From: Chuck Sorensen <chaz_ny2002@yahoo.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 6/6/2011 3:53 PM
Subject: Inergy Reading, NY Project - Chemical Engineer's Perspective
Attachments: CMSorensen to DLBimber.doc

Dear Mr. Bimber,

Attached please find an electronic version of a letter I sent to you this week by US Mail.

I can be contacted at this email address or the phone number in the letter if you would like to discuss my findings including some preliminary offsite consequence estimates I have done.

Sincerely,

Chuck Sorensen
June 3, 2011
2602A Spencer Hill Rd
Corning, NY 14830

David L. Bimber
NYS DEC-Region 8
6274 East Avon Lima Rd
Avon, NY 14414
(585) 225-3401

Dear Mr. Bimber,

I am writing this letter to highlight certain issues related to the proposed Inergy LPG storage facility in Reading, NY. My background is that I hold a PhD in Chemical Engineering from the University of Delaware (1985), have a professional engineering license, and 26 years experience. I spent 14 years working for Mobil Oil (now ExxonMobil) in a variety of oil refinery-related capacities including R&D, engineering, process and equipment design, operations, and safety including accidental release and offsite consequence issues for hydrocarbons and toxics stored under pressure. I hold 24 US patents including several that involve processing of LPG at high pressure.

I have read through the Inergy DSEIS document and would like to make some comments on it. After that, I have some insights and significant concerns with the safety of the project in the event of accidental releases.

As others have pointed out, the assumption of perfect mixing in the catastrophic brine release calculation into Seneca Lake on page 91 is an unacceptable simplification. In the event of a large release the local concentration of salt in the area near the brine spill would be very high. Detailed modeling of the scenario should be performed.

I did not see anything in the DSEIS that addressed the potential for odors from the facility. Concerns that I have include the potential for odors from the brine pond, from process operations including process upsets, fugitive odors from pumps, flanges, sample taps, and valves. While propane (without odorant) is considered odorless, the presence of propylene and other LPG constituents within allowable specification limits result in odor.

There was nothing in the DSEIS that indicated that Inergy plans to use LPG odorant in the facility. I think this is an omission on their part since odorant is required for rail and on-road transport and it seems it should be part of their rail and truck depot plans. Does Inergy plan to store and use ethyl mercaptan at the facility, and if so at what storage volume?

The flare is another area where I have questions. When brine is moved from the underground cavern to the storage pond, it will go through a separator to remove any dissolved or entrained LPG, and the LPG off-gas will be flared. There was not enough information in the DSEIS to assess the impact of a process flare on the surrounding area. Flares can affect the visual aesthetics, generate noise, produce smoky particulates, and gaseous emissions. The potential for brine-sourced chlorides in the flare gas raises additional questions about the types of gaseous emissions from such a facility (e.g. trace chlorinated hydrocarbons formed in-situ). It is my personal experience working in refineries that the flare is responsible for the majority of safety, health, and environmental community complaints, especially when process upsets occur and a significant amount of flare activity occurs.
I would also like more information about the potential release of hydrocarbons from the storage pond itself. Over time, and after contact with a significant quantity of hydrocarbon, there is the potential that trace contaminants in LPG would build up in the brine system. From my perspective, the brine is a “recycle loop” in Inergy’s system and the build up of undesirable components in a recycle loop is a fundamental watch-out for any chemical process. Other sources of unexpected hydrocarbons in the brine could come from microbial action. If trace components are heavier than LPG and/or have organic functional groups that affect their solubility, the flare separator may not remove them.

There was no mention in the DSEIS about auxiliary LPG process units such as dehydrators. LPG in contact with brine would be expected to pick up some water and dehydrating units have been used at other storage facilities to dry the hydrocarbon. What other processing and handling operations and associated equipment are planned?

I did not see any remarks in the DSEIS about the impact of seasonal ambient conditions. The freezing point of brine is lower than that of water, but there is potential that under severe cold winter conditions such as those experienced in Reading, NY this January, brine can freeze. While it would be unlikely that the pond would freeze over, I am more concerned with the lesser quantities contained in pipes, valves, pumps, etc. This could affect Inergy’s ability to operate and could pose a safety issue. It is worth noting that there are only three other salt caverns in the northern latitudes in the United States – Inergy’s Savona, NY LPG facility and two in Michigan according to an Energy Information Administration 2004 map. I am not able to determine if the Michigan facilities are brine compensated. A Google map image of the LPG storage facility in Alto, MI suggests that it is not brine compensated.

My other comments concern the potential for accidental release of flammable liquids and gases from the facility. The Inergy DSEIS referred to EPA RMP and OSHA PSM analyses which will be forthcoming, presumably after a project would be approved. I think the potential issues involving an accidental release are significant and should be discussed before approval is considered.

The quantity of flammable propane and butane proposed by Inergy at the 2.1 million barrel initial phase is 74 times more than the amount stored at the nearby Enterprise-TEPPCO facility in Watkins Glen. If Inergy were permitted to expand to the full 5 million barrel storage capacity, as indicated on their website, it would be over 170 times larger than TEPPCO. This significant amount of hydrocarbon storage presents potentially catastrophic offsite consequences if an accident were to occur. While I believe that underground storage is considerably safer than above-ground, the facility will be handling very large quantities of LPG under high pressure (e.g. 1000 psig at the well head), and making transfers through pipelines, trucks, and rail cars. The frequency of transfer operations, equipment failure, engineering design weakness, corrosion, poor maintenance, and most importantly human error are some of the factors that conspire to create unexpected accidents.

It is my belief that Inergy has no experience planning and building a storage facility of this size and complexity. I have not found evidence to the contrary. My understanding is that they bought the existing Savona, NY facility in 2006. I am concerned that they may be underwhelming the potential risks.

With respect to accidental release of LPG, a major concern I have with this project is the location of the well, the distribution terminal, the pumps, and pipelines on the side of a down-sloping hill above Seneca Lake. In the event of an accidental release, the heavier-than-air nature of a LPG
cloud would likely send the release down onto the lake where predominant winds could sweep it into Watkins Glen or other residential and commercial areas, creating major offsite risk. In the 1990 LPG pipeline accident and release in North Blenheim, NY, the cloud moved downhill into the town and ignited, killing two, injuring seven, and causing millions of dollars of destruction. In Georgia in September 1962 an 8” LPG pipeline leak resulted in the movement of a LPG cloud 10 miles down a river valley. The history of major releases, fires, and explosions at salt cavern storage facilities is well-documented, with the most recent events occurring in 2004.

I have been searching databases and reviewing aerial maps of other LPG storage facilities in the United States and have yet to find any that are sited on the side of a hill with residential populations below. I think it is important to point out that state of the art dense cloud models such as the DEGADIS program used by industry and the EPA are designed for flat terrain only. The Inergy project is essentially entering unknown territory as far as understanding the off-site consequences of an accidental release.

It is my opinion that the proposed Inergy project represents a substantial risk to the community if an accidental release were to occur. Moreover, a risk analysis and assessment would require analytical tools that industry and scientific community do not possess today. For these reasons I urge the State of New York to carefully analyze this project and understand the hazards, risks, and consequences of this facility as part of the review process. At minimum a Quantitative Risk Analysis/Assessment by a competent 3rd party engineering firm should be considered.

If I can supply more information or if you have questions about what I have presented here, please contact me during weekdays at (607) 974-0186.

Sincerely Yours,

Dr. Charles Sorensen
September 13, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
NYSDEC
6274 East Avon-Lima Road
Avon, New York

Dear Mr. Bimber,

I am writing to express my absolute objection to the proposed LPG Storage Facility in Watkins Glen, New York at the southern end of Seneca Lake. Seneca Lake, as part of the Finger Lakes Watershed, is a vital part of the fresh water network in the Western New York State area. It is inconceivable that any part of this irreplaceable natural resource could be put at risk.

The use of the Salt Caverns at the southern end of Seneca Lake to store such a volatile substance is an unacceptable risk both to the water quality and the safety of the residents living in the area. The guarantees offered by those who stand to benefit from this project are unreliable at the very least. There is beginning to be some evidence that the saline content of these caverns has already leached into the water table. The saline content of Seneca Lake already exceeds the levels of all the other Finger Lakes due to these salt deposits and this type of excavation and storage can only destabilize the barriers preventing further leakage into the lake.

I further wish to state my opposition to the transfer station for LPG gas to be located at the southern end of Seneca Lake. Due to its proximity to the lake and the homes of the people living in this area, it is a clear and present danger to water sources, not only above but also below ground. What can these folks be thinking?

Everywhere we witness the destruction of the air, water and land due to pollution and lack of foresight when these projects are approved without proper vetting and scientific study by impartial specialists, not by those with a direct financial interest in their approval. All the water that is on this earth is all the water there will ever be - we cannot afford to make the wrong decision.

Therefore, I respectfully request that these permits be denied until further review can assure that there will be no lasting damage to the environment and lifestyles of the residents of New York.

Thank you for your attention to this matter.

Sincerely yours,

[Signature]
10 September 2011

David Bimber, senior environmental analyst
Department of Environmental Conservation
Region 8
274 E. Avon-Lima Rd.
Avon, NY 14414-9519

Dear Mr. Bimber:

I am sending this information in snail mail form also, for your records, but thought that this might be more expedient as your timely replies are very important.

I plan on attending the DEC public hearing on the proposed Inergy liquid propane gas (and natural gas) storage project in the Town of Reading, Schuyler County.

I understand that the Inergy Corporation will be having an informational display and/or session outside of the public hearing at Watkins Glen High School for about an hour before the actual public hearing starts. Will opponents of the project be allowed the same courtesy? I am not suggesting some kind of rules like the FCC had years ago about 'equal time,' but is there any reason why opponents can't offer information, have tables set up, etc. in the same area as those of the company.

My other questions relate to the public hearing itself.

I understand that officers of the Inergy Corporation will be making a descriptive presentation about the project as part of the relatively short time allocated for the public to speak in the public hearing. Will the public be allowed to ask questions of the presenters? If not, why not? If the Inergy presentation is to lay the groundwork for the DEC public hearing, questions aimed directly to the presenters would seem to be the most expeditious way of getting information out quickly.

- In the public comment portion of the hearing, who will be the moderator?
- How will the public comments be handled? Will each person be allocated a specific amount of time. Will they be allowed to speak again or ask follow up questions.
- Will audio visual aids be available and/or allowed?

Thank you for your help with these questions and issues.

