. Corporations and the vital need for energy, by their very nature, can not care for this water as necessary. I would love to see this "storage" not happen, but more than that, see that the right decisions are made. Thanks, Terry Stewart

**From:** "Michael J. Oates" <oatcakes1948@live.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 9:33 AM  
**Subject:** RE: Finger Lakes LPG Storage

64

Michael J. Oates  
1000 Magee Street  
Watkins Glen, New York 14891  
oatcakes1948@live.com  
(607) 535-9896  
January 29, 2011  
David L. Bimber  
Deputy Regional Permit Administrator  
NYS DEC, Division of Environmental Permits

RE: Finger Lakes LPG Storage Facility

Dear Mr. Bimber:

As per our conversation I believe the following issues should be addressed before the environmental impact statement is submitted to the Schuyler County community and the State of New York.

1. All possible impacts on the land, water, or transportation system of our community.
2. All actual and possible impacts on natural beauty and noise levels of the community.
3. All actual and possible impacts on the integrity of the underground storage caverns.
4. All actual and possible threats to public safety from the collection, storage, and transportation of LPG and any other liquid or gas products, or materials used in the development or operation of this facility.
5. Possible scenarios of any and all potential natural or manmade disasters on the proposed facility, its operations, or our community must be thoroughly investigated. Thank you.

Sincerely,

Michael J. Oates

> Date: Thu, 27 Jan 2011 11:39:54 -0500  
> From: dlbimber@gw.dec.state.ny.us  
> To: oatcakes1948@live.com  
> Subject: Finger Lakes LPG Storage

>  
> Thank you for your interest in this project. I have attached a copy of the public notice and the draft scoping outline for you review.

>  
> Please let me know if I've spelled your name correctly and drop me a return note so I know that you received this info.

>  
> Thanks again

>  
> Dave

>  
>  
>  
>  
>  
>  
> David L. Bimber  
> Deputy Regional Permit Administrator  
> NYS DEC, Division of Environmental Permits

65

**From:** Lory Peck <lory@htva.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 11:41 AM  
**Subject:** scoping comments - Watkins Glen LPG storage

January 31, 2011

David L. Bimber  
Deputy Regional Permit Administrator  
NYSDEC

Dear Mr. Bimber,

I am a long-time Schuyler County resident (of over thirty-five years) so this issue is of particular concern to me. First, I wish to commend the DEC for the work already accomplished in this "Draft Scoping Document". You all have already clearly identified many of the problematic areas.

In my opinion, the following need particular focus:

The Geology of the Salt Caverns to be used for LPG storage. How far down are they? What layers of rock are above and below them? What are known faults and fractures in the area? How will we know that these storage areas will remain intact while under pressure filled with a highly explosive substance and with varying levels of brine possibly further dissolving more salt? The experience of the collapse of the Retsoff Salt cavern does not inspire confidence.

Impacts on Public Safety. Considering the volatility of LPG and past catastrophic disasters across the country with LPG storage in salt caverns, and in pipelines, what are Inergy - Finger Lakes LPG Storage's disaster and evacuation plans? How prepared are the local fire departments and public safety personnel in the case of problems, small or large?

The Brine Pond. At an absolute minimum, the pond needs to be moved to the other (west) side of Rt. 14 onto flatter land, not located on the sloping hillside above the lake. With the brine level in the pond going up and down seasonally, will the brine pick up further contaminants from the LPG? and therefore create further air pollution?

Air Pollution. The proposed increase in truck and rail traffic will create increased air pollution. Of particular concern is ground-level ozone and its effects on crops, particularly grapes, but also alfalfa, grass hay, corn, and other crops.

Brine Discharge - intentional or accidental - into Seneca Lake. From what I understand, the US Salt plant (now owned by Inergy) already discharges brine (under permit by the DEC) into Seneca Lake and that the Finger Lakes LPG Storage proposal asks to increase this discharge. What is the current permitted discharge (I could not find that data)? Why is it permitted in the first place? Why should Inergy be allowed to discharge more? Seneca Lake, the largest of the Finger Lakes by

volume, is an incredible resource of fresh, clean water, and it must be protected.

NORM. The Reading Marcellus well (less than a mile from the proposed site) had the second highest Radium 226 testing level (over 200 times the "safe" limit) topped only by the Webster well in the Sugar Hill State Forest in the Town of Orange. Since the salt cavern will be between two shale layers that often have high NORM levels, and since some of the LPG will be coming from shale gas, this could be problematic, especially with the brine returning to the surface pond seasonally.

The Finger Lakes are the world's number one lake-area tourist area with the lakes and gorges, the wineries, and fields and forests being part of the attraction. Creating an industrial facility with increased truck and rail traffic damages this.

I look forward to the draft GEIS and an opportunity to comment on that. Thank you and your colleagues in advance for your work.

Sincerely,

Taylor Peck  
6315 State Road  
Alpine, NY, 14805  
lory@htva.net

**From:** Sarah Eckel <seckel@citizenscampaign.org>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 12:23 PM  
**Subject:** LPG Comments  
**Attachments:** ExamplesofAccidentsfromGasStorage.doc;  
 CCE\_DraftScopeComments\_LPGStorage\_0111.doc; EffectsofRetsofSaltMineCollapse.pdf

*66  
 Letter attached*

Mr. Bimber-  
 Please find attached CCE's comments on the proposed draft scope of the  
 Finger Lakes LPG site.

Best Regards,  
 Sarah Eckel

--

Sarah Eckel

Legislative Director  
 Citizens Campaign for the Environment  
[www.citizenscampaign.org](http://www.citizenscampaign.org) <<http://www.citizenscampaign.org/>>  
 c: (202) 486-9007

/Find us on facebook  
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## Examples of Accidents from Gas Storage in Salt Caverns

### **Moss Bluff, Texas**

#### **Two explosions within 24 hours**

In August of 2004, a Duke Energy hydrocarbon storage facility suffered an explosion and fire in Moss Bluff, Texas, about 40 miles northeast of Houston. The facility used an existing salt dome cavern to store natural gas, draining salt water from the cavern and replacing it with natural gas for storage.

On the day of the explosion, some of this gas leaked into the pipe used to extract the brine, leaked to the surface, and ignited in a ball of flame. Responders at the field elected to let the fire burn itself out, as is standard procedure, but in less than 24 hours a second explosion rocked the facility, visible from 20 miles away. This second explosion occurred when a wellhead assembly valve gave way.

A surface pipe was found to have severe internal corrosion after the fact, although the pipe had undergone pressure testing within the last few years, in accordance with safety inspection procedures. Despite the fact that the pipe had passed these tests, all emergency shutdown valves functioned properly, and other safety procedures were perfectly adhered to, the resulting fire burned for six and a half days, a 3-mile radius was initially evacuated, and six billion cubic feet of natural gas was burned and lost.

### **Clute, Texas**

#### **Well explosion rocks homes**

Just a month before the Moss Bluff incident, a similar salt dome storage facility in Clute experienced a similar accident. A well fire at Dow Chemical Company's Texas Operations Salt Dome ignited from a leak of ethylene and propylene released during the facility's drilling operations.

The initial explosion rocked nearby homes and was described in local papers as a "ball of fire" the size of a cell phone tower. Residents who felt the blast continued to see a thick column of black smoke on the horizon for two days until the fire was finally extinguished.

Luckily the fire was contained on the Dow site and there were no injuries.

### **Napoleonville, Louisiana**

#### **Families evacuated over Christmas**

On Christmas Day, 2003, some 20 people in Napoleonville, just 20 miles north of Morgan City, were forced from their homes after the nearby Magnolia Storage and Rodrigue Compressor Station began leaking natural gas.

The facility had been operating for only six weeks when a well casing cracked and 350 million cubic feet of gas escaped within just a few hours. The high number of oil and gas fields in the area contributed to difficulty locating the leak, and the evacuees remained stranded through the holiday. Fortunately, the escaped gas dissipated before it could explode.

## **Hutchinson, Kansas**

### **Two killed, clean-up still ongoing**

One of the worst hydrocarbon storage facility disasters occurred at the underground natural gas storage facility Yaggy Field in January, 2001. A high-pressure methane pipe eight miles outside the town of Hutchinson had been leaking for days when the explosions began.

The escaped gas accumulated until it built up enough pressure to break through the topsoil, shooting out of old brine wells in 30-foot geysers of gas and salty mud, which then ignited.

The first explosion occurred downtown, where it leveled two businesses and blew out windows up and down the street. Amazingly, no one was injured. The very next day, however, a gas geyser ignited under a trailer park and killed two people.

Hundreds of Hutchinson residents were evacuated and could not return to their homes for four months.

Response teams spent months drilling exploratory wells hundreds of feet into the earth to find and vent more pockets of gas before they too exploded.

In addition to the lives lost, the multiple businesses destroyed, and the terror experienced by the town, 200 million cubic feet of gas were lost in the debacle. Yaggy Field's operator, Kansas Gas Service, was found to have ignored pressure changes which indicated a leak, and to have otherwise put profits before safety, and was fined the state's maximum fine of \$10,000 for each of 18 violations.

As of March 2009, eight years after the first explosions, remediation efforts at the site are still ongoing.

## **Mineola, Texas**

### **Propane fire burns for days**

When a salt wall cracked at the Suburban Propane facility in Mineola, Texas, in 1995, the release led to an underground propane fire that burned for several days.

## **Wesley, Texas**

### **Three deaths; \$9 million in damages**

On April 7, 1992, in Wesley, Texas, a liquefied petroleum gas leak exploded with the force of a three-kiloton bomb, killing three people and injuring 21 others. The blast was felt 70 miles away in Houston and heard from twice that far, and registered a 4.0 on the Richter scale used to measure earthquakes.

The cavern had been overfilled due to an inventory error, and gas escaped through an injection well used to extract brine. Emergency response to the accident was complicated by the fact that the facility's automatic shutdown, alarm system, and other safety systems were insufficient or failed to work properly.

In addition to three human casualties, the explosion in Wesley killed 40 head of livestock, destroyed 16 homes and damaged 150 more, felled trees and denuded acres of land. An area three miles square incurred property damages of more than \$9 million.

Disturbingly, the 21 people injured in the blast account for fully one-third of the tiny town's population. Casualties in a more densely populated area could have been catastrophic.

### **Mont Belvieu, Texas**

#### **A history of fires, leaks, explosions**

Located 30 miles northeast of Houston, Mont Belvieu is the LPG capital of the world and has a long history of incidents including leaks, explosions, fires, and water well contaminations.

In 1980, a corroded casting joint at Barbers' Hill Dome storage facility leaked LPG from the access well into the soil and eventually into the foundation of a nearby home, where a woman turning on her dishwasher sparked an explosion. 820 million cubic feet of gas was released, and 73 families were evacuated for seven months.

In November of 1985, a contractor cut a propane line, setting off an explosion and fire that took 200 firefighters six hours to extinguish.

Two people were killed in the blast, 30,000 gallons of LPG burned in the fire, and 17,000 people were initially evacuated.

Response teams were foiled when heat from the fires prevented valves from being shut, and three pipelines continued to feed into the burn.

By 1988, the town of Mont Belvieu had experienced so many gas storage related incidents that pipeline companies had bought out two hundred families as part of a \$20 million plan to relocate people away from these dangerous facilities.

### **Petal City, Mississippi**

#### **24 injured in butane explosion**

On August 25, 1974, a liquid butane cavern at Petal City Gas Storage Facility was overfilled, leading to an explosion that injured 24 people and damaged homes as far as seven miles away. The fire burned for five hours, and authorities evacuated 3,000 people from their homes.

*Source: North American Salt Company*

**CITIZENS  
CAMPAIGN**  
FOR THE ENVIRONMENT



www.citizenscampaign.org

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716-831-3206
- ☐ 466 Westcott Street, 2nd Floor • Syracuse, NY 13210  
315-472-1339
- ☐ 129 Church Street, Suite 221 • New Haven, CT 06510  
203-785-9080

**Empowering Communities, Advocating Solutions.**

January 31, 2011

David L. Bimber  
NYS DEC - Region 8 Office  
6274 East Avon Lima Road  
Avon, NY 14414  
[dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)

**RE : Draft Supplemental Environmental Impact Statement Draft Scoping Outline  
for Finger Lakes LPG Storage LLC Watkins Glen LPG Storage Facility  
DEC 8-4432-00085/00001**

Dear Mr. Bimber,

Citizens Campaign for the Environment (CCE) is an 80,000 member non-profit, non-partisan advocacy organization that works to empower communities and advocate solutions that protect public health and the natural environment. CCE appreciates the opportunity to comment on the draft scope of the proposed Supplemental Environmental Impact Statement for the Finger Lakes Liquefied Petroleum Gas (LPG) Underground Storage Facility. CCE requests that future comment periods around this project have at a minimum a 90 day comment period.

In the Positive Declaration that an Environmental Impact Statement should be conducted the DEC describes the project as:

“a new underground LPG storage facility for the storage and distribution of propane and butane on a portion of a 576 acre site. The storage facility will utilize existing caverns in the Syracuse salt formation created by US Salt and its predecessors' salt production operations. As proposed, a maximum of 2.10 million barrels (88.20 million gallons) of LPG will be stored in these caverns seasonally, displacing some of the brine currently filling them, and will be withdrawn by displacement of propane by brine when demand occurs during the heating season and displacement of butane by brine during the gasoline blending season. During storage operations, the brine displaced by LPG will be stored and contained in a 14 acre lined surface impoundment with a capacity of 2.19 million barrels (91.98 million gallons) on the hillside immediately east of the junction of Routes 14 and 14A.”