Sincerely, 

Michael J. Fitzgerald
114 N. Glen Avenue
Watkins Glen, NY 14891
607-535-4941 - home office

cc: George Lawson, publisher, The Observer Newspapers
Joseph Campbell, Gas Free Seneca
Paul D'Amato, Regional Director, Region 8 DEC
I am enthusiastic at fracking

Mr. Bimber, there are a lot of poorly informed folks in Schuyler County re: fracking. What a shame it is. My thought that many have not looked at Texas eastern transmission + the benefit to our county economy + tax base. Substantial I'm sure.

Mr. Ernest Wheeler
PO Box 240
Montour Falls, NY 14865
We wish to go on record with our **strong opposition** for Inergy’s plan to store LPG in salt caverns at the US Salt property in your township. This is a bad plan for the Town of Reading and it is a bad plan for the entire Finger Lakes region. Although it is difficult to cut through the language in the DSEIS, our opposition centers largely on the following points.

- **Economic impact is minimal on the region.** Very few jobs will actually be created by Inergy and the “pay-offs” Inergy will pay to the Town of Reading and Schuyler county are not worth the safety, environmental, and economic (tourist and winery) risks.

- **Environmental and local business risks are too great.** Only one spill or one accident would cause tremendous economic dislocation and severe consequences to the tourist and wine industry in the region as well as many local businesses in the region – not just to the Town of Reading and Watkins Glen.

Salt brine pollution into Seneca Lake would be disastrous to all. One accident could pollute Seneca lake and as we understand the proposal, the storage facility would be within 2,500 feet of Seneca Lake.

- **Increased truck and related storage traffic would be extremely disruptive, cause safety hazards, and increase noise/air pollution.** The traffic on NY route 14 and 14A is likely to become excessive, traffic in the summer in Watkins Glen is already congested, and tourists and those wanting to buy products and services in the area will simply leave and spend money elsewhere.

We split much of our local shopping between Penn Yan and Watkins Glen and we will not continue to shop in the Glen with such traffic problems and/or environmental scars in the area.
The proposed 60 foot flare stack would be a singularly ugly scar on an otherwise beautiful finger lakes setting – as likely would many of the other facilities to be built there.

Regulatory and enforcement costs. Taxes in the state of New York and likely in Schuyler County and the Town of Reading simply cannot support the significantly increased costs for enforcing existing and new regulations, permitting, licensing, etc. Who will pay for all the additional individuals that will be needed by DEC and others to insure that Inergy does, in fact, follow laws and regulations were they to proceed with this plan?

There are numerous other reasons to not approve Inergy’s plan for this gas storage facility which have been detailed elsewhere and do not need to be summarized here.

In short, the risks that the Town of Reading, Schuyler County, the Seneca Lake region, and the NY DEC might consider as a “safe,” an “accident free,” and an “environmentally friendly” gas storage facility as Inergy has outlined are simply not acceptable and the Inergy plan should be stopped... NOW.

We repeat, we are strongly opposed to this plan by Inergy and we will work with our neighbors, local/state/federal officials, and appropriate public organizations to stop the implementation of this gas storage facility.

Sincerely,

Charles R. McClure, PhD

Victoria A. McClure

cc: Robert Everett, Councilman, Town of Reading
    Gary Conklin, Councilman, Town of Reading
    Patrick Gill, Councilman, Town of Reading
    William Anderson, Councilman, Town of Reading
    Patricia J. Redick, Town Clerk, Town of Reading
    Gordon Wright, Chairman, Town of Reading Planning Board
    Joe Martens, Commissioner, NY DEC
    H. Taylor Fitch, Chairman, Yates County Legislature
    Frederick G. Wright, Supervisor, Town of Barrington
Dianne Kraus
4414 Picnic Area Rd.
Burdett, NY 14818

Dear Mr. Bimber,

I am a resident of Schuyler County and am writing to you with great concern. I have lived in the Finger Lakes region all of my adult life. I made this choice based on the incredible natural beauty of the area, and the quality of the air which contributes to a healthy lifestyle.

I have seen the damage done by fracking and by emitting toxins into the air. Given Inergys' plan for the future and the requirements to store the brine solution in a large open pond, I fear for the quality of our air and our water and our plant life in the area. Extensive research has been done about this and I believe it would only bring harm to the environment.

Add to this the amount of traffic it would bring to a small but busy tourist spot, and by my standards, this would be a horrific crime. What it comes down to is the corporate greed vs. the God given natural beauty of this region and the love we, as residents, have for it.

I greatly hope that you will take into serious consideration, the damage this project will do to this magnificent part of the country and the people who cherish and respect it.

Sincerely,

Dianne Kraus
From: "AKA Girl Friday" <akagirlfriday@aol.com>
To: <r8dep@gw.dec.state.ny.us>
Date: 9/8/2011 9:04 AM
Subject: A letter in favor of Inergy's Project
Attachments: 9-6-11 Annette Martin's Letter to NYSDEC DLB.doc; Inergy Business Partners in Schuyler by Annette Martin 9-6-11.xls

David Bimber,

The attachments provide a letter of endorsement for the Inergy Project in Watkins Glen. Also, a list of businesses created by Gas Free Seneca which include over 50% outside of Schuyler County. That list also includes a list of Schuyler County Businesses that provide services and supplies directly to US Salt/Inergy.

Thank you for your time and effort on this project. A controversial one to be sure.

Annette Martin
3464 CR 8, Burdett, NY 14818
607-215-3247
September 6, 2011

David L Bimber
NYS DEC – Region 8 Office
6274 East Avon-Lima Road
Avon, NY 14414-9516

My name is Annette Wilhelm Martin & I have lived in Schuyler County all of my 53+ years. I own two properties – one in the Town of Reading (about 2 miles from the salt plant) and one in the Town of Hector. I have worked at tourism related businesses but needed to work multiple jobs to make a living. Hence I started working for manufacturing including Cargill and US Salt/Akzo.

I remember way before Wal-Mart and Burger King – those two sure brought controversy to our rural community. Texas Eastern also brought short lived fear to the county. What if it exploded? In over 40 years I haven’t heard a boom yet. The days of the Lehigh Railroad on the east side of Seneca. Captain Palmer’s Boat Ride and the gorge were the two greatest tourist attractions back then. In other words – “I am from around here!”

I didn’t complain when the winery traffic started in the 1980’s. The whole winery concept brought tourism for two months in the summer & a few weekends the rest of the year. It certainly made the owners wealthy and provided minimum wage jobs for a few more.

However the history of US Salt goes back to the 1890’s. They have been a solid contributor in our community providing decent wages, health care and accessory employment to the trucking, supplies and contractor businesses in our region. I have created a list of businesses that do work directly with US Salt/Inergy – that are located in Schuyler County. It shows there is another side to life here – other than the tourism. We are a diverse community with manufacturing, professionals, farming and much more. The ‘NO LPG’ list has several businesses from out of county.

I am a member of the silent majority. I admit I am fearful to speak out. I tried having a conversation with a few ‘NO LPG’ members and here are a few personal observations:

1. ‘NO LPG’ members are rabid and passionate. I personally fear being bullied because of my opposing view. They don’t want to discuss or debate. Their tactics are sometimes threatening (phone calls with threats of harm), harassing (refusing to leave property when asked) and occasionally damaging (keying the car of a government appointed official).
2. ‘NO LPG’ members don’t have facts in their campaign – they don’t even use pictures and stories related to LPG storage of this type. The brine pond picture they use is a joke.
3. I am rather annoyed that people outside the county are weighing in on this process. Where local voices like mine can’t be heard without confrontation.
4. Gas Free Seneca lumps NO Fracking & ‘NO LPG’ together. Very unfair and very unfactual in that the two have little in common except for natural gas. I am for LPG storage. Fracking – I am still undecided.
5. I have lived with an Akzo brine pond, underground gas storage & pumping stations (TEPCO & NYSEG - back to Columbia Gas/Home Gas in the 1950’s), railroad revitalization (Finger Lakes RR), and increased truck traffic (Wal-Mart). I reserve no fear for this new project.
6. I personally find the tourist traffic, obscenely drunk winery patrons, pesticide runoff into the lake and the arrogance of winery/lodging owners to be offensive. Yet – they are entitled to do business in this county, too.

Hey, I live here, too! I shop locally – yet those businesses are not on THE LIST. I share meals with friends locally – those restaurants are not on THE LIST. I buy gas, have cars repaired, buy parts, purchase lumber & plumbing supplies, purchase furniture, and have both physicians and pharmacies – locally in Schuyler County. I am not a tourist!!!!!!!

The rest of us – the silent majority – live a peaceful life where prosperity is as inevitable as school taxes and winter. Please allow the Inergy Project for LPG storage to move forward.

Annette Martin, 3464 County Road 8, Burdett, New York, 14818 607-215-3247
BMS
Cargill Salt
Carquest
CL Ward Crane Service
Collins Lumber
D&T Auto
Famous Brands
HL Stephens
International Drawing
Jayne's Auto
Jeff's Septic
Jerlando's
Lakes Gas - Valero
Learn Motors
Montour Glass
Montour Muffler
Moose Club
NAPA Auto parts
Parmenter Motors
RL Perry
Schuyler Hospital
Schuyler Hospital Services
Schuyler County Highway Dept
Schuyler Towns - Reading, Dix, Hector
SCOPED
SCT Computers
Seneca Harbor Hotel
Seneca Shine
SEW Contracting
Silverline Construction
Smalley's Garage
Specchio Ford
Swarthout Recycling
Terry's Small Engine Repair
Tops
Twin Tier Eye Care
Verizon
Vickio Signs
Village of Watkins Community Center
Village of Watkins Sewer
Wal Mart
Watkins Chamber of Commerce
Watkins Lumber
Watkins Review & Express
Watkins Supply
WGFD
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From: Peggy Scott <pegsctt@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 9/25/2011 9:05 AM
Subject: silent majority

I saw your ad in the Hi-Lites, the free paper published in Schuyler County. I just wanted you to know that I am definitely one of the "silent majority". I cannot attend the upcoming meeting but am in full support of allowing economic development in our area. I am a life time resident and have a good knowledge base of mistakes and successes from the past.

It does seem to be the "classic" vocal minority that comes out in force. Although tourism and now the wineries generate much needed revenues for our area, we who live here also know that there are times when you can "roll up the streets" in the winter. As long as we are abiding by and following all guidelines set up by the DEC and other agencies, I am all for moving forward.

I've watched "outsiders" move here, stay for a few years while fighting for what they consider environmental causes, and then move out of the area. They leave the rest of us dealing with the consequences of their actions which were supposedly done on our behalf. I don't need or want people like that making these very important decisions.

I'm not sure what I can do to show support but I am willing to do my part. Thank you for taking the time to read this email.

Peggy Scott
Burdett, New York
Dear Mr. Bimber:

I write to express my strong opposition to the Inergy proposal to store gas in the Seneca salt mines. My family has owned a small house on Seneca Lake since the 1930s. Over the decades, we have witnessed this beautiful region of New York State become a destination for tourists and wine lovers from all over the world. The hospitality and wine industries now employ thousands. These jobs depend upon all of us protecting the environment of the Finger Lakes. The proposal to store gas and otherwise industrialize the shores of Seneca Lake seems to do the opposite and puts at risk not just this unique expanse of fresh water and the natural beauty of the area but the very basis of the regional economy.

Outside of Geneseo, New York, in the early 1990s, a salt mine collapsed. The impact registered on the Richter Scale and could be felt as far away as Buffalo. These kinds of accidents in abandoned salt mines are not uncommon. The fact that there is no guarantee of the stability of these caverns should be enough to halt any further consideration of the Inergy proposal. The consequences to Seneca Lake and the surrounding area of a catastrophic failure of these caverns filled with gas would be devastating and unimaginable.

Moreover, the possibility of even minor spills from the storage area, the increase of truck and rail traffic, the noise associated with the Inergy operation itself would all diminish the beauty and tranquility of the area and threatens the quality of the life and the water quality of Seneca Lake.

The Inergy proposal is a bad idea and should be rejected. The negative impact on the environment and the regional tourist and wine industry are just too great. I ask that Inergy not be granted a permit to move forward with this project.

Sincerely,

[Signature]

Todd Hobler
Phelps Road, Burdett, NY
Gregg and Patricia Goltry  
September 26, 2011  

David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516  

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)  

Dear Mr. Bimber,  

You will find that I have added my own personal comments to this letter only because I too feel strongly about the same issues. I would have said the exact same thing only I have added in my concern and comments.  

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.  

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? And the view from my home which overlooks the lake from a distance. Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people? We personally moved here to Watkins Glen for the quiet and small town. My husband’s family lived in this area since the 1930’s. I had been hearing the wonderful stories of beautiful Seneca Lake and it’s beauty. My entire family is buried here in Hector. I moved to Watkins Glen from Boston Massachusetts to get away from the traffic and noise and congestion. This was our little “heaven” our final destination. Finally some peace and quiet in our own permanent vacation home up on the hill. We live on the East side of the lake. We purchase a small ranch – our shoebox home but it has or had a beautiful view.  

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak? Hundreds and thousands of tourists come to Watkins Glen each year for NASCAR and the Vintage Race which has been an icon for this town for years. They come from all over the U.S. to come each and every year which bring more and more tourists. Watkins Glen has become the vacationers choice in the past year according to Sheman’s Travel Magazine.
Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy. The town of Watkins Glen continues to thrive because of the small businesses, florist, restaurants, quaint shops and antique stores and of course the wineries. All 100+ of them. Yes over 100 wineries! I would like to fix my small home but at what cost? So that they can destroy it? I won’t even be able to get to work. I work in Ithaca and it take me quite sometime to get through downtown Watkins Glen to get to Ithaca where I work. How will I ever get to work and how long will it take just to get through town. The traffic and fumes from truck I will inhale on the way to work or to my death.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. In fact our property taxes will go up because I will be paying for street repairs, police and firefighters and other first responder employees. We depend on first responders -- My husband is a retired police officer with 15+ year of experience in Baltimore Maryland and the first responders here in Watkins Glen are surely not prepared for the magnitude of destruction this could happen to the population here. There just is not enough personnel to make it work or to be safe or able to handle it. It is a safety issue and they refused to understand the impact and the harm. They are not the victims so they really just don’t care. Face the facts. It is not happening to me so …so what! It’s not my problem. It make 8-10 job?? For a whole 2 months….HA

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?
What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims. I do not rely on NYSEG. I depend on Watkins Glen Electric to heat my home. NYSEG is still too expensive! It would be just the gas companies – Mobile, Exxon, demand and the price goes up up up. They are only concerned with the mighty dollar.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain? Have you seen what the water in Watkins Glen consists of? We should not be digesting the water as it is now.... What happens after an accident.... Will you pay for my health bill when I get cancer...I think not! Attached is a copy of the Water contents in Watkins Glen. I would like to point out that it “quote unquote “corrodes the plumbing in our homes. So what exactly does it do to my insides when I drink it? I have to purchase spring water ... We need the trucks at Cargill and at US Salt to brings us goods but I see them every day.. day and night all in line with their trucks ideling... all the carbon monoxide as they idle. I am assuming there will be
quite an increase of truck activity to this method of madness... what health issues will this cause over a period of time.... At what cost?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley? An explosion will happen and it will be too late! I hope you reconsider and let this not be on your consciences that you could have made a better and smarter decision not to let this happen.

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table? Also I live in Watkins Glen. What happens to my drinking water or water I use on a daily basis?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?
Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions time and consideration in this utmost important matter,

A retired Baltimore Police Officer and concerned citizen, and home owner in Watkins Glen NY

Gregg and Patricia Goltry
Watkins Glen, NY 14891
I will be mailing a copy of this as well to your attention.
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<td>Industrial and Agricultural use</td>
</tr>
<tr>
<td>Village of Watkins</td>
<td>No</td>
<td>8/10</td>
<td>133 Range 17-143</td>
<td>Ug/l</td>
<td>1300</td>
<td>AL=1300</td>
<td>Discharge of drilling wastes; Discharge from metal refineries; Erosion of natural deposits.</td>
</tr>
<tr>
<td>Glen, Town of Reading &amp; Dix Copper</td>
<td>No</td>
<td>2/10</td>
<td>Avg 62.4</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td>Corrosion of household plumbing systems; Erosion of natural deposits; leaching from wood preservatives.</td>
</tr>
<tr>
<td>Village of Watkins</td>
<td>No</td>
<td>8/10</td>
<td>2.1 Range 0-2.7</td>
<td>Ug/l</td>
<td>0</td>
<td>AL=15</td>
<td></td>
</tr>
<tr>
<td>Glen, Town of Reading &amp; Dix Lead</td>
<td>No</td>
<td>2/10</td>
<td>Avg 77.4</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td>By-product of drinking water chlorination</td>
</tr>
<tr>
<td>Village of Watkins</td>
<td>No</td>
<td>5/10</td>
<td>Avg 62.4</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td></td>
</tr>
<tr>
<td>Glen TTHM [Total trihalomethanes]</td>
<td>No</td>
<td>8/10</td>
<td>11/10</td>
<td>Avg 77.4</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
</tr>
<tr>
<td>Town of Dix TTHM [Total trihalomethanes]</td>
<td>No</td>
<td>2/10</td>
<td>5/10</td>
<td>Avg 62.4</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
</tr>
<tr>
<td>Town of Reading #1 TTHM [Total trihalomethanes]</td>
<td>Yes</td>
<td>8/09</td>
<td>86</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td>By-product of drinking water chlorination</td>
</tr>
<tr>
<td>Town of Reading #2 TTHM [Total trihalomethanes]</td>
<td>No</td>
<td>8/09</td>
<td>71</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td>By-product of drinking water chlorination</td>
</tr>
<tr>
<td>Town of Reading #1 HAA [Total haloacetic acids]</td>
<td>No</td>
<td>8/09</td>
<td>25</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td>By-product of drinking water chlorination</td>
</tr>
<tr>
<td>Town of Reading #2 HAA [Total haloacetic acids]</td>
<td>No</td>
<td>8/09</td>
<td>21</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=80</td>
<td>By-product of drinking water chlorination</td>
</tr>
<tr>
<td>Nitrate</td>
<td>No</td>
<td>4/10</td>
<td>0.55 Mg/l</td>
<td>10 MCL=10</td>
<td></td>
<td></td>
<td>Runoff from fertilizer use; leaching from septic tanks, sewage; Erosion of natural deposits.</td>
</tr>
<tr>
<td>Village of Watkins Glen HAAs</td>
<td>No</td>
<td>2/10</td>
<td>Avg.</td>
<td>Ug/l</td>
<td>0</td>
<td>MCL=60</td>
<td>By-Product of drinking water chlorination.</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>----</td>
<td>------</td>
<td>------</td>
<td>------</td>
<td>---</td>
<td>--------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>[Total Haloacetic Acids]</td>
<td>No</td>
<td>5/10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>8/10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>11/10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Town of Dix HAAs</td>
<td>No</td>
<td>3/09</td>
<td>Ave.</td>
<td>17.9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Total Haloacetic Acids]</td>
<td>No</td>
<td>5/09</td>
<td></td>
<td>26.3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>8/09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No</td>
<td>11/09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stage 2* DBP</td>
<td>N/A</td>
<td>2/10</td>
<td>60.6</td>
<td>Ug/l</td>
<td>N/A</td>
<td>MCL=80</td>
<td>By-product of drinking water chlorination.</td>
</tr>
<tr>
<td>Sampling TTHM for IDSE</td>
<td>N/A</td>
<td>8/19/09</td>
<td>3.6</td>
<td>Colonies /100 ml</td>
<td>N/A</td>
<td>Running Annual Ave. &gt; 10</td>
<td>Untreated drinking water</td>
</tr>
<tr>
<td>Special disinfection byproduct monitoring</td>
<td>N/A</td>
<td>2/10</td>
<td>16.4</td>
<td>Ug/l</td>
<td>N/A</td>
<td>MCL=60</td>
<td>By-product of drinking water chlorination.</td>
</tr>
<tr>
<td>Stage 2* DBP</td>
<td>N/A</td>
<td>2008 Quartery Comp.</td>
<td>&lt;4.6</td>
<td>Pci/L</td>
<td>0</td>
<td>Combined with 226</td>
<td>Erosion of natural deposits</td>
</tr>
<tr>
<td>Sampling HAA5 for IDSE</td>
<td>N/A</td>
<td>2008 Quartery Comp.</td>
<td>&lt;3.6</td>
<td>Pci/L</td>
<td>0</td>
<td>5</td>
<td>Erosion of natural deposits</td>
</tr>
<tr>
<td>Special disinfection byproduct monitoring</td>
<td>N/A</td>
<td>2008 Quartery Comp.</td>
<td>7.6</td>
<td>Pci/L</td>
<td>0</td>
<td>50</td>
<td>Decay of natural deposits And manmade emissions</td>
</tr>
</tbody>
</table>

**Notes:**
1. Turbidity is a measure of the cloudiness of the water. We test it because it is a good indicator of the effectiveness of our filtration system. Our highest single turbidity measurement for the year occurred on 12/2/10 (0668 NTU). State regulations require that turbidity must always be below 1 NTU. The regulations require that 95% of the turbidity samples collected have measurements below 0.3 NTU.
2. The copper level presented represents the 90th percentile of the 10 sites tested. A percentile is a value on a scale of 100 that indicates the percent of a distribution that is equal to or below it. The 90th percentile is equal to or greater than 90% of the copper values detected at your water system. In this case, ten samples were collected at the Village of Watkins Glen Town of Dix water systems and the 90th percentile value was 12 µg/l. The action level for copper was not exceeded at any of the sites tested.
3. The lead level presented represents the 90th percentile of the 10 sites tested. A percentile is a value on a scale of 100 that indicates the percent of a distribution that is equal to or below it. The 90th percentile is equal to or greater than 90% of the lead values detected at the Village of Watkins Glen Town of Dix water systems. In this case, ten samples were collected at your water system and the 90th percentile value was 1.2 µg/l. The action level for lead was not exceeded at any of the sites tested.
4. Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
5. Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
6. Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
7. Some people who drink water containing trihalomethanes in excess of the MCL over many years may experience health problems with their liver, kidneys, or central nervous systems, and may have an increased risk of getting cancer.
8. Arsenic: NYS and EPA have promulgated a drinking water arsenic standard of 10 ppb. While your drinking water meets the standard for arsenic, it does contain low levels of arsenic. The standard balances the current understanding of arsenic, which is a mineral known to cause cancer in humans at high concentrations and is linked to other health effects such as skin damage and circulatory problems.
9. Some people who drink water containing trihalomethanes in excess of the MCL over many years may experience health problems with their liver, kidneys, or central nervous systems, and may have an increased risk of getting cancer.