**In general, CCE is concerned with the proposed underground storage facility.** There have been many cases of leaks and explosions from gas stored in natural caverns. Please

find attached to our comments examples of these catastrophic events, as well as a report by the USGS on the effects of the Retsof Salt Mine Collapse on the Genesee Valley. CCE requests that the applicant address how its proposed project will not end in similar results. CCE believes that the natural tendency for rocks to erode and fracture lends a threat of leakage and poses a direct hazardous threat to the communities around Seneca Lake. There is vibrant tourism, winery, and agricultural industry in the Finger Lakes region. CCE believes it is important to preserve the environment that supports these long-term and sustainable economic drivers in the region.

CCE is opposed to the proposed surface impoundment of brine. Again, as described the Positive Declaration the brine storage is: *"...the brine displaced by LPG will be stored and contained in a 14 acre lined surface impoundment with a capacity of 2.19 million barrels (91.98 million gallons) on the hillside..."* Further, as described in the draft scope, *"An impoundment structure with a maximum height of 50 feet above its down slope toe is proposed to impound a 2.19 million barrel (91.98 million gallons) capacity brine pond on a site with variable slopes in the 8 to 12 percent range. The slope tends to steepen downhill in the area under the proposed impoundment structure. When full, the pond surface will be approximately 400 feet above Seneca Lake elevation, at a horizontal distance from the lake of approximately 2400 feet."* As the DEC is aware, Upstate New York is blessed with abundant wet weather, and surface brine storage is a direct threat to Seneca Lake's water quality, fishing communities, drinking water, and water-dependent tourism and agriculture. **CCE strongly urges the DEC to not permit a surface brine impoundment.**

CCE is specifically concerned with how spills and leaks from the underground storage and brine facility could impact Seneca Lake and surrounding communities, as well as, the potential impact to communities and waters upstream from Seneca Lake would be impacted from the proposed project.

In regards to the proposed scope CCE offers the following additional questions to those already posed by the DEC:

1. What impacts will the proposed brine pond have upon birds and other wildlife?
2. What is the stability of the caverns to hold gas and for how long?
3. How long is it anticipated that LPG will be stored at these sites?
4. What is the applicant's end of project remediation plan?
5. Will the LPG mix with the brine that is not removed from the cavern? If so, how will the LPG be treated and how will the brine be treated to ensure there are no residual petroleum products at end of project?
6. Will displaced brine be re-injected into the caverns? If so, how will that happen and how will that impact cavern stability?
7. Will construction activities impact cavern stability?
8. How will the applicant insure that no leakage of brine, liquid petroleum product, or gasified petroleum products will occur?
9. What is cavern development?

6

10. What is groundwater suppression? How does the applicant propose to use groundwater suppression? How will ground water suppression affect the hydrology of the area?
11. What will applicant do to alert first responders when there is a leak or spill? How will the applicant alert surrounding neighbors?
12. How will the applicant prevent and address water contamination?
13. Subsidence of salt caverns has happened in the area before. Why is the applicant proposing to store LPG in salt caverns? What are the unique geological characteristics that would make these caverns more stable than the ones that have collapsed in the past?
14. How many staff and hours will the DEC invest in enforcing and monitoring pollution prevention plans, including but not limited to – wellhead inspection, brine removal and storage, construction, stormwater controls, LPG injection and removal, pipeline stability, compressor stations, brine reinjection.
15. How will the applicant report spills and leaks?
16. How will the project impact existing uses of the area’s ground and surface water and land?
17. How will seasonal storage fluctuations impact cavern stability?

The proposed draft scope does not address impacts to climate change, air quality, or cumulative impacts. These must be addressed to ensure an adequate environmental assessment.

In conclusion, CCE has grave concerns with the proposed storage facility. CCE believes that before permit can be granted the applicant must prove that its activities will not adversely impact the environment or public health.

Respectfully Submitted,

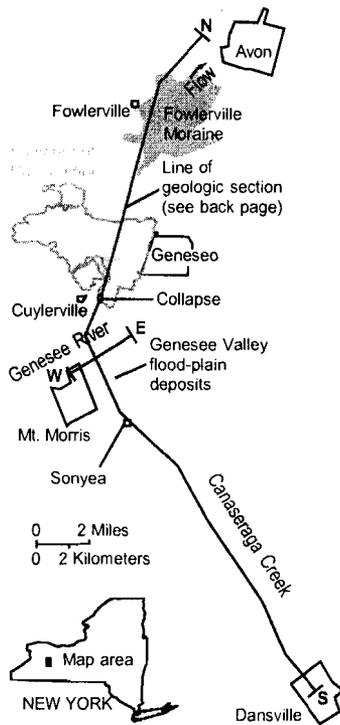
Sarah Eckel  
Legislative Director  
Citizens Campaign for the Environment



## Effects of the 1994 Retsof Salt Mine Collapse in the Genesee Valley, New York

An apparent earthquake of magnitude 3.6 (Richter scale) centered near Cuylerville, N.Y., woke residents on March 12, 1994, at 5:43 a.m. and was detected by seismographs 300 miles away. The U.S. Geological Survey National Earthquake Information Center confirmed that a seismic event had occurred near Cuylerville. The Livingston County Sheriff's Department asked the Retsof Mine whether the earthquake could have resulted from mining activity. Mine personnel reported that they had not heard anything, nor felt any unusual ground motion, nor had they detonated any explosives that weekend. Retsof officials

examined the mine and discovered that a 500-by 500-foot section of shale ceiling rock had collapsed some 1,200 feet below land surface, in the southern part of the mine. Methane and hydrogen sulfide gases were escaping, and ground water was flowing from the collapsed ceiling into the room. The mine, which had been in operation since 1885, had always been dry previously. This initial collapse was followed by another collapse and complete flooding of the mine, large ground-water level declines, and land-surface subsidence that affected many structures, roads, and utilities in this part of the Genesee Valley.



A roadbed fractured above the mine collapse area.

### History of the Mine

The Retsof Mine was founded in 1885 as a vertical shaft was excavated to a layer of rock salt about 900 feet below land surface. During the next 110 years, this mine became the largest salt-producing mine in North America and the second largest in the world. Before the collapse in March 1994, the mine encompassed an underground area of more than 6,000 acres—nearly 10 square miles.

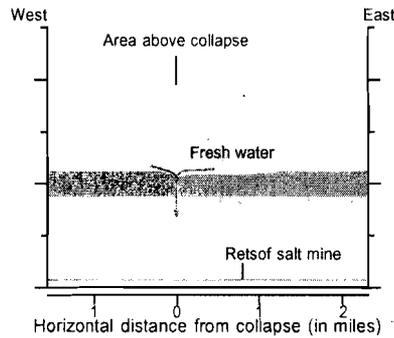
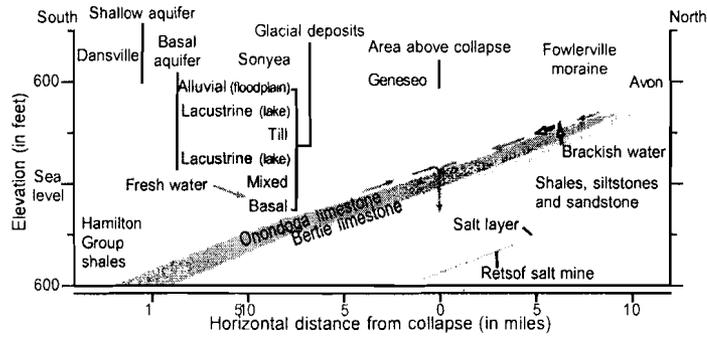
During the 17 months following the initial collapse, mining operations were shifted to the northern part of the mine in an attempt to salvage mineable salt before the entire mine became flooded. Mining operations ceased on September 2, 1995, and the mine was completely flooded by December of that year, 21 months after the initial collapse.

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### Hydrogeology of the Genesee Valley

The Genesee Valley study area includes the Canaseraga Creek Valley from Dansville north to Mt. Morris, and the Genesee River Valley from Mt. Morris north to Avon. The Genesee Valley was formed by preglacial stream and glacial erosion of sedimentary bedrock that dips southward at about 42 feet per mile. The bedrock floor of the Genesee Valley consists of Hamilton Group Shales from Dansville north to near Sonyea; from there north to Fowlerville, it consists of Onondaga Limestone (see cross sections on back page). As much as 750 feet of unconsolidated sediments were deposited in the valley by glacial processes and another 50 feet of gravel, sand, and silt have been deposited on top of the glacial sediments by valley-floor and tributary streams since the glaciers receded about 12,000 years ago.

The principal aquifer system in the Genesee Valley is confined below the lacustrine (lake) deposits. A 10-foot-thick sand and gravel aquifer lies just below the lacustrine deposits, and a 10- to 40-foot-thick basal sand and gravel aquifer directly overlies the Hamilton Group shales in the southern part of the valley and the Onondaga Limestone in the central and northern parts. The hydraulic connection between the basal aquifer and the underlying bedrock units throughout the valley is poorly documented but is probably greatest in the northern half of the valley. The basal sand and gravel aquifer and water-bearing fractures in the Onondaga and Bertie Limestone bedrock are the major sources of ground water that flooded the Retsof Mine.



**Hydrogeologic Effects of the Collapse**

The hydrogeologic effects of the mine collapse and the subsequent dewatering of overlying aquifers in the valley include, but are not limited to: (1) the loss of potable ground-water supplies through lowered water

• **Ground-water level declines**- After the mine collapse, water levels declined in several domestic wells along the edges of the Genesee Valley, and in wells that tapped the deeper aquifers. Shallow wells that tapped the unconfined alluvial aquifer were unaffected. The rate of water-level decline varied locally; for example, water levels declined 20 feet or more along Wheelock Road (about 1 mile south of Cuylerville) within 5 days of the

• **Subsidence**- Land subsidence caused by the collapse has resulted in the formation of two large (about 200 feet wide and 50 feet deep) sinkholes and the collapse of the State Route 20A bridge near Cuylerville. Several homes and barns, as well as agricultural lands and public utilities, were damaged by subsidence. In addition to the formation of 2 large sinkholes above the mine's southern end as a direct consequence of the March and April 1994 collapses, subsidence from three other causes has occurred in the valley:

1. *Subsidence due to the slow but steady closure of the mine opening.* This process generally occurs above any mined-out area, and mining engineers expect the land surface above the Retsof Mine to subside 8 to 9 feet over the next century or two. Differential (nonuniform) subsidence is expected along the margins of the mine, where stresses from adjacent subsidence may create enough tension to rupture the subsurface or surface. Horizontal movement and tilting of the land surface in the direction of the mine also can be expected in these areas. These areas may continue to be prone to structural damage over time.
2. *Subsidence due to the dissolution of remaining salt.* Engineering reports indicate that the magnitude of subsidence in the area of

• **Release of natural gas from the aquifer**- Soon after the mine began to flood, the decline of water levels in the basal aquifer allowed natural gases (hydrogen sulfide and methane) to escape from the depressurized ground water, just as carbon dioxide gas comes out of solution, forming gas bubbles, when a bottle of carbonated soda is first opened. These gases

levels in wells, (2) short- and long-term land subsidence, and (3) impaired air quality as a result of the release of methane and hydrogen sulfide gases.

collapse, a decline of more than 100 feet was reported in one well in Mt. Morris during the next 2 months, and declines of 50 feet or more were reported in the Fowlerville area during the next 6 months. The largest water-level decline-greater than 400 feet-was reported near the mine-collapse area. The loss of water from the basal aquifer to the mine affected water levels within 10 miles north and south of the collapse area.

rapid freshwater inflow to the mine was greater than expected, and that the rate of subsidence was much greater than would be seen in a dry-mine situation. This type of subsidence, although rapid, progressed only in the area of freshwater inflow. Once the mine was filled with saturated saltwater, no new freshwater entered, and all subsidence of this type quickly decreased.

3. *Subsidence due to the rapid lowering of ground-water levels in the principal aquifer, followed by a slow recovery.* This type of subsidence is due to the compaction of fine-grained layers generally within the confined aquifer below the lacustrine unit as ground water is drained, causing the removal of buoyant support between the individual silt and clay particles. Although this process caused a much smaller degree of land subsidence than the previously mentioned processes, the large declines in ground-water levels after the collapse were enough to cause some measurable elastic and inelastic compaction (consolidation) of the sediments, and this compaction resulted in small-scale land subsidence within an area larger than the underlying mine. This subsidence was greatest in areas where the fine-grained sediments are thickest.

escaped from test wells near the collapse, from some domestic wells along the eastern valley wall, and at land surface from fractures in the bedrock near the northwestern part of the mine. The gases were flared-off (burned) at several wells to reduce the odor and protect the health and safety of nearby residents.