**Definitions:**
- **Action level (AL):** The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.
- **Maximum Contaminant Level (MCL):** The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible.
- **Maximum Contaminant Level Goal (MCLG):** The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
- **Maximum Residual Disinfectant Level (MRDL):** The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.
- **Maximum Residual Disinfectant Level Goal (MRDLG):** The level of drinking water disinfectant below which there is no known or expected risk to health.
**Annual Drinking Water Quality Report for 2010**

**Village of Watkins Glen**  
303 North Franklin St.  
Watkins Glen, NY 14891  

(Public Water Supply Watkins Glen ID#4801188, Town of Reading #1 ID#4801186 & #2 ID4830034 and Town of Dix ID#4830037)

**INTRODUCTION**

To comply with State regulations, The Village of Watkins Glen, Town of Reading and the Town of Dix will be annually issuing a report describing the quality of your drinking water. The purpose of this report is to raise your understanding of drinking water and awareness of the need to protect our drinking water sources. In 2010 your tap water met all State drinking water health standards. We are proud to report that last year our water system did not violate any maximum contaminant level. This report provides an overview of last year’s water quality. Included are details about where your water comes from, what it contains, and how it compares to State standards.

If you have any questions about this report or concerning your drinking water, please contact Mr. Harley Connelly, Water Department Supervisor at (607) 535-6914 or 535-2736 during regular business hours. We want you to be informed about your drinking water. If you want to learn more, please attend any of our regularly scheduled village board meetings. The meetings are held normally the first and third Monday of each month at 7:00 PM at the Municipal Building at 303 N. Franklin Street. The Town of Dix board meetings are held on the third Monday of each month at 7:00 PM at 304 7th Street Watkins Glen board meetings are held on the first and third Wednesday of each month. The Town of Reading meetings are held on the second Wednesday of each month at 7:30 PM at 3914 Route 28.

**WHERE DOES OUR WATER COME FROM?**

In general, the sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and can pick up substances resulting from the presence of animals or from human activities. Contaminants that may be present in source water include: microbial contaminants; inorganic contaminants; pesticides and herbicides; organic chemical contaminants; and radioactive contaminants. In order to ensure that tap water is safe to drink, the State Health Department and the EPA prescribe regulations which limit the amount of certain contaminants in water provided by public water systems. The State Health Department’s and the EPA’s regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

The revised Source Water Assessment report was not available at the time of printing. This will be included in the Annual water report when the New York Department of Health completes it.

Our water source is surface water drawn from Seneca Lake, which is truly an excellent and clean source. During 2010 our system did not experience any restriction of our water source. The water is collected at the lake and pumped to the filtration plant located on Steuben Street. It is then put through the filtering process that includes treatment with Alum and Soda Ash. The water is then put through flocculation then filtration that include four reinforced concrete filter cells each with a filter area of 100 square feet designed for an approved filtration rate of 3 gallons per minute per square foot. Each filter cell contains thirty inches of dual media comprised of eighteen inches of anthracite and twelve inches of sand on a General Filter Co. multi-crete under drain system that includes media restraining nozzles.

The Village of Watkins Glen system serves a population of 2,149 through 943 metered service connections. The average daily usage for the year 2010 was 270,000 gallons and the total usage for the year was 99,222,000 gallons.

The Town of Reading district #1 and #2 serves a population of 86 through 40 metered service connections. The average daily usage for the year 2010 was 5,041 gallons a day and the total usage for the year was 1,840,080 gallons. The Town of Dix serves a population of 201 through 82 metered service connections in their water system. The average daily usage for the year 2010 was 20,995 gallons a day and the total usage for the year was 7,663,026 gallons.

**ARE THERE CONTAMINANTS IN OUR DRINKING WATER?**

As the State regulations require, we routinely test your drinking water for numerous contaminants. These contaminants include: total coliform, turbidity, inorganic compounds, nitrate, nitrite, lead and copper, volatile organic compounds, total trihalomethanes, and synthetic organic compounds. The table presented below depicts which compounds were detected in your drinking water. The State allows us to test for some contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of our data, though representative, are more than one year old.

It should be noted that all drinking water, including bottled drinking water, may be reasonably expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPA’s Safe Drinking Water Hotline (800-426-4791) or the New York State Department of Health Hornell Office, at (607) 324-8371.
MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contamination.

**Milligrams per liter (mg/L):** Corresponds to one part of liquid in one million parts of liquid (parts per million - ppm).

**Micrograms per liter (μg/L):** Corresponds to one part of liquid in one billion parts of liquid (parts per billion - ppb).

**Nanograms per liter (ng/L):** Corresponds to one part of liquid in one trillion parts of liquid (parts per trillion - ppt).

**Nephelometric Turbidity Unit (NTU):** A measure of the clarity of water. Turbidity in excess of 1 NTU is just noticeable to the average person.

**Non-Detects (ND):** Laboratory analysis indicates that the constituent is not present.

**Treatment Technique:** A required process intended to reduce the level of a contaminant in drinking water.

**Picocuries per liter (pCi/L):** Picocuries per liter is a measure of the radioactivity in water.

**WHAT DOES THIS INFORMATION MEAN?**

As you can see by the table, our system had no violations. We have learned through our testing that some contaminants have been detected; however, these contaminants were detected below the level allowed by the Environmental Protection Agency (EPA).

**IS OUR WATER SYSTEM MEETING OTHER RULES THAT GOVERN OPERATIONS?**

During 2010 The Village of Watkins Glen, Town Dix and Town Reading #1 and #2 are in compliance with all applicable State drinking water requirements.

**DO I NEED TO TAKE SPECIAL PRECAUTIONS?**

Although our drinking water met or exceeded state and federal regulations, some people may be more vulnerable to disease causing microorganisms or pathogens in drinking water than the general population. Immune-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice from their health care provider about their drinking water. EPA/CDC guidelines on appropriate means to lessen the risk of infection by Cryptosporidium, Giardia and other microbial pathogens are available from the Safe Drinking Water Hotline (800-426-4791).

**WHY SAVE WATER AND HOW TO AVOID WASTING IT?**

Although our system has an adequate amount of water to meet present and future demands, there are a number of reasons why it is important to conserve water:

- Saving water saves energy and some of the costs associated with both of these necessities of life;
- Saving water reduces the cost of energy required to pump water and the need to construct costly new wells, pumping systems and water towers; and
- Saving water lessens the strain on the water system during a dry spell or drought, helping to avoid severe water use restrictions so that essential fire fighting needs are met.

You can play a role in conserving water by becoming conscious of the amount of water your household is using, and by looking for ways to use less whenever you can. It is not hard to conserve water. Conservation tips include:

- Automatic dishwashers use 15 gallons for every cycle, regardless of how many dishes are loaded. So get a run for your money and load it to capacity.
- Turn off the tap when brushing your teeth or shaving.
- Check every faucet in your home for leaks. Just a slow drip can waste 15 to 20 gallons a day. Fix it up and you can save almost 6,000 gallons per year.
- Check your toilets for leaks by putting a few drops of food coloring in the tank, watch for a few minutes to see if the color shows up in the bowl. It is not uncommon to lose up to 100 gallons a day from one of these otherwise invisible toilet leaks. Fix it and you save more than 30,000 gallons a year.
- Use your water meter to detect hidden leaks. Simply turn off all taps and water using appliances, then check the meter after 15 minutes, if it moved, you have a leak.

**CLOSING:**

Thank you for allowing us to continue to provide your family with quality drinking water this year. We ask that all our customers help us protect our water sources, which are the heart of our community and our way of life. Please call our office if you have questions.
From: "Gita Devi" <gdevi@lightlink.com>
To: "David Bimber" <r8dep@gw.dec.state.ny.us>
Date: 9/26/2011 4:01 PM
Subject: Feedback on Inergy's planned LPG storage facility in Watkins Glen, NY

Dear Mr. Bimber,

My name is Gita Devi and I live in the town of Reading. I also run a small bed and breakfast in the town so I am directly affected by the LPG storage project. I have many concerns about this project: safety, environmental impact and negative impact on our growing tourism/winery businesses. Outlined, below, are some of my concerns.

1. I want Inergy to provide, in advance of receiving a permit, their contingency plans for all potential accidents, both minor and major. It is inconceivable that this is not a requirement and I ask the DEC to impose this restriction on Inergy. Most major accidents have occurred within salt cavern storage facilities and Inergy's lack of experience managing a project of this scope is troubling.

2. I want to know if the town of Reading and surrounding towns are capable of handling a major disaster, given our volunteer fire and EMT services. Where will the water come from in the case of a major fire? We have mostly well water.

3. I want to know in advance where people and companion animals and farm animals would be relocated in case of an evacuation. I don't want to find out during an accident that there is no where to go that will take me and my pets.

4. I want to know what Inergy's real plans are for future expansion. They say one thing to the DEC, another on their web site and yet another on their IPO.

5. I want to know if the trestle bridge in Watkins Glen State Park really is capable of handling the increased rail traffic. I cannot imagine the environmental impact should a car derail.

6. I want to know the level of expected truck and train traffic and the hours of operation. My B&B guests are already complaining about the truck traffic in Watkins Glen. And the noise from trucks traveling along routes 14 and 14A are already noticeable at night.

7. I want to know why Inergy would not consider moving the brine pond to another location when asked to do so by both the Reading Planning Board and the DEC. I fear for the future of Seneca Lake and the health of area residents should a leak occur. Seneca Lake provides drinking water for more than 100 thousand people.

8. I am concerned that the level of VOC's put out by diesel trucks will negatively impact the grapes and our winery business.

9. I am concerned that allowing Inergy to get their foot in the door will only open the region up to future drilling, gas exploration and could spell the end of our burgeoning tourism/winery businesses which bring in hundreds of millions of dollars in revenue.

10. The wineries are open year-round so Inergy's claims that since most of their truck/train traffic will take place during the winter and will not affect tourism is inaccurate.

11. I am not convinced that this industry will result in increased revenues or lower propane prices. Inergy has already been taken to court for price gouging.

12. Should an evacuation take place, would I be compensated for lost business since my B&B would be closed down due to outside forces?
Thank you for your time and consideration.

Gita Devi

The Ginger Cat Bed & Breakfast and Devi Designs
www.gingercat-bb.com | www.devidesigns.biz
607.535.9627
508.404.6271 - cell
eFax: 1-208-723-0159
September 20, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

I am writing this letter in support of the Finger Lakes LPG Storage Project that has been proposed in the Town of Reading. I am a long time resident of the Town of Reading (I live about 3 miles from the proposed site) and fully support the positive impact this facility will have on my community and our economy.

After reviewing the facts of this project I am confident that Finger Lakes LPG Storage has taken every precaution to ensure the safe operation of this facility and the protection of the environment. Underground storage has been conducted safely in this area for over 40 years and there is no reason to think that will change with the approval of this project.

With so many businesses leaving New York State over the past several years and the failing state of our economy, it is important to keep profitable businesses in our area. The Finger Lakes Project, with its $40 million investment, will create 8-10 permanent well-paying, full-time jobs with benefits and over 50 construction jobs for members of our community. In addition, our school district, county and town will receive property tax income paid by Finger Lakes.

The Project will also benefit all of the many users of propane in this area. With increased propane storage available, the cost of propane will be reduced which means more money for families. All of these can only have a positive impact on the community's economy.

As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

Frank Pastore
September 23, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

I am an employee of US Salt. I am writing this letter to the DEC to show my support for the Finger Lakes Storage Project proposed in the Town of Reading, New York.

The development of the Finger Lakes Storage Project will provide a boost to the local economy without negatively affecting the community and surrounding area. Many people in Schuyler County, as well as surrounding counties use propane. In the past, the cost of propane has gone up during the winter months because its demand is greater than the area’s storage capabilities. The Finger Lakes Storage Project will provide additional propane storage for the surrounding companies and thereby reduce the cost that customers have to pay in the winter months.

Construction of the project will provide needed jobs for the area and as many as 10 permanent good paying jobs with benefits. From my experience with Inergy, the Project will be constructed and will be operated in such a way that it will have no negative impact on the area.

In fact, the project will hardly be visible to people and because the LPG will be delivered via pipe and rail, traffic through the Village of Watkins Glen will actually be reduced. Finger Lakes Storage has taken great care in ensuring that safety measures are put in place to protect against any negative impacts (i.e. emergency procedures, monitoring and testing, brine pond repair and replacement procedures, etc.) and the fact that similar storage has occurred at this location for the past 40 years shows that the benefits of this project far outweigh the unlikely potential of any impacts.

I strongly urge the DEC to allow construction of the Finger Lakes Project and fully support its development. Thank you for your time.

Deborah S. Baldini
4889 Oak Rd 125
Campbell, NY 14821
September 22, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

I am writing this letter in support of the Finger Lakes LPG Storage Project that has been proposed in the Town of Reading. I am a resident and long time member of the Watkins Glen community and fully support the positive impact this facility will have on my community and our economy.

With so many businesses leaving New York State over the past several years and the failing state of our economy, it is important to keep profitable businesses in our area. The Finger Lakes Project, with its $40 million investment, will create 8-10 permanent well-paying, full-time jobs with benefits and over 50 construction jobs for members of our community. In addition, our school district, county and town will receive property tax income paid by Finger Lakes.

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As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

[Signature]

NYSDEC OHMS Document No. 201166576-00005
September 22, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

William Clark
2449 Johnson Rd
Horseheads NY 14845

Will A Clark
September 22, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

I am writing this letter in support of the Finger Lakes LPG Storage Project that has been proposed in the Town of Reading. I am a resident and long time member of the Watkins Glen community and fully support the positive impact this facility will have on my community and our economy.

With so many businesses leaving New York State over the past several years and the failing state of our economy, it is important to keep profitable businesses in our area. The Finger Lakes Project, with its $40 million investment, will create 8-10 permanent well-paying, full-time jobs with benefits and over 50 construction jobs for members of our community. In addition, our school district, county and town will receive property tax income paid by Finger Lakes.

The Project will also benefit all of the many users of propane in this area. With increased propane storage available, the cost of propane will be reduced which means more money for families. All of these can only have a positive impact on the community’s economy.

As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

Josh Styczynski
13 Genesee Ave. #2
Binghamton, NY 13903
September 30, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

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September __, 2011

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Sincerely,

[Signature]

[Name]
September 26, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

Leslie Lawrenson
September 24, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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John Morrison
The following is a comment I would like to make on the future project proposed in Schuyler County. My name is Richard Churches. I have been in emergency services in the county for more than forty years. When I first entered the service in 1966 the gas storage operation at Reading Town was already in operation. To my knowledge we have had no major incidents at this facility and they have been very open and cooperative partners in the operation. Accidents happen and that is why I and my brother and sisters in the emergency services stay busy. I have been a Deputy in Emergency Management and the Director and currently hold a Deputy position in Emergency Management. The organizations have continually had Schuyler county local and State responders educated to handle emergencies at this installation. They have over the years made us feel very comfortable with the product they handle. Every day transportation passes through Schuyler County and handles a large variety of hazardous material. Any one of these could cause a major incident that could interrupt our way of life for many years. There used to be radio active material moved over rail and trucks when Romulus was an active base. No one really knew what was traveling the roads and rails.

If we as a nation are to survive and run our businesses, farms and schools we need energy to do this. Responsible vendors of this energy must be allowed to produce and store these products so we can continue to operate as a nation. People make errors and we can't change that. Nature causes chaotic situations as we have recently seen in the state. But what are we to do if we can't have nuclear, fossil fuel, wind, or gas fired plants to give us electricity to continue to produce grapes, wine, salt, farm products and everything else we depend on.

The best we can do is to make the process as safe and responsible, and as transparent as we can allow to make us all live and be able to conduct our business daily. The companies that have worked at the Seneca Lake installation in my opinion are such an organization. We must trust the process and continue to monitor as we would any industry. There is no 100% guarantee for anything we do that can't fail at some point. But if we continue to monitor and maintain our systems that produce, store
and distribute energy accidents can be avoided. This is a project we all need and should continue. thank you for your time.

Richard Churches

Deputy Emergency Management
Schuyler County

Deputy Chief Odessa Fire Department

Past President and EMT with Schuyler Ambulance
September __, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Dear Mr. Bimber:

As an employee of US Salt, a member of United Steel Workers Local 12460-4, and a longtime resident of the area, I fully support the Finger Lakes LPG Storage Project located in the Town of Reading.

Living in the area, the protection and safety of my community is very important to me. From everything I know and have read, Finger Lakes LPG Storage has taken every precaution to ensure the safe operation of this Facility, including the safety of Seneca Lake. In addition to the many safety controls that have been put in place (cavern integrity testing, emergency shutdown procedures, pressure monitoring, etc.), Finger Lakes has developed operational and safety manuals to ensure the safety of its workers and respond to accidental releases. The Facility, including the brine pond, has been engineered in such a way to avoid impacts to Seneca Lake and the surrounding area. A brine pond embankment will prevent a breach of the pond, the pond will be constructed with a double liner and include a leak detection system, and the brine level will be monitored daily. In addition, repair and replacement procedures have been put in place.

Underground storage has been conducted safely in this same area for over 40 years and as an employee of US Salt, I feel confident that the proposed Finger Lakes Storage Facility is not a safety hazard to my community and I fully support its development. Thank you.

My name is Byron Thompson,  
I have been in this community since birth,  
I am a Rescue Capt. + Firefighter + Emt-D about 20 yrs  
I am the union President local 12460 at US Salt LLC  
I am a member of Schuyler County Critical Stress Team,  
Rope Rescue Team, Confined Space Rescue team and more. I have been at US Salt for almost 36 yrs and being in the Fire Dept. have not had any calls for the Gas Storage. I strongly support this Development. Thank you Byron Thompson.
September 23, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

I am an employee of US Salt and a member of United Steel Workers Local 12460-4. I am writing this letter to the DEC to show my support for the Finger Lakes Storage Project proposed in the Town of Reading, New York.

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Construction of the project will provide needed jobs for the area and as many as 10 permanent good paying jobs with benefits. From my experience with Inergy, the Project will be constructed and will be operated in such a way that it will have no negative impact on the area.

In fact, the project will hardly be visible to people and because the LPG will be delivered via pipe and rail, traffic through the Village of Watkins Glen will actually be reduced. Finger Lakes Storage has taken great care in ensuring that safety measures are put in place to protect against any negative impacts (i.e. emergency procedures, monitoring and testing, brine pond repair and replacement procedures, etc.) and the fact that similar storage has occurred at this location for the past 40 years shows that the benefits of this project far outweigh the unlikely potential of any impacts.

I strongly urge the DEC to allow construction of the Finger Lakes Project and fully support its development. Thank you for your time.

[Signature]

Corey Stanton
September 22, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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I strongly urge the DEC to allow construction of the Finger Lakes Project and fully support its development. Thank you for your time.

The GAS storage has been around here for years!

Thank you,

Bruce Johnson
September 24, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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[Signature]
September __, 2011

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New York State Department of Environmental Conservation
Region 8
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I strongly urge the DEC to allow construction of the Finger Lakes Project and fully support its development. Thank you for your time.

Sincerely,

James C. States

Union member
September 24, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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I strongly urge the DEC to allow construction of the Finger Lakes Project and fully support its development. Thank you for your time.

[Signature]

[Handwritten Signature]

NYSDEC OHMS Document No. 201166576-00005
September 26, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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I strongly urge the DEC to allow construction of the Finger Lakes Project and fully support its development. Thank you for your time.

Sincerely,

Susan Oliver  
Bath, NY
September 23, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

As an employee of US Salt, a member of United Steel Workers Local 12460-4, and a longtime resident of the area, I fully support the Finger Lakes LPG Storage Project located in the Town of Reading.

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Thank you.