## USGS Efforts

The collapse of the Retsof mine has caused major changes in the ground-water-flow system of the Genesee Valley. During the first few weeks of the mine collapse, the USGS provided hydrogeologic expertise to State and local officials as they assessed the immediate consequences. The USGS also assisted in developing a ground-water level monitoring network, collected surface- and borehole-geophysical data to characterize the hydrogeologic framework of the valley, and recently developed a numerical model of ground-water-flow in the aquifer system to simulate drainage of ground water into the mine and the

recovery of water levels in the aquifer. The model is based on data supplied by Livingston County, State agencies, consultants, and the local citizens' Technical Assistance Group, as well as that collected by the USGS. The model is being used to delineate areas affected by water-level declines and to estimate the time required for the ground-water system to return to pre-collapse conditions. Model results will also be used to identify the factors that control the rate of drainage and recovery of the aquifer system, and the areas where additional hydrogeologic data are needed to improve the accuracy of the model.

by William M. Kappel, Todd S. Miller, and Richard M. Yager

## Sources of Technical Information

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For More Information contact:

Subdistrict Chief  
U.S. Geological Survey  
903 Hanshaw Road  
Ithaca, N.Y. 14850

This fact sheet can be found on the WorldWide Web at: <http://ny.usgs.gov>

**From:** Lynn <lthirion@primetprecision.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 12:56 PM  
**Subject:** Comments on LPG Storage in Salt Caverns  
**Attachments:** SaltCaverns&LPG-DECLetterMS1-28-11.doc

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Dear Mr. Bimber,

Please see my attached letter concerning the issue of LPG storage above Seneca Lake.

--  
Lynn Thirion  
Senior Process Technician

Primet Precision Materials, Inc.  
950 Danby Road  
Suite 204  
Ithaca, NY 14850

Tel: 607.277.0700, ext. 217  
Fax: 607.277.1530  
E-mail: lthirion@primetprecision.com  
Web: www.primetprecision.com

**TO: David Bimber**, Deputy Regional Permit Administrator, New York State  
Department of Environmental Conservation

**RE: PUBLIC COMMENT on FINGER LAKES LPG STORAGE (INERGY)  
request for approval to store LPG in salt caverns near Watkins Glen on the western  
shore of Seneca Lake**

Dear Mr. Bimber:

I have just been made aware of the plans by Finger Lakes LPG Storage, LLP, and its parent company, Inergy, to store LPG in salt caverns almost right upon Seneca Lake. The plan includes connection to an existing interstate pipeline; the construction of a 14-acre surface pit on the hillside above Seneca Lake to hold 2 million barrels of displaced brine; storm-water control structure; compressors; a new rail- and truck-transfer facility; and LPG storage tanks; buildings; and the use of the caverns as storage of this highly dangerous and toxic liquid fuel.

My husband and I live just South of Seneca Lake and Watkins Glen. We are sickened to learn of the plans to install this facility and hope it will not be permitted. It will surely destroy much of what we love about the area, and keep us from bringing our dollars, and those of our frequent out-of-town guests, there to spend. The noted truck traffic on our two lane State Rt. 14 has already made a significant impact on our lives. We are able to count 75 to 100 propane tankers daily, 7 days per week travelling through our 30 mile per hour Village at speeds greater than this. Where are they all going now???

Basic common sense and caution lead me to believe there are potentially horrific consequences to such a project. I am writing to request

1. That DEC share the full "Reservoir Suitability Report" with the public and give us 90 days in which to review it and comment upon it. You should not accept any "trade secrets" or other excuses from Inergy or other involved company. This is our drinking water, our lake, and our health, being placed in potential jeopardy.
2. That DEC insist upon a full Environmental Impact Study of this project as well as a Public Health Impact Study and Community Economic Impact Study, all to be undertaken at the expense of Finger Lakes LPG Storage and Inergy or other parent/sibling companies. Among the items that should be studied:
  - a. Impact of increased truck and possibly rail traffic on roads, air pollution, land pollution, and noise levels. This should include the cost of increased health care from asthma and other respiratory ailments and the potential damage from volatile organic compounds released from the additional traffic on people, farm animals, and crops; and the cost of road repair and maintenance, which will be borne by taxpayers and municipalities.
  - b. Cost of lost tourism revenue; the potential impact on agriculture, wineries, and our food supply; and the likelihood of further industrial development tied to the use of gas byproducts (for example, in the manufacture of plastic and plastic-based goods).
  - c. Noise impact on people and animals from the nonstop compressor station.

d. Security, which should be redundant times three, of the containment areas for brine and the liquid fuels. Our region's geology is full of fractured, jointed rock formations with many small fissures and faults, and the LPG can easily migrate from the storage area. There must be a triple-ensured system in place that will not allow any such thing to happen, especially in case of earthquakes (of which we have experienced quite a few in my own memory).

e. Impact of spills on our watershed and especially on Seneca Lake. There is no doubt that spills will happen. There is no way around this. How much is DEC willing to permit? How will you share this information with those who live in this area and are affected by your decision? How can we protest if you decide in what we consider to be an irresponsible manner?

f. Human error is part of life. Equipment fails. How can you ensure that we ourselves and our water, air, land, and nature are protected?

g. Cost of increased firefighters, emergency responders, and hazardous materials experts to respond in the event of explosion and fire. This cost should not be passed onto local communities and taxpayers but covered by the company/companies that want to do business here.

h. Insurance. Who will insure these companies against accidents, explosions, spills, damage to health and the environment, damage to county- and municipality-run roads, bridges, infrastructure? Who will insure local homeowners, landowners, farmers, and passersby? Who will pay these insurance costs?

i. What impact will there be on our surface water, aquifers, and Seneca Lake?

j. What can happen with brine pit failure?

k. What will happen with naturally occurring radioactive material, which might be picked up from belowground and brought up to the surface? What health hazards are possible? How will Inergy pay to protect people from potential radiation hazards? How will DEC or other agency monitor this?

l. Inergy and its subcompanies should be made to grant full access to this facility to DEC, to other state agencies, and to local and national agencies. The public should also have full access to all reports of accidents, spills, faults, leaks; daily NORM, air, soil, and water VOC counts; and even false alarms.

m. Inergy and its subcompanies should pay into a "superfund" at least as much annually to accumulate within five years what your Study shows might be needed in case of a catastrophic failure.

These are just a few of our questions and concerns that should be included in the DEC study. I hope and expect to hear from you in response.

Respectfully submitted,

Lynn & Christian Thirion  
2011 Maple St.  
Millport, NY 14864

**From:** Anna Stratton <mecklenburg.angel@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 1:48 PM  
**Subject:** Public comments on proposed brine storage (see attachment)  
**Attachments:** LPG storage public comment letter.doc

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Dear Mr. Bimber,

Thank you for your time in reading the attachment to this letter.

I'd like to ask: What happens if we get enough rain to flood the proposed brine pond? You might have lived through the floods of Hurricane Agnes in 1972, to see first-hand how much water can fall from the sky, uncontrollably, in a short amount of time. Unless this 14-acre brine pond is enclosed in a dome of sorts, will it overflow and cascade industrial chemicals down to Seneca Lake and cause a massive fish kill, like the creeks in Dimock, PA? And if that sort of disaster could happen, who would be responsible for cleaning up the mess over the next couple decades? The taxpayers? That's one sure way to dig ourselves into a deeper economic hole. If an industry 'mistake' should occur, I'd like to be assured that the people AND the lakes of our area are 100% protected, in the environmental impact statement.

As a resident of this beautiful area, I have no interest in compromising these surroundings to help make out-of-town gas companies rich. Hydrofracking just south of us in Pennsylvania has given us a plethora of horror stories already. We are simply a commodity to these billionaire companies, and we'll be the ones that have to live with the environmental deterioration that this new drilling industry may bring. Thank you, Mr. Bimber, for your attention to conserving, improving, and protecting our vital natural resources.

Sincerely,

Anna Stratton

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Jan. 31, 2011

Mr. David Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
[dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)

Dear Mr. Bimber,

I am deeply concerned about environmental issues related to the proposed project to store LPG in the salt caverns near Watkins Glen and hope the following issues will be fully addressed in the upcoming Environmental Impact Statement from the DEC:

1. Because the site is close to Seneca Lake, I am concerned about protection of Seneca Lake from pollution from surface contamination from the brine-holding tank and pollution from underground water contamination due to leakage or loss of cavern integrity.
2. I am concerned about ground and water pollution that can negatively influence agriculture, especially the wine industry in that area.
3. I would like to know the plans for managing increased truck and rail traffic in Watkins Glen on Rt. 14 and 14A and over the Watkins Glen Gorge railroad bridge.
4. I would like to know about plans to control noise pollution at this site that is in a rural and tourist area.
5. I am concerned about an unsightly industrial 14 acre brine pond and a rail and truck loading facility in a visually beautiful tourist area

Thank you for addressing these concerns in the draft Environmental Impact Statement. I hope the public will be better informed in the future than we have been up to now.

Anna Stratton, Schuyler County Landowner  
4516 McIntyre Rd  
Trumansburg, NY 14886

January 31, 2011

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**Memo**

**To: NY DEC to: David Bimber, Deputy Regional Permit Administrator,  
[dlbimber@gw.dec.state.ny.us](mailto:dlbimber@gw.dec.state.ny.us)**

The New York State Department of Environmental Conservation (DEC)  
[deprmt@gw.dec.state.ny.us](mailto:deprmt@gw.dec.state.ny.us)

From: Dr. Jean Spooner, [jean\\_spooner@NCSU.EDU](mailto:jean_spooner@NCSU.EDU)  
Home owner, 3685 Shingle Point Rd, Himrod, NY

Mailing address: 2401 Trinity Farms Rd, Raleigh, NC 27607

**Re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (DSEIS)  
- DRAFT SCOPING OUTLINE  
Finger Lakes LPG Storage LLC  
Watkins Glen LPG Storage Facility  
DEC 8-4432-00085/00001**

Please accept this memo as part of the public input on the scope of the above referenced DSEIS for the proposed **Watkins Glen LPG Storage Facility**.

**Please inform me when the draft EIS is available for public review.**

We are very concerned about the impacts of failure of brine pond, as well as the underground storage facility and its associated transport systems. We also have concerns about the various and potentially detrimental secondary impacts. This is an area where a large amount of ground water is used for drinking and agricultural use, as well as extensive use of the water resources of Seneca Lake itself.

Specifically, we would like to see added to the scope of the draft EIS the following sections:

1. The **SOURCES and LOCATIONS of the LPG** that is proposed to be stored. This will highlight the potential source and transport environmental issues. This information should include:

- The estimated quantities of LPG that would originate for each of various locations (local and remote), this should be provided on a subwatershed scale (e.g., USGS HUC 12, **Hydrologic Unit Codes scale**).

- The anticipated schedule of sources from each of these source locations. E.g., volumes per year for the next 100 years.
- The methods of extraction (e.g., fractionation) planned at EACH of the source locations – for any surface or ground water drainage area to Seneca Lake or other Finger Lakes, this should be provided at the HUC 12 or smaller scale level.
- The potential local and regional environmental impacts from each of these source location extraction methods.

2. The methods (explicit piping types and locations, surface transportation, etc) that will be utilized to bring the LPG To the proposed storage facility AND to pipe and transport it to market. It is extremely important that ALL methods and locations of ‘filling up’ and ‘discharging’ the proposed storage facility be specified. These piping, pumping, and transportation systems and each potential source of failure and environmental impacts be evaluated. Pipelines, pumps, and tankers FAIL – their locations and environmental impacts all need to be explicitly specified and evaluated.

3. EXPLICIT design, location, and potential failure modes for the proposed 14-acre lined surface pond on the hillside above Seneca Lake, with a capacity to hold 2 million barrels of displaced brine. This should include not only ‘routine’ operation of this facility, but also potential minor and catastrophic failures of this facility. Also, include any potential surface and ground water quality and quantity impacts within 500 ft, 1000ft, 2000ft, 1-mile, 2-mile, 3-mile, 5-mile, 10-mile, and to Seneca Lake itself.

4. EXPLICIT design, location, and potential failure modes for all storm water control structures. This should also include the environmental impacts, local and regional fir minor and catastrophic failures.

5. Water supply and quality: Impacts to ground water and aquifers – ground water table depth and ground water quality (including any potential for localized changes). This should include potential for local and regional contaminations. This should also include the interaction (via draw-downs or artificial storage) with the various high sulfur content substrata that could degrade local well water supplies. This information needs to be provided at both regional and local scales. All this information needs to be provided for short distances for each part of the facility and its associated components; as well as at the HUC 12 subwatershed scale.

6. Water supply and quality: Impacts to surface waters. This should include potential for local and regional contaminations. This should also include any potential interactions between surface and ground water. All this information needs to be provided for short distances for each part of the facility and its associated components; as well as at the HUC 12 subwatershed scale and to Seneca Lake.

7. The location of ALL components of this proposed storage facility. And, a delineation of ALL the lands currently under ownership by ANY and all gas supply companies in the drainage area to Seneca Lake, as well in the Finger Lakes region. AND, the delineate of all potential future

owners of lands. This should include the mining and mineral rights under private properties. This should also include a detailed description of the use for EACH of these parcels. The level of detail should be at the parcel and Tax ID level. Complete operational information of associated land management is required to be able to evaluate the full environmental impact of such a proposed facility with regional consequences.

8. The quantity of water (surface and groundwater), as well as their source water locations for ALL operations pertaining to the source acquisition of the LPG, transport and storage of the LPG, and delivery to market needs to be explicitly and quantitatively delineated. This needs to be in units of gallons of water from each water source for specified years (at a minimum in 5 year increments for the next 100 years). It needs to at a scale detail no larger than HUC 12.

9. Detailed reclamation plans need to be included. The environmental consequences are not only during active management – but, as we know too well from various sites around the county – during the post-production period.

10. A detailed plan regarding environmental clean-up or reclamation in the events of minor and major failures.

11. A detail action and financial plan in the event of the company or other financial/market troubles.

12. All the issues asked to included in the draft EIS should be addressed in detail at the local (in feet) level, subwatershed (no larger than HUC12), and regional level.