[Signature]

Robert C. Luck
September 23, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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[Signature]
September __, 2011

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Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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Scott Crane
September 23, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

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Thank you.

[Signature]
September 28, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Dear Mr. Bimber:

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[Signature]

NYSDEC OHMS Document No. 201166576-00005
September __, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

[Signature]

Loleta K. Fulkeron
September 23, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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Raymond A. Smith
September 24, 2011

Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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Underground storage has been conducted safely in this same area for over 40 years and as an employee of US Salt, I feel confident that the proposed Finger Lakes Storage Facility is not a safety hazard to my community and I fully support its development.

Thank you.
September 24, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9516

Dear Mr. Bimber:

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[Signature]
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

My wife and I grew up in this area and left the area just over 40 years ago to areas where we could pursue careers not available to us here at that time. We returned to the area about 6 ½ years ago to start up two (2) businesses in an area that we felt was and is on of the most beautiful and serene areas of the country. We have invested everything we have into these businesses, a surveying business and a Bed & Breakfast; both very successful businesses. By allowing this facility to store LPG together with all of the truck traffic generated, we feel that this will devastate our businesses (primarily the Bed & Breakfast). About the only negative comment we receive in reviews from our guests at the Bed & Breakfast is that there is "so much truck traffic". And this is without the Inergy LPG Project!

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak? The current truck traffic we have now is destroying our highways at a faster rate than New York State can afford to repair them.
Will Energy pay for the repairs or upgrades to our highways that are needed? Of course not! New York State will and the State can not repair them now.

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?
What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the
ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**
Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

We respectfully request that this project as proposed by Inergy be Denied on due to the Fact that this project will have Adverse and Negative Impacts on both the Environment and on the Community as a whole.

Thank you for considering my concerns and suggestions,

Thomas G. Merrill
Professional Land Surveyor
Mr. David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516  

Dear Mr. Bimber:

I am writing this letter in support of the Finger Lakes LPG Storage Project that has been proposed in the Town of Reading. I am a resident and long time member of the Watkins Glen community and fully support the positive impact this facility will have on my community and our economy.

With so many businesses leaving New York State over the past several years and the failing state of our economy, it is important to keep profitable businesses in our area. The Finger Lakes Project, with its $40 million investment, will create 8-10 permanent well-paying, full-time jobs with benefits and over 50 construction jobs for members of our community. In addition, our school district, county and town will receive property tax income paid by Finger Lakes.

The Project will also benefit all of the many users of propane in this area. With increased propane storage available, the cost of propane will be reduced which means more money for families. All of these can only have a positive impact on the community's economy.

As a long time resident of the Watkins Glen community I support the positive economic impact the Finger Lakes Storage Project will have on this community and urge the DEC to allow its development. Thank you.

Mr. Bimber,

Although this is a form letter, it succinctly states how I feel. Approve the project please.

Mrs. Kim Kaarsen
From: elizabeth chiron <bethchiron@gmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 9/29/2011 12:35 PM
Subject: public comment on LPG storage project, reading, ny

Mr. Bimber, and other officials at the NYS DEC,

Isn't it interesting how about 800 (concerned, angry even) people showed up at the hearing the other night- people who now KNOW about the project, and the only reason they know is through citizen efforts to get the word out. *No body knew about this project by the time the first public comment period expired. I am sure the DEC was well aware of that, as certainly was Inergy and town officials.
Anyway, this project serves the financial needs of a handful of people and will destroy the drinking water, immediate environment and the tourist economic base of this town, JUST as it has already done to many many other towns, some not far from here in PA. The Department of Environmental Conservation. Really? Sure looks like something of a bad joke these days. Our environment has been sold. Up the river.
My husband and I are moving to North Carolina where there is no Marcellus Shale to exploit and pump poison into. This issue has completely removed any ounce of trust I have held in public officials- at all levels. The gas and oil industry owns this country and it's administration. I hope you don't have children that you love that will be drinking the byproduct that will be known as drinking water soon left everywhere this industry has hit. I do. What your agency and the EPA are allowing is criminal behavior.

Sincerely,

Elizabeth Chiron
From: Lester Andrew <lesmaoptions@yahoo.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 9/29/2011 12:36 PM
Subject: LPG storage on 14/14a above Seneca Lake

Dear Sirs. The storage of LPG and the trucking and RR activity will greatly change the Tourist, Winery and Lake activity. We Strongly oppose your entire activities in our area. Please go some where else. Les & Kae Andrew 121 N. Glenora Rd. Dundee, NY 14837
Dear Deputy Bimber,

I write you as a New York state citizen to express my opposition to the proposed LPG facility. Over the last 50 years, upstate NY has suffered from significant job losses as a result of the shrinking of a number of large employers. But throughout all of this, a vibrant tourism industry has thrived across the beautiful Finger Lakes. Please don't jeopardize this industry in return for such an insignificant benefit.

Thanks for your time.

Chris Slechta
From: "Samuel J. Maggio" <sam@icm.cc>
To: <dlbimber@gw.dec.state.ny.us>
Date: 9/29/2011 1:07 PM
Subject: Comment On Proposed INERGY LPG Facility
Attachments: NO LPG FACILITY Speech.doc

Dear Mr. Bimber---

Thank you for attending the DEC hearing in Watkins Glen Auditorium on Tuesday, September 27th and for staying to listen to some of our concerns. I am confident you will agree the people of our region overwhelming disapprove of this INERGY proposal while the very few who spoke in favor of it were primarily people who derive paychecks from INERGY.

Attached is the "comment" I hoped to deliver that night, however there were so many people who signed up to provide public comment it was obvious only a fraction of the people who wanted to speak could in the time allotted.

I hope, at the very least, the DEC will hold a second public comment opportunity and that you will consider extending the public comment period.

This IS the biggest regional issue we face. It is also the most concerning issue we face. The local citizens and businesses need to be heard. And, the DEC needs to clearly hear that we oppose INERGY's plans to make our region the industrial hub for gas storage and distribution. We not only oppose this INERGY plan for industrialization, we oppose it strongly, and for many valid reasons.

Sincerely,

Samuel J. Maggio
Finger Lakes Resident
Millport, NY 14864
(see attached)
NO LPG FACILITY

My name is Sam Maggio. I live within a few miles of the proposed LPG facility.

I was born in upstate NY and have been the president and CEO of a number of start-up and High tech companies. I hold several US and International patents on commercialized technologies. My expertise spans both chemical and mechanical engineering although most of my work has been as a Corporate leader and business owner.

Today I’ll focus the very short amount of time I have at this hearing to dispel a far too common myth that is perpetuated by those who support this LPG Facility on Seneca Lake. The myth goes something like this—“We have science and facts on OUR SIDE and those who oppose the facility only have emotions on their side.”

Interestingly and tellingly, after many months of attending meetings, reading reports, evaluating just what is being said there are TWO PRIMARY CLAIMS the PRO INERGY FACILITY people are making: (1) “This LPG Facility will create good Jobs for local people” and (2) “The Gas is to be stored so far underground it is totally safe. It’s way down there. Don’t worry!” What should be obvious to any dispassionate mind is --- Both of INERGY’s claims are actually highly “emotional” in nature and I would like to use some “science and facts” to test their validity.

NUMBER ONE---The promise of good JOBS for local people. Experts ARE needed to run this LPG facility and they will have to come from TEXAS or some other state that HAS these types of facilities. Local people do not have the experience and this is no place for “ON THE JOB TRAINING”... Thus, if INERGY is to do what is BEST for the safety and proper operations of this facility they must GO to TEXAS or elsewhere to get the people, if they instead try to placate us with local inexperienced people they would possibly jeopardize everything, so we all know what they must choose: Outsiders. Therefore, the promise of good JOBS for locals can and should be disregarded. And it is dishonest. Clearly, INERGY is playing into our emotions when they assert they will give us good jobs.

NUMBER TWO---The argument that the Gas will be stored so far underground there is absolutely nothing to worry about -- is a red herring. Most who oppose this facility have stated that our concerns primarily deal with those operations where the greatest statistical possibility exists for leaks, pollution, accidents or catastrophes---the Pipes, the Transfer Station, the casings beneath the valves, the pumps, the trucks, the rails, the BRINE PIT, etc. By INERGY claiming science and facts are all on THEIR side yet in using the argument that the gas will be stored so far in the ground that the WHOLE OPERATION will be totally safe, not to worry, is increasingly being seen as a strategic AVOIDANCE of the issues that we keep raising! And it is a deceptive tactic that shifts the scrutiny away from THE MOST valid concerns and replaces it with a feel good and delusional depiction of this facility and all its associated industrial activities.

May I remind this room----The GAS does not make INERGY any money if it just stays WAY DOWN THERE, DEEP, thousands of feet underground (where ENERGY claims it is so safe). INERGY makes money when they PUMP it UP and MOVE IT OUT, put it in trucks
and railcars, and pump in MORE, and when they do those operations A LOT! Everyone knows this! And we all know the proposed project is all about MAKING A LOT of money for INERGY. Thus, the INERGY argument that the GAS will be way, way down in the ground, so don't worry---is a highly disingenuous tactic of diverting attention away from the concerns of significance!

Moreover, the fact that it is PRECISELY all the top side industrial processes that make INERGY money---astoundingly the processes INERGY chooses to ignore---this should make us all concerned regarding WHAT PRIORITIES this company actually has if they keep ignoring the biggest safety concerns!! Their use of a RED HERRING should be a massive RED FLAG to all of us in our community and to the DEC!

So, referring back to the first claim about JOBS --- INERGY has forwarded a highly emotionally charged argument that they will give us good jobs. Clearly this is a falsehood.

And referring back to claim two: INERGY telling us we all have NOTHING to fear---because the GAS will be way, way down there underground!---Again, an unabashed EMOTIONAL argument that is deceptive with no basis in fact because to make INERGY all that money they tell their investors they will be making, they need the GAS FLOWING in great volumes and with complex, heavily polluting, highly INDUSTRIALIZED, HIGHLY DANGEROUS, top-side processes.

And there are many other matters of grave concern with the proposed facility---yet my time is far too short to delve into these... However, in just deliberating these two claims and after extensive review of the LPG proposed facility on Seneca Lake---in the heart of the Finger Lakes---I have concluded the proposed project is being sold to us all by a company that cannot be trusted. The evidence clearly shows INERGY’s management has been less than honest----telling one story to the general public and the DEC, while telling a totally different story to their investors. Around here in the Finger Lakes we call that LYING. ...Thus there is only one conclusion based on the facts and devoid of emotion that the DEC must make--- Do NOT allow INERGY to proceed with their plans for a massive LPG / GAS storage facility on Seneca Lake. They have broken our trust. And when a company breaks trust, it is NOT an emotional decision to tell them they cannot proceed. It is an intellectual and pragmatic decision and one that needs to be made to protect the people, the economy, and the well being of The Finger Lakes of New York State. The REAL Finger Lakes.

Respectfully Submitted,
Samuel Maggio
Millport, NY 14864
I am opposed to this facility approval because:

Adding 4 heavy trucks per hour to traffic in Watkins Glen and adjacent highways will be disrupting to locals and will discourage tourists.

One hundred rail cars per day is huge in terms of destroying the rural atmosphere that attracts tourists.

The endeavor is said to bring in 10 new jobs. The negative impact on tourism will obliterate many jobs now in existence.

Devastating gas accidents have occurred. The Company can only address the causes of those that have already happened. No one can foresee the glitch that will create the next one.

The response of the CEO of Energy to the question of safety in the salt water pond was flippant: "One million gallons of salt water into Seneca Lake is nothing for its ten trillion gallons". That tells me that the Company has no true regard for the safety and welfare of the local inhabitants. It can also be said that an explosion costing a million dollars is nothing to that Company. But if it razes my house, it is essentially all there is for my family.

Consider that thought: Anything going wrong is nothing to a huge organization. That same wrong may be all we own for an individual.

Sincerely

Renato H Rojas, MD
4055 Chase Road
Burdett NY
607-739-8819.
From: richard tiffany <tiff@htva.net>
To: <dlbimber@gw.dec.state.ny.us>
CC: <ret@htva.net>
Date: 9/29/2011 4:04 PM
Subject: lpg storage

sir, my name is richard tiffany, and i have lived in the finger lakes all my life. i'm 66 and have been lucky enough to realize my dream of retiring on seneca lake near himrod. i am opposed to the lpg storage plan. my reasons are many, but most compelling is the fact that it is the wrong place for this activity. its location near the village and lake are inappropriate for an industrial process with inherent dangers. please tell inergy to find another site. thank you.

richard tiffany
3517 shingle point road
himrod, ny
14842
Deputy Regional Permit Administrator
c/o NYSDEC
6274 East Avon – Lima Rd.
Avon, NY 14414-9516

David L. Bimber:

I had a wonderful day today. I am a volunteer at The Wine Center at Sonnenberg Gardens in Canandaigua. This facility raises money for this non-profit by showcasing wines exclusively from the Finger Lakes Region of NYS. I met travelers from CA, WI, MI, NJ, PA and NYS today. Without exception, these travelers were in love with the Finger Lakes Region. Most said they looked forward to a return trip and all said they would share the news of this “gem in NYS.”

My wonderful day was shattered when I returned home at 2 pm and read the article in the Democrat & Chronicle – “LPG storage faceoff today.” I urge you to strongly consider the implications of going forward with such an idea. This area has over the past 40 years done a remarkable job of both promoting its great tourism opportunities and protecting the environment. Placing a liquid petroleum storage area adjacent to Seneca Lake is madness. The environmental risks are too great and the blot on tourism is economically unsound.

We must consider our future and not be caught up in the greed of this century. I am sure you have heard the argument, “They promised us that drilling in the Gulf was safe.” This is not just rhetoric; energy companies are interested in returning profits to their shareholders. We, the people of the Finger Lakes and NYS are interested in quality of life and protecting our environment for our children, grandchildren and beyond.

Please, think about what the residents of the Finger Lakes want and need. It is NOT, Inergy from Kansas City, Missouri spending big corporate dollars to store gas in NYS. To use another overused but true adage, “Would they want it in their backyard!!” What the citizens want is what we currently have: clean air, clean water, gorgeous countryside, clean industry and tourism.

Sincerely,

Doug Daniels

5030 Butler Rd.
Canandaigua, NY 14424
September 27, 2011-09-27
Dear Mr. Bimber,

Thank you for the opportunity to help inform you on this vital issue.

We live in the Finger Lakes area and have enjoyed it for many years. I've taught at SUNY Geneseo and at FLCC for several years.

I attended the Watkins Gen session last night with my husband and a few friends.

Here are my concerns:

1. The few years (20) that the LPG company used in their calculations on risk is not adequate regarding earthquake damages. As you know we had an Eastern Seaboard quake in Aug. that ran for hundreds of miles.

2. One of LPG business officials said during a radio interview on the morning of the 21st of September, "If it breaks it doesn't matter because Seneca Lake has trillions of gallons of water."

   a) Thousands of people get their drinking water from Seneca Lake.

   b) Many hundreds of dairy farms and horse farms get their water from the lake.

   c) Many wineries irrigate their grape vines with lake water in dry seasons. (Can't use brine).

   d) Fish and other water animals would be killed if pollution entered the lake.

3. We want tourism and wineries to continue.
We request an impartial 3rd party to do a risk analysis of this proposed change to our area. An honest analysis.

We further request a limit on future expansion. If a permit is allowed, there must be an enforceable clause that states that no expansion shall occur 5 years down the line. This is not present in their documents.

The company must be held totally responsible for accidents, spills, bridge ruptures etc, and that is not included in their documents.

Basically, as you already know, we don't want it. It carries way too much risk for people, animals, grapevines, and our environment, in general. We all need clean water and clean air to live.

Thank you for considering these issues seriously.

Sincerely,

Elizabeth daCunha
& family
Dear Mr. Bimber,

As a lifelong resident of Watkins Glen for 65 years I believe adding additional propane storage would be a serious short and long-term mistake.

For the first time in my lifetime Watkins Glen and the area around the lake are full of positive activity and tourist trade. All aspects of propane storage will have a negative impact on current and potential business.

Over the long term no matter what the safety precautions there will be and unexpected and unplanned for event that will damage all aspects of this area.

Thank you for your consideration.

Sincerely,

M.E. Bishko
Deputy Regional Permit Administrator
40 NYSDEC
6274 East Avon-Lima Road
Avon, N.Y. 14414-9516

Mr. David L. Bimber:

The recent article in the Sept 27, 2011, D&C newspaper informing us of Energy plans to build a six track railroad siding, capable of loading and unloading 24 rail cars within 12 hours, and also to incorporate a truck loading station, capable of loading four trucks per hour, caused us grave concern, dismay and anxiety. Why? Because we live within the village of Watkins Glen on Route 14 about 10 miles from the Propane Natural Gas Storage Facility in the town of Reading. Truck traffic comes right past our home and the loud noise from applying brakes going down the hill into Watkins Glen is intolerable now. Imagine how much worse it will become with more truck traffic added to the present unbearable situation. Unfortunately, all these trucks must come through the village of Watkins Glen complicating the traffic and increasing the noise pollution.

Seneca Lake is well known for its natural scenic beauty and has many tourist attractions: spectacular gorges, numerous and famous wineries, lake cruises, boating, fishing, swimming, water sports. Many visitors come to the area at harvest time for the bounty of its fruits and vegetables and for its splendid fall colors. We view this project as adversely affecting and seriously impacting these priceless interests for which our region is already a drawing card.

We recently experienced a small earth tremor here and we fear that future occurrences could rupture the integrity of the underground caverns storing the liquid petroleum gas and result in an horrendous natural catastrophe for our region. We insist that Energy perform a complete qualitative and quantitative assessment and risk analysis, so as to avoid any disasters for our community.

Thank you,

Richard J. Beligotti
204 Reading Rd.
Watkins Glen, N.Y. 14891
I am writing you about my concerns with the proposed LPG storage facility in Reading, NY. My concerns are in the following areas:

1. Evacuation Plan in the event of a failure
   a. How will the residents in the area be notified if a failure occurs?
      i. Mennonite families do not have phones to receive reverse 911 notification, how would they be notified?
      ii. Watkins Glen has removed their fire siren, how would residents be notified in the event of a failure?
      iii. Does the evacuation plan include all public gathering places like churches and Mennonite schools, so notification would include these places?
   b. How would mass evacuation of events in Watkins Glen be conducted?
      i. Events like the Vintage Car Race draw thousands of spectators to downtown Watkins. The main street in town is blocked off, causing traffic backups.
      ii. How would the Watkins Glen Race track be evacuated if a rail car caught on fire near the track? Has Watkins Glen International input to the evacuation plan?
      iii. There are also Italian Festivals, Cardboard Boat Race and other events in Watkins. Are these included in an evacuation plan?
   c. Will the public schools in the area be required to have buses and bus drivers available to evacuate the schools?
   d. Will the farms in the potential blast zone be required to have a plan to evacuate their animals?
2. Brine pond
   a. Will the brine pond be covered to keep birds from being killed?
      i. It has been stated that the brine pond would cause birds to die if they landed in the pond. Have any studies been done on how this might affect the migratory birds that travel through the area?
      ii. DEC supports a marshland in Watkins Glen to attract birds. Is the brine pond going to cause an adverse affect on the existing marshland bird area, by causing harm to the birds that might land in the pond? Why attract them in one area, and 7 mile away kill them?
      iii. Are there any endangered birds like the Snow Geese which could be harmed by the brine pond? Snow Geese often land on Seneca Lake.
   b. What is the surface area under the proposed brine pond? Is it glacial fill? Putting weight on glacial fill on a slope is not a good idea.
   c. The earthquake that occurred in Virginia was felt in upstate NY. What effect would it have had on a brine pond? Is the pond earthquake proof and to what level?
3. Increased traffic
   a. How many structurally deficient bridges besides the bridge to Route 14a off Route 14 will see increased truck traffic? Putting additional potentially explosive traffic on structurally deficient bridges does not seem like a good idea to me.
   b. What is the impact on traffic with the LPG trucks going through Watkins Glen when the Vintage Car Race is going on and the main street through town is closed?
   c. Will there be adequate exits off Route 14 to accommodate trucks turning into the storage facility? Trucks turning into the existing facility sometimes tie up traffic, and the new facility would have more trucks. Trucks traveling north on Route 14 get into the left lane going up the hill from Watkins Glen and travel at below the speed limit.
4. Property Value
a. There are already numerous properties for sale near the proposed site. How will the value of neighboring properties be affected by the LPG facility?

5. Increased railroad traffic

a. Have any studies been done to measure traffic on the numerous ungated railroad crossings in the area to determine how increased railroad traffic would affect the safety of the crossings?

b. Have public gathering places like Watkins Glen State Park and Race Track which are near railroad lines, been included in safety studies?

6. Aesthetic Beauty

a. The Finger Lakes are beautiful. Adding unsightly brine pond, railroad yard, and storage facility will harm the beauty of the region. Has any thought been given to move the brine pond away from the main thoroughfare and put it on level ground for safety reasons?

Regards,

Barbara Tiffany
3715 Shingle Point Road
Himrod, NY 14842
To All Concerned;

I am writing in regards to the purposed Finger Lakes LPG storage facility and I would like to voice my concerns. I have been born and raised on Seneca Lake and I fear that by allowing this facility to be built my hometown will never be the same.