**David Bimber - Re: Draft EIS Content, proposed Watkins Glen LPG Storage Facility, DEC 8-4432-00085/00001**

**From:** Jean Spooner <jean\_spooner@ncsu.edu>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 2:05 PM  
**Subject:** Re: Draft EIS Content, proposed Watkins Glen LPG Storage Facility, DEC 8-4432-00085/00001  
**CC:** <deprmt@gw.dec.state.ny.us>

An additional request for the draft EIS content: PLEASE HAVE THEM PROVIDE ALL MATERIAL IN AN ELECTRONICALLY AVAILABLE FORMAT, PDF'S. INCLUDING ALL THE CAD AND DESIGN GRAPHICS.

THANKS, JEAN

Jean Spooner wrote:

**January 31, 2011**

**Memo**

**To: NY DEC to: David Bimber, Deputy Regional Permit Administrator,  
dlbimber@gw.dec.state.ny.us**

The New York State Department of Environmental Conservation (DEC)

deprmt@gw.dec.state.ny.us

From: Dr. Jean Spooner, jean\_spooner@NCSU.EDU

Home owner, 3685 Shingle Point Rd, Himrod, NY

Mailing address: 2401 Trinity Farms Rd, Raleigh, NC 27607

**Re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT  
(DSEIS) - DRAFT SCOPING OUTLINE**

**Finger Lakes LPG Storage LLC**

**Watkins Glen LPG Storage Facility**

**DEC 8-4432-00085/00001**

An additional request for the draft EIS content: PLEASE HAVE THEM PROVIDE ALL MATERIAL

4

IN AN ELECTRONICALLY AVAILABLE FORMAT, PDF'S. INCLUDING ALL THE CAD AND DESIGN GRAPHICS.

THANKS, JEAN

--

dR. Jean Spooner  
Director, Soil & Water Environmental Technology Center  
NCSU Water Quality Group  
Biological and Agricultural Engineering Department  
North Carolina State University  
Box 7637  
Raleigh, NC 27695-7637  
PHONE: 919-515-8240      FAX: 919-515-7448  
INTERNET: [jean\\_spooner@ncsu.edu](mailto:jean_spooner@ncsu.edu)  
WWW: <http://www.ncsu.edu/waterquality>

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**From:** "Daniel C. Hill" <dhill@hetf.org>  
**To:** <depprmt@gw.dec.state.ny.us>  
**CC:** "Daniel C. Hill" <ugieflute@netscape.net>  
**Date:** 1/30/2011 10:46 PM  
**Subject:** Finger lakes,LL C LPG Underground Storage Facility

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Hello, I am writing as the Cayuga Nation Environmental Tech who works also with the Haudenosaunee Environmental Task Force. We are concerned that the proposed project is not going to be monitored and safe enough to keep the watersheds and surface waters safe for future use. Of greatest concern is that the term Brine is used in two meanings. One is the natural occurring salt solutions of the Salt mines planned for storage of the LPG, and the other is the meaning of the produced waters under the name of brine. The produced waters and the introduced waters in the process of Hydro-Fracking are seemingly interchangeable in terms but not definitions, both called "Brine". The Nations and the public have called for the Sharing of the chemicals in these waters so that the public can know what to look for when drinking waters are contaminated. Drinking waters have been contaminated in the Wind River Indian Nation in Wyoming and are from the Hydro-Fracking process. So It is our duty to call on you to make sure that the requirements of this process do not adversely impact the water for future use of all of our children..Dan Hill.

**From:** Donald Webster <dgwebster48@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** mom webster <mfwebster@htva.net>  
**Date:** 1/31/2011 2:48 PM  
**Subject:** gas storage

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Dear Sir,

Please do the best you and your coworkers can to do us justice.

We live in a very beautiful area that relies on the tourist trade mostly.

Most of the residents plan on living here there whole life and wish it to stay a safe and beautiful place to live.

Please do a really good job of investigating this gas storage idea.

Sincerely Don Webster. long time resident. 607-228-0303

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**From:** Carolyn Eberhard <ce11@cornell.edu>  
**To:** <dbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 3:31 PM  
**Subject:** Finger Lakes LPG Storage Project

From: Carolyn Eberhard  
 To: David Bimber, Deputy Regional Permit Administrator, NYSDEC  
 Re: Scoping for dSEIS Finger Lakes LPG Storage Project

Please accept my sincere thanks for requiring an SEIS for this unfortunate and seriously risky project. The proposed siting of a major industrial facility next to Seneca Lake and along the Seneca Lake Wine Trail alone should be sufficient grounds for a detailed SEIS. The risk of salt cavern gas storage has already been demonstrated by a number of catastrophic accidents. Add in the possible failure of the brine impoundment and the risk becomes totally unacceptable.

To paraphrase Prof. Ingraffea: "A corporate business plan is not necessarily a good NYS energy strategy".

Since the SEIS must be developed, however, I would like to add these comments on the Draft Scoping Outline proposed for the dSEIS.

3.0 Impacts: In addition to Land, Water, Transportation Noise, and Visual and Public Safety, the following should be considered:

- \* PUBLIC HEALTH: investigate the cumulative effects of air pollution; this region already has elevated ground ozone levels but trucking will greatly increase them; ozone also impacts agricultural crops, especially wine grapes; asphalt use will have to increase, causing more air pollution; trucks and compressors will emit diesel fumes
- \* WILDLIFE: the brine pond(s) may attract more waterfowl, exposing them to whatever contaminants are brought up with the brine (e.g. radioactivity?); 24/7 traffic and industrial activity will compartmentalize habitats
- \* LOCAL ECONOMY: the truck traffic in a prime summer vacation location would have a negative impact on the tourist economy and downtown Watkins Glen would have a real problem; the Seneca Lake Wine Trail would be impacted, especially in autumn

3.0.2 Executive Summary:

3.0.2/ Significant beneficial and adverse impacts

"The dEIS must be written to a level of detail to properly assess the impacts identified and that allows involved agencies to make a reasoned decision on the action"

Beneficial impacts: There would be no beneficial impacts to the environment  
 If beneficial impacts to the public and private interests are included, the negative impacts need to be included as well.  
 This means that all economic aspects, public health and public safety as well as environmental aspects need to be addressed.

- \* the project is obviously of benefit to FL LPG Storage but the benefits to stakeholders and the people of NYS should be analyzed
- \* discuss how much total storage capacity is already available to FL LPG and others

\* serious and complete economic analysis of assertions by the applicant regarding "more jobs", "more energy", and "more economic activity"

? do the "energy need" claims match the actual predictions for NYS

? Where will the trucks and truck drivers come from - in PA

loss of truck drivers to gas drilling has negatively impacted other economic activities such as dairy trucking

? What is the real benefit to the Norfolk and Southern Railroad of the Watkins Glen Gorge trestle collapses

Granting a permit to build infrastructure for possible future use is irresponsible and self-fulfilling unless a reliable projection of future need is made by independent economists. Ironically the Norfolk Southern Corp. has recently "announced a five-year goal to reduce its carbon footprint through fuel-savings technology and improvements in operating efficiencies", whereas this project will result in the release of more greenhouse gases and diesel fumes.

### 3.0.2/ Alternatives considered

Other Finger Lakes LPG Storage facilities may suffice at this time. What role is planned for the (former) NYSEG Seneca Lake Storage Project facility abandoned by NYSEG (April 2010)? This project was originally permitted with basically no economic analysis and was claimed to be necessary as a buffer for supplying natural gas to (seriously depressed) Binghamton via the Seneca Lake Storage Project Phase II pipeline along Rt. 96 B. Now it is no longer needed by NYSEG demonstrating that the supposed necessity was not valid. The 3rd compressor was requested immediately on completion of the project (~1995) but was allowed only after Carbon Offset for the compressors' CO2 production was required, since no evidence of need was demonstrated and it would benefit only NYSEG's bottom line.

The consequences of denying this FL LPG permit should be analyzed as well.

### 3.0.3 Purpose and need for the proposed action

SEE ABOVE - The claim that this project is needed whether or not Marcellus Shale gas drilling is allowed in NYS should be examined in detail. If drilling is not allowed, there is considerable storage capacity already in place in PA for natural gas and LPG storage may also be sufficient. If that is the case, need is just not there.

3.1.1 ? What about the dam permit Why is it not required for a 50 ft. impoundment with a highly sensitive downslope target

### 3.1.2 SEQRA

? Is the 1992 GEIS sufficiently detailed on LPG storage to cover this project

This is storage, not a well, but this project will clearly support well drilling. However, the GEIS of 1992 preceded HV hydrofracking; so it IS necessary to address issues of well drilling, conversion, capping and impacts unless a revised, final GEIS is in place to cover these issues.

## 4.0 Environmental setting

### 4.1.1 Ecological Resources

Since the point of the project is irreversible consumption of fossil

fuels (LPG) that needs to be discussed in relation to the energy policy and greenhouse gas emissions policy of NYS

4.1.1.1 Existing fauna is not sufficient - fauna attracted to a brine pond need to be included, since it is a significant alteration to the existing environmental setting

4.1.1.2 Address the addition of the brine pond habitat as well as habitat loss

4.1.2.2. ?Where are the soils coming from and how will that habitat be affected

4.1.2.3 ?What if the low level brine pond freezes up in the winter ? Is the liner material approved for extreme freezing temperatures

4.2.1.3 Also analyze the safety record of the applicant; record of mitigation of possible accidents  
Specify life time of the liner

4.3.1 Include the noise impact of the compressors which should be required to use BAT for noise and emissions

4.5 The existing facility is claimed to be visible from across the lake (Burdett?), so even the present visual impact could be mitigated

5.0 Alternatives to the proposed action  
?What are the consequences to NYS stakeholders of abandoning this project  
No action should be included as an alternative

6.0 Irreversible and irretrievable commitment of resources  
Refers to the list in Section 4, which does not yet include LPG, consumption of which is the point of this project

7.0 Growth Inducing Aspects: If this facility is permitted and constructed, it will not be going away. One more piece of natural NYS will be lost forever and further encroachment by such facilities will be encouraged

Thank you for your time and good luck with the dEIS.

Carolyn Eberhard  
(Former) Member of the Coddington Valley Association  
Finger Lakes Land Trust Grantor

--  
Carolyn Eberhard ce11@cornell.edu 2434 Coddington Rd.  
HOME: 607-659-7085 Brooktondale NY 14817  
SUMMER: 508-540-7346 230 Sippewissett Rd. 6-15 to 10-15  
CELL: 607-229-0895 Falmouth MA 02540

73

**From:** Jeremy Alderson <radio@lightlink.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 4:12 PM  
**Subject:** PUBLIC COMMENTS RE INERGY FINGER LAKES LPG STORAGE

Dear Mr. Bimber,

I believe a reason not to approve the Inergy plan for Finger Lakes LPG storage may today be seen, with uncertain outcome, in the streets of Cairo. Do we want that level of domestic discontent here? What is being stored in America that is potentially far more explosive than LPG is the building sense of resentment that we, the people of this country, get nothing, unless you count the shaft.

This salt dome LPG storage project has been peddled through a remarkably shoddy process. A big corporation held one "Public Hearing" in the Town of Redding with little fanfare. Inergy chose a procedure clearly designed to deny the people the opportunity to give their informed consent, but they have not similarly insulated the people of the Finger Lakes from risks to our way of life, our survival and the survival of our children.

I appeal to the DEC as the people's representative. If there is any Public Hearing requirement at all, if there is a mandate for the DEC to consider this matter at all, it is because it has been determined that this is a matter about which the people should have a say, but we the people of the Finger lakes, have not yet had our say. This matter should be decided at the thoughtful pace required for public deliberation not rocketed forward by the lust for profits of a corporation that has already shown its disdain for the public good.

I request that the DEC, as the defender of the public interest, insist upon full disclosure, complete studies, and a comment period that actually invites the public to give its informed opinion of this project.

Sincerely,

Jeremy Weir Alderson

**From:** "Phyllisa DeSarno" <pdesarno@cityofithaca.org>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 4:51 PM  
**Subject:** PLEASE, DO NOT store LP gas near Watkins Glen/Seneca Lake

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Dear Mr. Bimber,

I have been a life long resident of Watkins Glen in Schuyler County. It is so lush with natural resources and beauty that it was once called "Little Switzerland" in the promotional pieces that were printed back in the 1800's. The truck traffic has become unbearable through our little towns and especially bad through downtown Watkins Glen and along the lakefront. Both Route 14 and 414 along the east and west sides of Seneca Lake have thunderous truck traffic 24 hours per day!!!

Everyday I travel back and forth from Watkins Glen to Ithaca for my position here. I work on committees for both communities and feel very strongly about this region. I have heard many people complain about the truck traffic and the negative effect it has on our air quality, our roads and bridges. If we are going to remain a viable tourism destination, we cannot continue with the onslaught of tractor trailer traffic.

Our beautiful community has been getting a lot of tourism attention in all kinds of publications, due to our State Park, natural waterfalls, Seneca Lake, wineries, and fine eateries. The new Watkins Glen Harbor Hotel has helped bring the much needed overnight guests and our B&B owners are claiming to have the best year ever in 2010.

While the rest of the U.S. is struggling with the economy, Schuyler County seems to be weathering the financial storm pretty well. Again, this is because of the many travelers who have discovered the incredible beauty of the Finger Lakes Region. The potential for our area is boundless, if it remains pristine and natural. However, with this horrible threat of LP gas storage in the salt caverns nearby....all could be lost for our beautiful area.

Please, do not allow storage of LP gas anywhere near the beautiful and bountiful Watkins Glen/Seneca Lake Region.

Sincerely,

Phyllisa DeSarno  
Economic Development Office  
City of Ithaca  
108 E. Green Street  
Ithaca, New York 14850

Home address: 150 Chestnut Lane  
Watkins Glen, New York 14891

**From:** Kate Bartholomew <KBARTHOL@wgcsd.org>  
**To:** 'David Bimber' <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 5:03 PM  
**Subject:** Finger Lakes LPG comments  
**Attachments:** Finger Lakes LPG Storage Draft Scope Outline Comment.doc

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Dear Dave,

Many, many thanks for all the hospitality last Wednesday when Jack and I came up with the scanner and laptop. It felt like a reunion! I felt guilty taking up so much of your time and Roger's given all the work you both must have on your plates with the DEC cuts and all.

Anyway, here are my comments on the Finger Lakes LPG Storage Facility on behalf of the Schuyler County EMC. I'll send up a hard copy along with a disc of the materials I scanned in so you'll have them on file.

Hope you don't get snowed in over the next few days.

All the best,

Respectfully,

Kate Bartholomew  
Watkins Glen High School Science Teacher  
607-535-3210 ext. 7370  
Chair, Schuyler County Environmental Management Council  
607-228-7371  
Please note that my email address will be changing to kbarthol@wgcsd.org

1



# Schuyler County Environmental Management Council

323 Owego Street, Unit #5  
Montour Falls, NY 14865

Phone (607) 535-7161  
Fax (607) 535-6813

January 31, 2011

Mr. David L. Bimber, Deputy Regional Permit Administrator  
Region #8, New York State Department of Environmental Conservation  
Division of Environmental Permits  
6274 East Avon-Lima Road  
Avon, NY 14414

Dear Mr. Bimber;

The Schuyler County Environmental Management Council (hereafter referred to simply as the Council) welcomes the opportunity to comment on the Draft Scoping Outline for the Draft Supplemental Environmental Impact Statement (DSEIS) Draft Scoping Outline for the Finger Lakes LPG Storage LLC Watkins Glen LPG Storage Facility DEC 8-4432-00085/00001 issued January 5, 2011. The Council applauds the DEC for its issuance of a Positive Declaration, recognizing the inherent risk of adverse environmental impact this project poses.

It is the opinion of the Council that several aspects of the project warrant greater scrutiny than indicated they will receive in the Draft Scoping Outline. These concerns are as follow:

1. **The Proposed Brine Storage Pond.** The Council questions the adequacy of the eastern down-slope impoundment berm to withstand the weight and pressure of 2.19 million barrels of brine, enduring any number and intensities of storm events, seasonal freezing and thawing, erosion, etc. The Council feels the structure should be subject to NYS Dam Safety Regulations at the very least, or, ideally, relocated to a parcel less sloped and dived into two to three ponds.

The results of a catastrophic failure of this brine storage pond to the lands immediately surrounding it, including several vineyards, would be devastating. The Council also wants to know what provisions exist to protect wildlife from falling in/landing on the pond and being sickened by the brine.

2. **The Underground Storage Caverns.** It is the Council's opinion that relying on publically available information and historical records is far too inadequate to ensure the safety of these caverns for storing liquefied petroleum. A thorough and complete – and independent – geological assessment of the bedrock stratigraphy and faulting patterns of the Seneca Lake area need to be undertaken to determine the extent to which connectivity may exist between the salt cavern and the salt formation lying beneath the silt filling the bottom of the lake.
3. **Surface Water.** The Council still questions whether or not the surface and storm water runoff from this project site is in any way connected to the doubling of the SPDES Permit Volume for U.S. Salt, also owned by Inergy, Inc. Regardless, the Council questions the adequacy of the surface water mitigation plans as outlined in the project plans.
4. **Increased Truck Traffic.** It is the Council's opinion that this project will result in serious deleterious impacts to public safety and quality of life in the vicinity of the project facility due to increased truck traffic. This will increase levels of air (ozone) and noise pollution, and the volume of heavy truck traffic, especially during summer tourist season, or winter weather conditions, can result in greater numbers of accidents.
5. **Railcar Transport.** It is the firm belief of the Council that a number of trellises and underpasses on the rail line proposed as one method of delivery for LPG into and out of the storage facility are overdue for much-

needed repair and currently structurally insufficient to meet the demands of prolonged and regular usage on the scale this project suggests.

6. **Ecological Resources.** While the Council is appreciative Finger Lakes LPG Storage LLC's intention to landscape as a means to improve aesthetics and mitigate both light and noise pollution, the firm's choice of plantings must be strictly limited to native species. At least one suggested planting – Russian Olive – is a highly invasive, nuisance, non-native species.

Finally, the Council wonders if, at any stage during the development of this application and permit process, the applicant has justified, from a market stand point, the need for this facility, given its acquisition of several other similar facilities immediately adjacent to this location, and if so, what that justification is.

As always, many thanks for your time and consideration of these comments.

On behalf of the Council,  
Respectfully,

*Kate Bartholomew*

Kate Bartholomew, Chair  
Schuyler County Environmental Management Council  
607-228-7371; kbarthol@wgcsd.org

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**From:** Laurie Roe <roelaur@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 8:51 PM  
**Subject:** comment on draft scope on New Underground LPG Storage Facility in Reading, NY

January 31, 2011

From: Laurie A. Roe

To: David Bimber, Deputy Regional Permit Administrator, NYSDEC

Dear David Bimber,

Finger Lakes LPG Storage, a subsidiary of Inergy Liquid Propane of Kansas City, Mo., is seeking Department of Environmental Conservation approval to store up to 2.1 million barrels, or 88.2 million gallons, of LPG in the salt caverns above Seneca Lake in Schuyler County. I am writing to comment on concerns I have for the draft scope of the EIS for this project.

I am a resident of the Finger Lakes and have lived here almost all of my life.

I have numerous concerns regarding this project that need to be addressed in the draft EIS required for this project. However, my final conclusion is that this project should not go forward for the following reasons.

The long term economic health of this area, the Finger Lakes, depends on agriculture, tourism, and wineries and renewable energy such as small hydroelectric plants and wind projects. . An industrial plant on the shore of one of the jewels of this lake district, voted the #1 lake district to visit in the world by a renowned travel service, is not conducive to the business ventures that support agriculture and tourism. The huge increase in truck traffic and rail traffic, air and noise pollution from the trucks, are destructive to the existing economic base. More importantly we need to be moving towards renewable energy sources and not investing resources in fossil fuel. Natural gas has a carbon footprint, cradle to grave, likely as bad as coal. And methane is a much worse greenhouse gas than carbon dioxide. The ground level smog, ozone, created from the diesel exhaust of the truck traffic, is not only going to exacerbate any respiratory illnesses of residents but also it is destructive to growth of crops including grapes.

I would like the brine pond, if this project must go forward, to be a very safe distance from the lake. The proposed site of the pond seems to require a dam construction and to have a dam permit issued. The suggested siting of the brine pond right on the brink of the lake is a risk not worth taking. What are the requirements for testing the pipes that will be used in this project? I do not want to company profiting from this enterprise the only company testing its pipes or other aspects of its infrastructure.

What is the evacuation plan for the town of Watkins Glen, with its thousands of tourists every summer, if a disaster occurs, which is readily found in the history of salt cavern storage of lpg?

Methane and other gases from some of the shale formations in the Northeast are known to be sometimes highly radioactive. What is going to be done to test and monitor the radioactivity of these gases?

What about the 75 year old trestle bridge that goes over the Watkins Gorge and would be carrying the increase of rail traffic?

What is known about the geology of these salt caverns, and their suitability for longterm storage of highly pressurized lpg?

What studies are done to understand the effects of the increase of traffic on the lives and businesses of the residents of the area?

Thank you and I await your response to my concerns.  
Sincerely, Laurie A. Roe, Enfield, New York

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**From:** abiah david <abiah2000@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 8:55 PM  
**Subject:** Pubic comment on LPG storage near Seneca Lake

I am writing because i am very concernd about Seneca lake and the land around it.I am 10 years old and I have had many fun times in the lake and it would be sad to see the water polluted.It seems that putting petroleum gas that close to the water would polluted it.Clean water is essential for survival and too much water has already been polluted all over the world.Please consider my thoughts.

Sincerely,  
Abiah David  
1385 Beardsley Hollow Road  
Alpine, NY 14805

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**From:** Ashley Miller <ashleym@fltg.net>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 9:25 PM  
**Subject:** Gas Storage at U.S. Salt near Watkins Glen

Dear Mr. Bimber,

I wish to express my concerns about the safety of the proposed holding pond for displaced brine on the steep slope (8 to 12 percent) above Seneca Lake. Plans call for a 14 acre reservoir holding nearly 92 million gallons with a 32 to 50 foot impoundment structure. Building such a pond on this steeply sloping hill is a huge risk. Leakage or collapse into the lake would be catastrophic. Exactly how does Finger Lakes LPG Storage Corporation plan to construct and maintain a foolproof structure?

How will they insure that no gas migrates during storage? What kind of a track record does storage of LPG in salt caverns have?

What about the economic implications of greatly increased truck traffic which could make things quite unpleasant for the summer tourists that Watkins Glen depends on. The west shore of Seneca Lake is lined with wineries, another tourist draw. The road connecting all them is two lanes for the most part. Clogged with trucks, it could kill tourism on the Seneca Wine Trail.

The town of Watkins Glen is located at the bottom of several long, steep hills. With an increase in truck traffic, residents of this area know that this means an increase in the inability to brake down these grades, resulting in possible deaths and injury.

I encourage the DEC to show in the dEIS for this project, that they care more about the well-being of a beautiful region and its people more than the health of a corporation.

Best regards,  
Ashley Miller

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**From:** Charlotte Dickens <cdickens@lightlink.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 9:50 PM  
**Subject:** LP gas storage near Seneca Lake

Mr. Bimber,

I would like to write in opposition to the storage of gas near Seneca Lake. I feel there would be significant negative impact to the environmental and economic well-being of Schuyler County if the proposed storage is allowed. It would appear that these storage facilities present a public danger and therefore should not be allowed near a populated community. Schuyler County depends on its tourist industry, which could also be impacted negatively by such an installation. Our lake is one of our most important resources in terms of beauty. We have also enjoyed a relatively clean environment, and we do not need projects here that change that status. These resources cannot be lightly considered just because some gas operation wants to utilize the salt caverns for their own monetary purposes. Such business interests do not concern themselves greatly with safety or environmental concerns as could readily be seen with the huge oil spill witnessed recently on the Gulf Coast. Profit is the main concern of such corporate interests while human and environmental concerns take the back seat. Please do not allow this in the beautiful countryside in our county--a resource that once destroyed will never be replaced. We do not need this in our beautiful little community that many tourists come to visit and enjoy. The impact upon this industry needs to be considered along with the possible danger and pollution, not to mention strain upon our infrastructure.

Thank you and please add my letter to your comments.

Sincerely,

Charlotte Dickens  
4612 Kellogg Road  
Burdett, NY 14818

**From:** Natalia J Demong/ Emlen <njd7@cornell.edu>  
**To:** "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>, "njd7@corne...  
**Date:** 1/31/2011 10:39 PM  
**Subject:** RE: Draft Scoping Comments - Watkins Glen LPG Storage Facility

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David Bimber  
 Deputy Regional Permit Administrator  
 New York State Department of Environmental Conservation  
 email to: dlbimber@gw.dec.state.ny.us

Subject: Draft Scoping Comments - Watkins Glen LPG Storage Facility

Dear Mr. Bimber:

I wish to thank you and your department for its Nov. 17 2010 Positive Declaration that a Draft Supplemental Environmental Impact Statement (DSEIS) is advisable and necessary in light of the potential significant adverse environmental impacts that may result from the proposed Watkins Glen LPG Storage Facility.

I have many grave doubts about the proposed facility, including the construction and maintenance of the 14 acre surface brine pond, which I will attempt to discuss in terms of The Draft Scoping Outline.

DRAFT SCOPING OUTLINE

3.0 INTRODUCTION & BACKGROUND

Impacts on land

Potential for subsidence associated with underground storage operations

I had to turn to a reference book to understand the word "subsidence" from a geology and engineering perspective. There are several types of subsidence and I wonder whether the construction of the brine pond and its resulting effects on soil disruption and soil drainage might cause additional types of subsidence beyond that associated with underground storage operations. Can you please expand this discussion to define all potential causes of subsidence, including potential size, and the worst case scenario of vertical magnitude?

3.1 ENVIRONMENTAL REVIEW PROCESS

3.1.1 Permits Required

The brine pond is of significant size and volume -- 14 acres, 91.98 million gallons capacity -- that it has been described in the current scoping document as a "brine pond and its associated impoundment structure" with a "maximum height of 50 feet above its down slope toe". To me, this implies a sizeable structure that might be more accurately described as a RESERVOIR or DAM. Surely, some permitting process should govern the design and construction of such an edifice. I find no such permits listed in Table 1.0

3.1.1 State Environmental Quality Review

4.0 ENVIRONMENTAL SETTING, SIGNIFICANT ENVIRONMENTAL IMPACTS, AND....

Given the disclosure aspect of the DSEIS and what you describe this section should do , I urge you to discuss the suitability, or complete LACK thereof, of this project to the proposed location adjacent to beautiful Seneca Lake, part of New York State's "tourist Lake district" and home to some of our State's distinguished wineries.

The industrialization of our rural landscape, adjacent to the beauty of Watkins Glen State Park, is, to my way of thinking, short-sighted, questionable gain sacrificing long-term irreversible effects on the lifestyles of the people of our region.

)

4.1 IMPACTS ON LAND

4.1.1. Ecological Resources

4.1.1.1 Existing Environmental Setting

4.1.1.2 Potential Impacts

What happens when migratory and residential waterfowl species land on the brine pond???  
What happens to these birds as they swim in and dive into salt water?

Is the brine contaminated with radioactivity, eg -- is there radon / radioactivity in the brine solution? Has anyone tested for this? Addressed the implications from radioactive brine in an exposed "brine pond?"

4.1.2 Proposed Brine Pond

4.1.2.2 Potential Impacts

In 1973, and again in 1976, in Ithaca, NY & its environs, we experienced two different "100 year rain storms events". I personally had 3 drastically bad experiences involving automobiles and rising stream waters. In one case my automobile was stranded for 5 weeks until our driveway could be replaced. The second time, our two cars were picked up and washed downstream. The Ithaca Journal documented cases of chicken coops floating down the Main Street of Slaterville Springs, NY. What happens to the brine impoundment in the summer, if it is full and if we have rainfall of unexpected intensity such as we had in the mid-1970's? What will it take for this pond to overflow due to catastrophic natural events and what will the consequences be?

This brine impoundment would seem to be a disasterous idea from many perspectives, many of which you outline in your draft scoping document. Storage of brine in sealed, corrosive-proof tanks would seem more pragmatic. It does not seem to me that DEC should concern itself with containing the costs of this project to benefit the FingerLakes LPG Storage LLC as opposed to protecting the environment and local citizens' vested interest in protecting their natural environment.

4.2 IMPACTS ON WATER RESOURCES

4.2.1 Groundwater

4.2.1.2 Potential Impacts

RE: "a spill pollution prevention plan will be prepared..." I beleive we should have ZERO TOLERANCE for any plan that risks spilling brine into Seneca Lake and/or polluting surrounding groundwater.

4.2.2 Surface Water

4.2.2.1 Existing Environmental Setting... I am confused why Seneca Lake itself is not specifically mentioned in this section along with "streams, wetlands, floodplains (if any)..."

I again question why the continued use of the words "proposed brine pond". I think their use is disingenuous and seeks to conceal the size and complexity of the impoundment/ dam. I urge the DEC to use the wording it deems appropriate to describe the situation and not necessarily the words that FingerLakes LPG Storage LLC has chosen to describe its project.

4.5 IMPACTS ON AESTHETIC RESOURCES

4.5.1 Environmental Setting

The industrialization of our rural landscape, so close to the beauty of Watkins Glen State Park, and the views of vineyards along the Seneca Lake shoreline is, to my way of thinking, both visually and in terms of noise pollution, a complete mis-match to the values and existing livlihoods of the residents of Reading, Watkins Glen and all the surrounding towns. The building of the proposed facility would seem to be inappropriate use of Seneca Lake shoreline, given the other agricultural and tourist activities of the area.

4.6.2 Potential Impacts

What is the projected useful life of the brine pond? its liner?

5.5 ALTERNATIVES TO THE PROPOSED ACTION

Alternative Sites.

It is not clear to me from the way this paragraph is written that the DEC feels it has the power to stop this project, if it deems that is the wisest course of action. Am I missing something here?

Why should not the company come back with a different plan, should it chose to evaluate other sites that it either owns or has options on? Why does this work initially fall to the taxpayer-funded DEC?

There is so much more I could write about, including the dangers to local emergency personnel about the hazards of LPG storage and transportation, but I think I will give both you and myself a time-out, a rest.

I wish you success in preparing your next document... I believe your task is not an easy one.

Sincerely,

Natalie J. Emlen  
property owner

**From:** Ellen Fitzhugh <fingerlakesone@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 11:49 PM  
**Subject:** LPG storage

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Dear Mr. Bimber,

I'm a citizen of the Finger Lakes and very concerned about the issue of storage and transportation of LPG and its potential effects on our beautiful area. Please exercise great care in examining the data concerning this venture.

Regards,

Ellen Fitzhugh

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**From:** Nancy YoungGeorge <waterglass8@gmail.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 1/31/2011 11:57 PM  
**Subject:** finger lakes LPG storage,LLC- proposed new underground LPG storage Facility SEQR  
status:type 1

Dear Mr. Bimber,  
I have the following comments on The Draft Scope for the Finger Lakes LPG Storage, LLC - New Underground LPG Storage Facility project (DEC Facility ID 8-4432-00085):

The proximity of the proposed storage to Seneca Lake is of great concern. Lakes and other water sources are not a closed system. There is alot of interchange between the ground above, below and near large bodies of water, for example, run of may occur from hillsides. Part of the plan includes storage of "brine". What controls and safeguards would be mandated to keep this "brine" away from the lake, especially in the likely event of ground shifting as a result of shock waves generated from the creation of new salt mining,earthquakes, seasonal episodes, snow slides, mud/water movement etc.

It is not completely clear what this" brine" may consist of. Although, the term brine may apply to salt water, it also has some connection to fluids from drilling of natural gas. Since many acres of land in and around Watkins glen have recently been sold to gas companies, what assurances are in place to prevent this system from being used to store possible fracking materials.

Geologically, the area is riddled with salt mines. I believe these mines are unstable as they most probably intersect the inherent faults and cracks in the local bedrock which consists of shales, limestones, and other sedimentary rock. Increased activity resulting from transferring brine and gas could cause collapse and possible opening of faults.

The area in question is a small rural part of New York State. It is not equiped to handle heavy truck traffic, particularly truck coming down the steep road into Watkins Glen. What would happen in the probable event of an out of control truck? What would be the impact on the tiny town of Reading?

These are only some of my great concerns with respect to environmental and local effects if this project of brine and LPG storage were to occur.

Thank you for your attention.

Sincerely,  
Nancy Young, Resident only 20 minutes away from this impacted area

Dear Mr. Bimber,

1/27/11

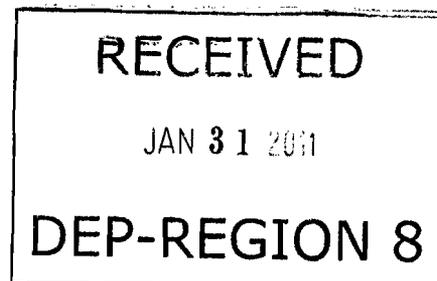
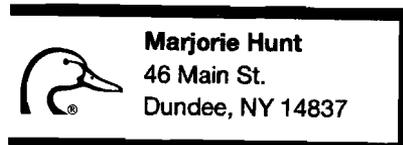
I read about the proposed storage of LPG in 2 different papers and was only provided with an E-Mail address to respond. I am one of 2 or 3 people in NYS who do not have E-Mail and it took some research to find a mailing address. This option should always be provided in any offer to respond to an idea.

I wish to cast my vote for a huge NO with regard to storing any thing like the planned LPG and brine storage near any large body of water--- especially one that provides drinking water to communities along its shores. I feel there is a real danger that the brine ponds could leak and ruin the surrounding beauty of the hill side as well as cause destruction to forests and crops. I also see danger in storing such a huge amount of gas in a populated area where the main commerce is tourism. The heavy use of the local roads could lead to expensive repairs at taxpayer expense and the local roads are not built to accommodate large, heavy, slow moving trucks and the large amount of tourist traffic that occurs in our area when the wineries are in season and the Watkins Glen race track is holding events.

I am sure that people on the pro side of this issue will rebut all my concerns but I grew up in this area and would very much like to leave the area with the same beauty and recreational uses I have enjoyed all these years.

Thank you for your attention to this matter,

Marjorie J. Hunt



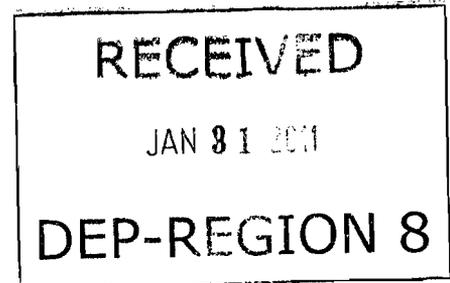


224 Cross Road  
Geneva, New York 14456  
(315) 789-3285  
Fax (315) 789-7107

3619 Routes 5 and 20  
Canandaigua, New York 14424  
(585) 394-5090  
Fax (585) 394-6083

2381 Rt. 14A  
Penn Yan, New York 14527  
(315) 536-1085  
Fax (315) 536-7911

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January 26, 2011

Mr. David Bimber, Deputy Regional Permit Administrator  
New York State DEC  
6274 East Avon-Lima Road  
Avon, NY 14414

Re: Finger Lakes LPG Storage

Dear Mr. Bimber;

I am writing to support the proposed Finger Lakes LPG Storage facility in the town of Reading for the storage of butane and propane.

The use of propane, an environmentally clean fuel with exemptions from LUST regulations, has been growing in the northeast US and in particular New York State. This growth has caused significant distribution problems in three of the last four years as the infrastructure has not been able to keep pace with the demand and needs of this industry. The resulting constraints has added a significant financial burden to the propane marketers in New York and ultimately to the propane consumers. This project would address many of the problems the New York marketers and consumers face, while supporting the economic stability of this region.

As an environmentally friendly fuel, propane and butane, if accidentally released would not pollute the adjacent land and lake. The use of salt caverns for the storage of these products has an impeccable safety record going back for over 5 decades. I am aware of 3 other sites within New York where these products are currently being stored. Most of the product will be transported in and out of the Watkins Glen area by rail and pipeline, causing minimal damage to the environment. If the project had been completed as originally scheduled, I doubt that over 150 transport trucks would be needed to transverse New York roads daily from Ohio and Michigan, in an attempt to keep northeastern consumers supplied with propane. I also doubt that my transports would be traveling more than twice as many miles as normal, waiting in lines for as many as 15 additional hours per trip to deliver product to my 4 plants in the Finger Lakes region.

|

In conclusion, I would encourage the expeditious approval of this project by an established and responsible business in New York, providing needed jobs, infrastructure improvements and financial relief to New York energy consumers.

Very truly yours,



Roland Penta  
President

Cc: Mike Nozzolio, Brian Kolb

RECEIVED  
JAN 31 2011  
DEP-REGION 8

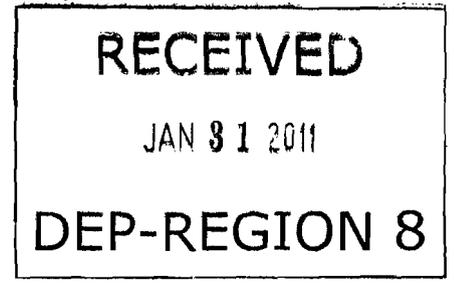
W.M. Newell 85  
4810 B.S. 117  
ROCK SPRING NY 14578

NYS DEPT OF ENVIRONMENTAL CONSERVATION

6274 EAST AVENUE LINDEN RD

AUGUS NY 14474-8519

ATTN: MR DAVID L. BIBBER



SUBJECT: DEC FILING NO. 8-4432-01-055

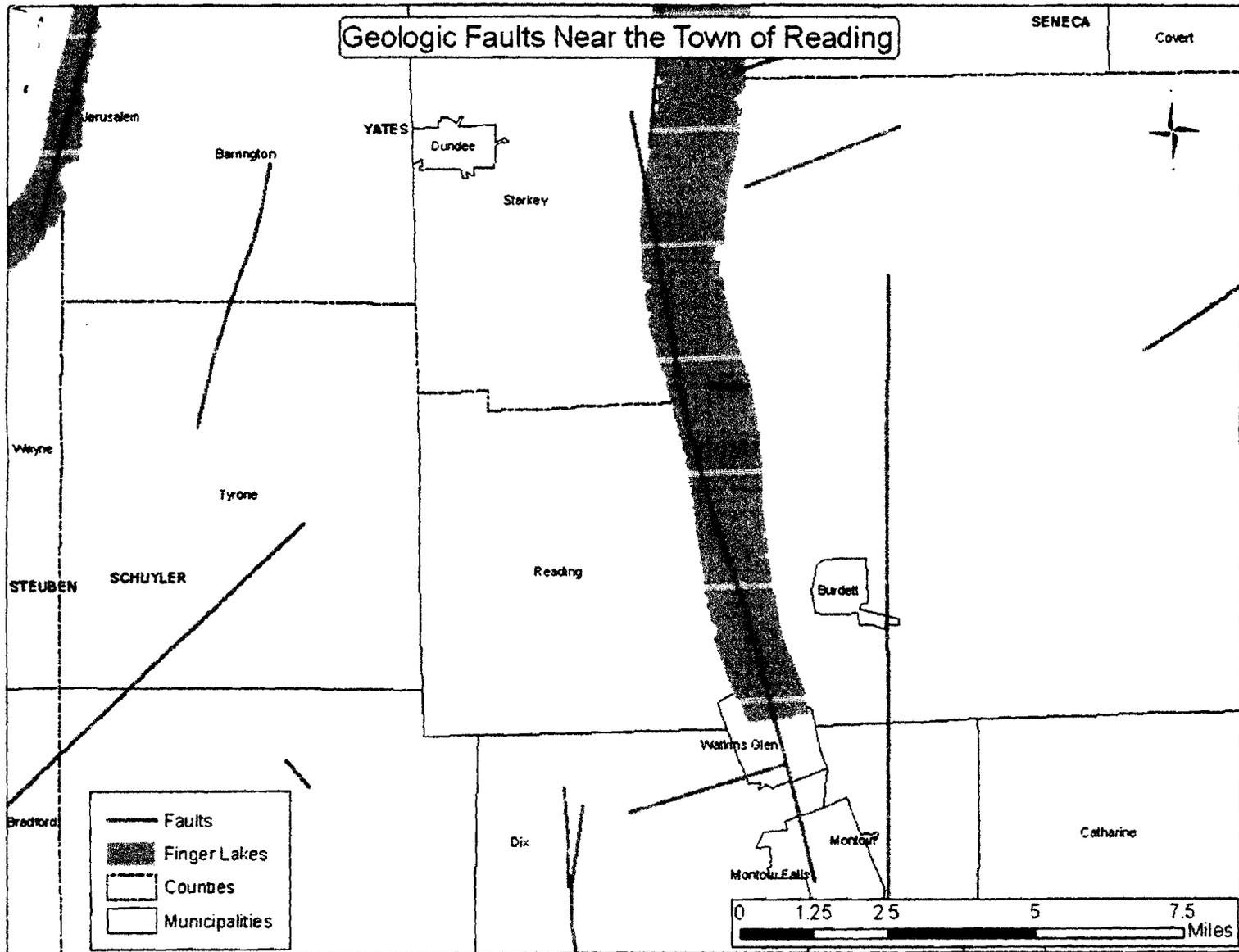
DEAR MR BIBBER:

FOLLOWING OUR PREVIOUS DISCUSSION, I BELIEVE

THE FOLLOWING ITEMS SHOULD BE PART OF THE STUDY:

1. POSSIBLE EROSION ON THE SLOPE ABOVE AND BELOW THE BRUSH PILE DUE TO THE REMOVAL OF MANY TREES OR TREES
2. CONSIDERATION OF THE GEOTECHNICAL FAILURE UNDER THE LOADS  
SEE ATTACHMENT 2. WILL BE DONE BY THE SAME CONSULTANT LOCATED
3. IN THE EVENT OF A BRUSH PILE COLLAPSE HOW LONG WOULD IT BE BEFORE WATERS BEGINS AND HOW LONG WOULD IT TAKE TO DRAIN DRAINAGE WATER FROM THE LOT?
4. WHAT WOULD BE THE TYPICAL TRANSMISSION EFFICIENCY OF WATERS BEING DRAINAGE AND GROUND WATER 1408.44- RISK TO THE GROUND WATER CONTAMINATION?
5. VISUAL IMPACT FROM VIEWING THE LOT IN AREA - APPROXIMATELY 15 FEET TO THE SOUTH OF THE BRUSH PILE?

W.M. Newell



RECEIVED  
 JAN 31 2011  
 DEP-REGION 8

2

86

**From:** "Richard Brescia" <brescia@nyall.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** "Jay Jackson" <JJackson@inergyservices.com>, "Amber La Fountain" <helm...>  
**Date:** 2/1/2011 12:40 PM  
**Subject:** Finger Lake Gas Storage -SEQRA  
**Attachments:** Finger lakes seqra review 2011.docx

Mr. Bimber - Thank you for accepting these comments of the NY Propane Association for the docket.

R. Brescia

1

Richard Brescia  
NYALL. LLC  
321 Loudon Road  
Loudonville, NY 12211  
(518) 436 6733 – [Brescia@nyall.com](mailto:Brescia@nyall.com)

January 31, 2011

Via e-mail attachment

David Bimber  
Region 8  
NYS Department of Environmental Conservation  
Avon, NY  
Re: Finger Lakes Gas Storage– SEQRA Review

Dear Mr. Bimber,

I am writing on behalf of the New York Propane Gas Association (NYPGA) in Support of Inergy's application to build and operate its Finger Lakes Gas Storage facility now under SEQRA review.

The ability of the propane industry to supply product depends on storage capacity within economically efficient distance from mostly rural, residential customers. The market covers extensive areas of upstate and both Nassau and Suffolk counties.

In almost each of the last twenty years the NYPGA and its counterparts throughout the country have sought and been granted waivers from the hazardous materials drivers' hourly limitation rule administered jointly by USDOT and state dot's. The current waiver, the longest ever, (through February 19<sup>th</sup>) was necessitated, in part, by loss of the TEPPCO (Enterprise) pipeline, now under repairs that have been completed to Oneonta, one loading rack west of Selkirk, the largest on the system in NY State. The industry had been retrieving product from Watkins Glen and points in Pennsylvania and Ohio, distances that add materially to costs consumers must pay.

While the loss of the pipeline is not the only reason for waivers, there is no doubt that additional primary and secondary storage would have ameliorated these costs and tight supply, that even without the shut-in of the line reflect the absence of sufficient storage, a result of the lengthy permitting processes by the state and localities. The fact of the matter is Inergy's investment in the Finger Lakes Gas Storage facility reflects an accurate evaluation of deficiencies in the propane market inducing them to commit significant resources to the northeast region.

While we are cognizant of the importance of environmental review for storage projects of this kind, approval of the Finger Lakes Gas Storage project, both its below and above ground portions, including the loading rack and rail facilities, is vital to the sustainability and growth of the propane industry which this year has absorbed or passed on to consumers an additional 22 cents per gallon that could have been avoided had the Finger Lakes review been expeditious. Last year the industry requested the above and below ground permits be evaluated separately to make the loading racks and rail facility available for the 2010-11 heating season. This was denied.

Since 1963, the enabling act sought two goals: unitization rules to protect co-relative rights of land owners; and development of natural and LPG gas storage caverns in proximity to northeast markets.

While I am not sure of the extent of Part 550, its provisions should be sufficiently extensive and clear to process drilling and storage permits without resort to the costly delays of positive declarations to explore impacts that should have been anticipated in the rule. A review of regulatory protocols in other states might provide some guidance on how to structure regulations that protect the environment while promoting development of the energy industry, especially propane, a clean, low impact, largely domestically produced fuel.

On behalf of the approximately 120 members of the NYPGA we request you add these comment to the docket and make a favorable ruling on the Finger Lakes Gas Storage project.

Cordially,

Richard Brescia



# Combined Energy Services

216 E. Broadway  
Monticello, NY 12701  
845-794-6226

1483 Rte. 739  
Dingmans Ferry, PA 18328  
570-828-1700

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February 1, 2011

David Bimber  
NYSDEC Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414

Re: Finger Lakes Gas Storage– SEQRA Review

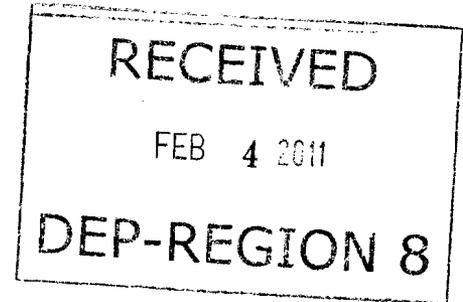
Dear Mr. Bimber:

I am writing in SUPPORT of Inergy's application to build and operate it's Finger Lakes Gas Storage facility now under SEQRA review.

The supply network to provide propane gas to the northeast has not kept up with the growing demand of the consumers and the dealers that deliver to them. Each winter, we as propane gas dealers, find it harder to locate and receive product to keep up with winter's demand. The 8 inch Teppco pipeline that supplies much of the gas for New York is grossly undersized and simply can't deliver what we need at peak draw times from December to March. This is forcing dealers to pay very high rates for trucking to travel to terminals in far reaching areas such as Pennsylvania, Ohio, Maryland, Indiana, Illinois, etc... These added costs must get passed along to the consumers in our state in economic times that already have many living well below poverty range in my area. The added travel by our tractor trailers surely add more trucks to the roads in NYS, going further distances with drivers that are stretched to the limits in terms of fatigue.

Our hopes are that this salt cavern would be able to serve not only the Finger Lakes region of Watkins Glen, but dealers throughout New York State. We're being told that the vast majority of the gas will be brought in via the Teppco pipeline and in winter we're going to be able to pull the gas out of the cavern and then ship it eastward to Oneonta and Selkirk, NY which are closer for dozens and dozens of gas dealers. None of our trucks will even utilize the roads in the Watkins area is the hope if this cavern can be utilized by Inergy.

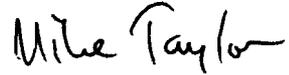
The Finger Lakes gas storage cavern will be by far the most important supply infrastructure asset for the propane industry and our customers since the installation of the now stretched Teppco Pipeline 50 years ago.



Thank you for your consideration.

Respectfully,

COMBINED ENERGY SERVICES

A handwritten signature in black ink that reads "Mike Taylor". The signature is written in a cursive, slightly slanted style.

Michael Taylor, owner

cc: Aileen Gunther, NYS Assembly 98<sup>th</sup> District  
Member, Committee on Environmental Conservation

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**From:** "Samuel J. Maggio" <sam@icm.cc>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**CC:** "Laura & Wayne Lynch" <llynch@stny.rr.com>, "Judi Gibbs" <jgibbs2@st...  
**Date:** 2/1/2011 2:02 PM  
**Subject:** RE: PUBLIC COMMENT on FINGER LAKES LPG STORAGE (INERGY) LPG in salt caverns near Seneca Lake

TO: David Bimber, Deputy Regional Permit Administrator, New York State Department of Conservation

RE: PUBLIC COMMENT on Finger Lakes LPG Storage (INERGY) Request for approval to store LPG in salt caverns near Watkins Glenn on shore of Seneca Lake with 14 Acre Man Made Brine Lake

Mr Bimber----

As a resident, land owner, farmer, and tax payer in Schuyler County I feel I have some standing in writing to you today regarding the proposed LPG Gas Storage Facility being proposed for placement on the steep Western slope right above Seneca Lake.

One of first grave concerns has to do with the fact that the proposal calls for a massive MAN-MADE 14 ACRE BRINE POND literally on the slopes above Seneca Lake. Pardon the expression but ---- "Are you guys nuts?!" To even consider such a brine pond in such a precarious location with such obvious potentially catastrophic disasters for Seneca Lake is beyond belief! No one in their right mind would ever seriously consider placing a 14 ACRE BRINE POND on a very steep slope directly over one of the most vital bodies of fresh water in the State of New York! No one!!

Another grave concern is heavy VOC's from diesel trucks and diesel generators. Recent studies have proven that crops especially GRAPES are highly susceptible to these VOC's. Seneca Lake is in the very heart of Wine Country in New York State. Thus the proposed LPG facility being proposed for placement in the heart of Wine Country will increase dramatically the VOC's from diesel engines and will have a detrimental affect about the existing Wine Industry.

If those two concerns are NOT enough a third grave concern is the INDUSTRIALIZATION of the Finger Lakes region by this proposed massive LPG

1

facility and the industrialization in general by an energy source (gas) that---at its very best---is viewed as a mere bridge fuel. The clear implication of a bridge fuel is it is only short term and is not intended to have long term usage. However, industrializing the Finger Lakes will have LONG TERM impacts and none of them are positive for the environment, the crops, the people, or the local economy. The fact is -- this proposed industrial facility will impoverish the environmental sanctity and health of this region and the impacts can long term, most likely permanent.

Lastly, the local economy thrives on tourism, wineries, and farming and this proposed LPG storage facility endangers all of these. Diesel engines, facility lights, the massive man made pond itself, the piping --- are all incompatible and incongruous with what is working now for the local economy and the people of the Finger Lakes. This facility with the potential for explosion and or leaks poses far too great a risk for the community and for our environment. And, especially for our LIVES.

Quite frankly, I could continue with additional reasons why this proposed LPG storage facility on the steep slopes above Seneca Lake in the heart of Wine Country is a very bad idea. However, I feel the concerns I have sighted are sufficient for any conscious, sensible, intelligent human being to conclude that the proposed facility is utterly preposterous and an idea that must never, ever see the light of day.

I trust you share this conclusion.

Quite honestly, the proposal for this menacing, impractical facility with massive BRINE POND is so ludicrous and so potentially dangerous it is astonishing that the consideration for actually building such a time bomb has made it this far. Moreover, I am appalled and revolted that my tax dollars and my neighbors tax dollars have been wasted on considering building this potentially destructive facility along our treasured lake.

Sincerely,

Sam Maggio

Millport, New York

Schuyler County

89

**From:** "Hilary Lambert" <hilary\_lambert@yahoo.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 2/2/2011 11:26 AM  
**Subject:** Comments, Draft Scoping Outline, DEC 8-4432-00085/00001; Finger Lakes, LLC LPG Underground Storage Facility, Watkins Glen LPG Storage Facility  
**Attachments:** CLWN Steward comments on Seneca Lake LPG Draft scoping doc 2 2 11.pdf

Dear David L. Bimber:

Please see my attached comments about the Draft Scoping Outline for the Draft Supplemental Environmental Impact Statement for the Finger Lakes, LLC LPG Underground Storage Facility, Watkins Glen LPG Storage Facility DEC 8-4432-00085/00001.

Thank you very much for this opportunity.

Sincerely yours,

HL

Hilary Lambert

Dr. Hilary Lambert

Steward, Cayuga Lake Watershed Network

POB 348

Aurora NY 13026

steward@cayugalake.org

<http://www.cayugalake.org>



**Cayuga Lake Watershed Network**  
**POB 348**  
**Aurora NY 13026**

February 2, 2011

David L. Bimber  
NYS Department of Environmental Conservation  
Division of Environmental Permits  
4<sup>th</sup> Floor 625 Broadway  
Albany NY 12233

Dear David L. Bimber:

As Steward of the Cayuga Lake Watershed Network, I am submitting comments regarding the Draft Scoping Outline, for the Draft Supplemental Environmental Impact Statement for the Finger Lakes, LLC LPG Underground Storage Facility, Watkins Glen LPG Storage Facility DEC 8-4432-00085/00001.

The Cayuga Lake Watershed Network, Inc. (Network) is an 11-year-old nonprofit corporation representing over 450 members, administered by an active Board of Directors, with myself as Steward. The Network's mission: "The Cayuga Lake Watershed Network identifies key threats to Cayuga Lake and its watershed, and it advocates for solutions that support a healthy environment and vibrant communities." The Network is also a member of the Finger Lakes Regional Watershed Alliance, organized in 2010 to provide the Finger Lakes region with a voice for protection and conservation of our lakes and watersheds.

I am qualified to comment on the Draft Scoping Outline based on years of experience with quarry, landfill, surface mining and karst permitting in Kentucky (1992-2009). Also, Seneca Lake drains to Cayuga Lake at their northern end via the Seneca-Cayuga Canal. Thus, impacts to and degradation of Seneca Lake water quality will eventually negatively impact Cayuga Lake. Further, Cayuga Lake also is underlain by a warren of extensive salt caverns similar to those beneath Seneca Lake, and could become a target for just such as ill-advised proposal as this present proposed project for Seneca Lake. My comments should be given full weight with those submitted from within the Seneca Lake watershed.

Firstly, I fully support any and all comments submitted by our sister organization, the Seneca Lake Pure Waters Association (a fellow member of the Finger Lakes Regional Watershed Alliance). In a recent letter to DEC, SLPWA urges that a comprehensive geological study of the Seneca Lake basin be part of, or be carried out in advance of, a DSEIS for this project. Indeed, elevated levels of chloride in Seneca Lake indicate that

there may already be a problem of salt intrusion and leakage into lake waters from salt mining below.

That worrisome indicator can only be worsened, perhaps catastrophically, with the proposed construction of a dangerously-sited brine pond, pipelines, trucking facilities, new roads and rail spurs, with active LPG storage in underground salt caverns, and semi-annual transfer of many thousand of gallons of LPG and brine from surface to subsurface and back again. Thus, echoing the SLPWA, I urge that the DSEIS Scoping Outline include a geological assessment and additional testing based on an intrusion of salt into Seneca Lake from these salt mines.

I do not, however, call for assurances that this proposed facility can be safely used for the long term storage of LPG. That is impossible. An intensive industrial operation on this environmentally vulnerable, fragile site in a historic, agricultural and recreational area with all users reliant on high-quality water is reckless, dangerous and cynical.

Focusing on the proposed 14-acre brine storage pond that would be excavated in steep shale and poised above Seneca Lake's western shore just north of Watkins Glen: This proposed "pond" is identical to the coal-slurry impoundments located at the headwaters of over 200 Appalachian creeks and rivers, above densely populated and ecologically valuable valleys and watersheds. These impoundments are used to store the filthy waste generated when coal is washed prior to shipment and sale.

The collapse of such a "pond" in Martin County KY in 2000 was termed "the worst ecological disaster in the Southeast" (perhaps losing that title when a coal ash pond in TN collapsed in 2008), destroying the farming capacity, ground and surface water uses, and property values of hundreds of homes and communities in two watersheds downstream, along with all natural life and ecosystem value in the two affected creeks.

All of Seneca Lake and downstream, Cayuga Lake, would be held hostage to the fear of collapse of this brine pond. As far as I can determine from the limited documents available, this proposed pond is designed so that Seneca Lake would function as its ultimate stormwater overflow facility!

This is the height of engineering arrogance. I see in the draft scoping outline that DEC proposes to carry out careful stormwater review and to develop a very strong stormwater control program for this "pond", and that's good as far as it goes. However, if this "pond" blows a hole, the lake's water will be suddenly and permanently degraded, with devastating impacts for all lake uses and users.

Also, DEC knows even better than I do that a proposed double liner is a joke, especially at this site. Liners eventually fail; and below this liner would be fracture-ridden shale (and below that, groundwater). The shale's already-dubious integrity would be further weakened by the blasting and excavation necessary for construction of this "pond."

I have been using the word "pond" in parentheses because this is actually an impoundment and needs to be treated as such by regulators at state and federal levels, by all agencies. It would be an impoundment behind a dam, and a dam permit should be required. I learned in a recent public meeting that pressure has been

applied to prevent the need for a dam permit. Please reinstate that requirement and include its necessity in the Scoping Outline and DSEIS process.

I am very grateful to DEC for taking a proactive stance on carrying out a full DSEIS for this proposed facility. I fully support all the concerns expressed in DEC's November 17, 2010 Positive Declaration.

Once the SEIS process is under way I will urge that this proposed facility be rejected out of hand. It is the wrong facility for this sensitive rural location. At the public meeting I recently attended, I sat with numerous Watkins Glen area residents who had just learned about the project a week earlier and were devastated by its inarguable impacts upon their homes, lives, communities, economy, and natural setting.

Also, I call on your office and others at the state and federal levels to study the synergistic impacts of this proposed facility on other land uses, human communities and natural ecosystems, and to include impacts to sensitive, threatened and endangered species (at both state and federal levels).

Taking into account the proposed area for this facility, both above and below-ground, your SEIS process also needs to include a full consideration of impacts to historic buildings, landscapes, and communities, examining and weighing all associated potential impacts, both primary and secondary (as per Section 106, National Historic Preservation Act of 1966).

I understand that this SEIS process is presently regarded as essentially in-state and not led by federal agencies. I see the need for the scope of this EIS to be widened to include fuller input and oversight by federal agencies. Presently (as indicated in Table 10), US EPA has only a very limited role, regarding permitting of injection wells (a federal program that itself is overripe for comprehensive review and overhaul). I strongly urge that you add a widened role for US EPA to your scoping outline and SEIS process.

Thank you very much for this opportunity to comment on this Draft Scoping Outline. Please include me in any further correspondence and public input on this very important matter.

Sincerely yours,

*Hilary Lambert*

Dr. Hilary Lambert  
Steward, Cayuga Lake Watershed Network

90

**From:** "Michael Swasta" <mswasta@stny.rr.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 2/3/2011 4:53 PM  
**Subject:** DEC 8-4432-00085 - Comments - Draft Scoping Finger Lakes LPG Underground Storage  
**Attachments:** 2011-2-3 DEC Ltr Bimber LPG GasStor.pdf

Comments - Draft Scoping Outline dSEIS

Finger Lakes LPG Storage LLC

Watkins Glen LPG Storage Facility

DEC 8-4432-00085

Dear Mr. Bimber,

Please accept and enter the attached letter into the record for the DEC project cited above. The proposed facility introduces an industrial use to an area now predominately rural and agricultural in character, residential in use and which has significant scenic and cultural value.

Thank you,

Mike Swasta

Michael Swasta

411 Watkins Road

Horseheads, NY 14845

Telephone/Fax: 607-739-2948

Email: <mailto:mswasta@stny.rr.com> mswasta@stny.rr.com

**MICHAEL K. SWASTA**

---

February 3, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator,  
NYSDEC Region 8 Office  
6274 East Avon-Lima Road  
Avon, NY 14414

Re: Comments - Draft Scoping Outline dSEIS  
Finger Lakes LPG Storage LLC  
Watkins Glen LPG Storage Facility  
DEC 8-4432-00085

Dear Mr. Bimber,

Please accept and enter this letter into the record for the DEC project cited above. I have reviewed the scoping outline and offer the following comments for consideration. The proposed facility introduces an industrial use to an area now predominately rural and agricultural in character, residential in use and which has significant scenic and cultural value.

Impacts on air quality must be included, for example including but not limited to:

- Truck exhaust;
- Diesel locomotive exhaust;
- Evaporation of brine impoundment;
- Compressor and other facility equipment exhaust;
- LPG release to the atmosphere resulting from transfer of brine to and from salt cavern storage; and
- Release of methane gas, hydrogen sulfide gas and other naturally occurring contaminants to the air and water.

Various impacts are listed under section "3.0 Introduction and Background" but air quality seems to be omitted although it is a key component of many of the impacts that are listed.

Reference 4.2.2 Surface Water, and 4.2.2.2.1, second paragraph: "With regard to the proposed brine pond, information should be provided . . ." Please delete "should be" and add "shall be". Any information necessary to evaluate the proposed project shall be/must be/will be provided by the applicant.

The existing railroad spur on the west side of Seneca Lake runs parallel to and in very close proximity to the lake shoreline. A railroad LPG loading facility and railroad siding(s) located in close

proximity to the lake will have adverse visual, scenic impacts and environmental impacts on the lake. Proposed LPG loading facilities and railroad siding(s) must be located away from the lake with mitigation measures to negate or minimize adverse impacts.

In as much as the existing site grades range from 8 to 12 percent, location and placement on the site of the brine pond(s), truck loading facilities and rail loading facilities and rail sidings will be of utmost importance. Mitigation of negative impacts must be investigated and provided; as a minimum, consideration may include providing visual and noise-detering buffers such as fencing, screening materials and landscaping consisting of trees, shrubs and other plant materials.

Increased truck traffic on Rte 14 passing through the Village of Watkins Glen must be thoroughly studied and appropriate mitigation measures implemented. Truck traffic on Rtes 14/14A at the access to the proposed facility may require:

- New traffic signals to access the proposed facility where none presently exists;
- Alternatively, construction of a new on and off ramps and bridge over Rte 14 to access the facility;
- Mitigation of truck noise; and
- Mitigation of visual impacts of the truck loading facility.

Existing properties and uses in the vicinity of the proposed facility must be allowed to continue with minimum disruption from negative impacts. Negative visual impacts of the view shed from St Mary's cemetery, residences, agriculture/grape growing, and motels/tourist facilities looking east and southeast towards the lake must be avoided or suitably mitigated. When viewed from the west from Seneca Lake, Rte 414 and the hillsides with homes, wineries and agriculture/grape growing, the industrial character and appearance of the facility must reflect and maintain the rural/semi-rural character of the area.

There is a documented history, ranging from the 1970's to the present, of more than a dozen catastrophic failures of caverns of this type being used for LPG storage. These failures may reflect a small percentage in relation to the number of successful projects for this type of storage, but when accidents do happen, they are often catastrophic. Spills and explosions have occurred in similar projects. A thorough assessment must be done to determine whether these caverns are geologically suitable for storing hazardous materials. The geology of this region contains many faults, fissures and fractures with deep water bearing zones between rock strata. Can gas be prevented from migrating? What will happen if it does migrate? Potential environmental risks are

Letter February 2, 2011  
Mr. David L. Bimber  
Comments to DEC 8-4432-00085 Scoping  
Page 3 of 3

great. The Retsof Mine Collapse in March 1994 is a notable example of a catastrophic failure of a salt cavern in the Finger Lakes/Central NYS region. The possible implications of such a failure in proximity to Watkins Glen and Seneca Lake are unimaginable. Some include the following:

- Negative impacts to public safety
- Damage to residential, agricultural and business structures
- Damage to agricultural lands, public utilities and infrastructures, and cultural resources
- Damage to Seneca Lake and recreational resources
- Aquifer pollution
- Loss or diminution of potable water supplies and drinking water wells from lowering of the aquifer
- Methane and hydrogen sulfide gas, and groundwater infiltration of water supply
- Diminished air quality from the release of methane and hydrogen sulfide gases to the atmosphere
- Migration of highly mineralized groundwater into fresh water supplies
- Geological instability – surface subsidence, fissures and sinkholes

Possible brine pond mitigation measures for consideration may include:

- Fail-safe containment and monitoring systems;
- Multiple terraced locations for smaller brine ponds in lieu of a single 14 acre pond;
- Covered and possibly enclosed brine pond(s); and
- Provide visual and noise-deterring buffers to include fencing, screening materials and landscaping consisting of trees, shrubs and other plant materials.

Thank you for your consideration.

Respectfully submitted,

(signed)

Michael K. Swasta  
411 Watkins Road  
Horseheads, NY 14845  
Telephone/Fax: 607-739-2948  
Email: [mswasta@stny.rr.com](mailto:mswasta@stny.rr.com)

91

**From:** <VACAROUSEL@aol.com>  
**To:** <dlbimber@gw.dec.state.ny.us>  
**Date:** 2/3/2011 7:21 PM  
**Subject:** Re: Brine ponds and Gas storage on 414 in Watkins

We live on Rt. 329 in Watkins. The railroad overpass on this road is in such a poor state of repair that it would be pure folly to increase the traffic on it, especially with something as volatile as gas. The bridge is 100 years old, it is crumbling, there have been numerous crashes into the abutments and a backhoe was destroyed when it didn't fit underneath the bridge and crashed into the metal railings that are all that would keep a train from going over the side. If a train carrying gas should fall not only would those of us in the vicinity be burnt to a crisp immediately, but probably half the state park would have to be evacuated and the campgrounds near to this location would be a death trap. Not only the bridge over the gorge is a concern, but this one as well. Until these issues are resolved we cannot support this project. I would consider an explosion of gas to be a bit of an environmental concern.

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