Why has there not been an outside QRA Quantative Risk Assessment been performed to determine the full risks that Seneca Lake, the environment, the tourism industry, and how our way of life will be affected in the long term by this project? Why are we only looking at the money aspect and not the future of our town and the people who have invested their lives into maintaining the natural beauty that surrounds the Finger Lakes? I fear that we are not going to be able to fix the problems that result from this facility and no one is looking at the future problems they are only looking for instant gratification. Where is the safety evaluation that discusses the affects of leeching from the salt caverns?

Speaking of safety we recently had a minor earthquake that affected the east coast. What will happen if an earthquake hits the fault lines that are very close to where the facility is being placed? If there is any chance that brine could end up in Seneca Lake this project should not exist on our lake or any other area of the Finger Lakes. Another natural disaster that has not been taken into full consideration is flooding. If the brine pond overflows or leaks there is no real safety plan or measures that have been established to handle this catastrophe and how we will recover from this?

Please do not allow the LPG storage facility to be created and to become a propane hub in the center of New York State. We do not need it in the Finger Lakes and we do not need to risk our lakes, our land and our way of life for only 10 new jobs in our area. Money is NOT everything but protecting my home's natural beauty is everything to me.

Sincerely,

Kylie Rodrigues
Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world. Among the many concerns I have, the socio-economic, agricultural and environmental issues remain paramount.

My family owns and operates a small farm winery. Rasta Ranch Vineyards is on the East side of Seneca Lake in an ever growing wine industry. We are surrounded by vineyards and wineries in the heart of The Finger Lakes Region. Almost everyone I know works in this, or another agricultural or service industry, in one capacity or another. The heart of The Finger Lakes thrives on a healthy enough environment to produce food: grapes, peaches, corn, greens, dairy and meat among many others. The heart of The Finger Lakes thrives on a healthy enough service and tourism industry to sell these agricultural products.

The wine industry has proved itself as a sustainable, wild success in New York State. Rasta Ranch Vineyards for example, established the winery in 1993, opened the tasting room in 1995, and has increased profits and production annually ever since. This is just one of many wine industry successes.

Here on Seneca Lake we tout some of the best whole foods restaurants, dedicated to offering local, fresh, healthy and often organic, options. Several CSA’s supply full month supplies of healthy fruits, vegetables, meats and dairy products to families locally. Many of the large selection of Bed & Breakfasts serve locally grown foods.

Thousands of people travel from New York City, Rochester, Syracuse, Binghamton, Pennsylvania, Ohio, New Jersey, Connecticut, South Carolina, Canada, all over, just to visit our wineries, gorges, restaurants, and our lake. The past several years have brought a crippling recession across The United States of America, much of the country has suffered great financial hardships. This area has been fortunate enough to, in large part, avoid these woes. Wineries are still packed, in fact, business has been better than EVER during the “Recession”. The Watkins
Glen State Park has just bragged a banner year seeing thousands of visitors. New businesses have started here in Hector in the past few years, rather than declared bankruptcy. Most people I know work two jobs because there is so much available employment and demand for employees! People do not travel to Seneca Lake to see industrialization, gas plumes, or construction. People do not travel to Seneca Lake to hear drills, or heavy machinery, or traffic. People travel to Seneca Lake to get away from it all; to relax lakeside with a glass of wine; to walk The Gorge; to enjoy fine dining in an intimate setting; to watch the sun set over one of the worlds most beautiful landscapes; to take a dip, go for a boat ride, ski and sail; Happy couples even travel to Seneca Lake to get married and to honeymoon because of the NATURAL BEAUTY.

This proposed gas storage facility will threaten an ever growing, recession proof wine and tourism industry, if for no other reason, by strictly, visually, existing and transporting. This proposed gas storage facility will threaten one of the most important agricultural food producing areas in the North East, by risk of technical failure, (which has yet to be accurately assessed.) Clean water is pretty important. Humans can live without food far longer than without water. Plants need clean water to grow. What happens if a salt cavern collapses? We’ve all seen how oil and gas spills “clean up”. What happens if the brine pit leaches into the lake or a farmers land? Why should the New York State Department of Environmental Conservation NOT TRY TO CONSERVE WATER, AGRICULTURE and a successful TOURISM INDUSTRY which thrives on both?! Why should the New York State Department of Environmental Conservation ignore our neighbors in Pennsylvania who are living proof of how damaging this gas drilling, storing and transporting industry really can be?!

YOU CANNOT EAT MONEY, AND YOU CANNOT DRINK OIL.

Considering the obvious threats this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on our region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

I speak for thousands when I say we do not want this gas storage facility to happen to Seneca Lake.

Thank you for considering my concerns and suggestions,

Jesse Beardslee
David,

It was nice to see you and to meet Peter Tuesday in Watkins Glen.

I don't know if you spend much time here and it's a beautiful place any time of year, but in a week or so the leaves turn and it becomes spectacular. An interesting experiment for the senses might be taking a drive down Rt. 414 to Watkins Glen, have lunch at one of the wonderful restaurants, visit a few wineries, then head back north on Rt 14 taking in the sights. The utter lack of anything nice for several miles with the Enterprise (formerly Teppco) LPG Depot on the left and the rusty chain link fence behind which are piles of pipe and other equipment on the US Salt property on the right.

I attached a letter that is a formal request to the DEC to have a second Public Hearing. I explained why we think it is not only fair, but necessary. Please let me know where the DEC stands on this.

Thank you and I hope to hear from you soon.

Best regards to you both,

Joseph M Campbell, DC
September 29, 2011

To: David L Bimber  
Deputy Regional Permit Administrator  
NYS DEC, Division of Environmental Permits  
6274 East Avon-Lima Road  
Avon, NY 14414-9519

From: Joseph M Campbell, DC  
President and Co-Founder  
Gas Free Seneca  
PO Box 333  
Watkins Glen, NY 14891

Re: September 27, 2011 Public Hearing

Dear Mr. Bimber,

I am writing on behalf of the Co-Founders of Gas Free Seneca and the 130 members of the Gas Free Seneca Business Coalition regarding Tuesday’s Public Hearing at the Watkins Glen High School Auditorium.

First, we would like to thank you and all the DEC staff who made the trip to our Town and suffered with us in the auditorium. Apparently the air-conditioning had broken and the school was waiting for repairs.

Our concerns with the Public Hearing are two-fold. At last count, as many as 84 people had signed up to make public comment. By the end of the Hearing at 10:00 pm only about 37 members of the public had an opportunity to speak.

The applicant, Inergy LP, had a question and answer session between the hours of 6-7:00 pm. Mr. William Moler was to have given a project overview at the start of the hearing. What his “overview” consisted of, however, was a set of talking points designed to counter criticisms of the project lasting a good 20 minutes or more. The public never got a chance to hear, from Inergy or anyone else, the details of the project.

The first speaker was an Inergy employee. The second speaker was also an Inergy employee. By our count, some 8 employees of the company spoke in addition to Moler, and that’s not including a couple of Salt plant employees. In all, out of the 4 hours the DEC was there, Inergy and its employees used more than half that time with little to no substantive comment from any of them. We believe that this was done purposely to limit comments critical of the project.

Gas Free Seneca respectfully requests that the DEC schedule a second Public Hearing at the same venue. We would also request that Inergy and its employees be disallowed from speaking at that hearing. We think that they had more than enough time at the hearing on the 27th. A project overview should be given by a disinterested third party to start the Hearing. Of the 800 or so people in attendance, it’s safe to say that at least some of them had no idea what the hearing was to address.

FreeSeneca.com  PO Box 333, Watkins Glen, NY 14891  gasfreeseneca@gmail.com
We would also ask that ground rules be set ahead of time limiting comment to the subject at hand, not allowing opinion, and keeping to a strict time limit of, say, 5 minutes.

Because of the fiasco at the first hearing, we also believe that the period for public comment should be extended. 45 days was too short a period to begin with for the lay public to try to read and digest the dSEiS, a nearly 1,500 page document, and now the opportunity for the public to comment in an open forum has been compromised, we think intentionally.

Please respond in writing as soon as possible to our concerns and this request. I can be reached at this email address or by calling: (607)769-4639 (mobile).

Thank you and I remain,

Respectfully yours,

Joseph M Campbell, DC
President and Co-Founder
Gas Free Seneca

Cc: Peter Briggs-Division of Mineral Resources, Richard J. Lippes and Associates, Gas Free Seneca, Commissioner Martens, ALJ Nicholas Garlick, Regional Permit Administrator Scott Shelly
From: Janette Chauncey <janettechauncey@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 9/30/2011 12:13 PM
Subject: The Proposed LP Storage in the Abandoned Salt Mines - Letter to the DEC

September 30, 2011

Dear Mr. Bimber,

I am writing to state legislators, environmental agencies, and other decision-makers with an urgent plea to, at the very least, MORE closely examine what many of us believe will become an abomination if not stopped NOW. There is still time (but I am afraid not much) to preserve the beauty and health of the Finger Lakes, perhaps even the entire state and country. I beg you to project forward and visualize the consequences of brine pond spills, gas leaks, explosions, air and sound pollution, risking serious and even fatal injury to those who live here. Forget about the corporate moguls who will reap great financial rewards with their plundering of our land. How many houses does a person need!? How many yachts? How many corporate jets? These people have no conscience, no ethics, no heart, no soul. They gobble up the earth for their own personal gain with no regard or respect for future generations, even their friends and families. It's wrong and it can't be justified. The "sickness" is rampant everywhere to destroy the clean air and water we ALL need to survive. That is why we have organizations like the DEC, to help PREVENT this destruction from continuing.

The Proposed LP Storage in the Abandoned Salt Mines
A friend and I attended the meeting in Watkins Glen this past Tuesday (September 27) relating to the proposal by the Missouri-based corporation, Inergy, to use the salt mines in the Watkins Glen area to expand it's operations. If this company is allowed to proceed with their proposal, it does more than allow just one "small operation" to spoil one small area of the Finger Lakes. It opens the doors to more industrialization and corresponding devastation by similar companies. And it would eventually affect every citizen living in this state! Is it not bad enough that NYS is home to the largest dumpsite in the Northeast, one that is getting BIGGER?! But the clay mines are another topic, one which should ALSO cause everyone living here to lose sleep!

To continue, please take the time to review the articles below.

http://www.preservethefingerlakes.com/2011.03.01_arch.html

Hearing this greedy corporation blatantly lie to us and gloss over the health risks to the area, as well as the environmental (and economic) damage that would affect the entire state, similar to what happened in states such as Colorado and New Mexico, made the hairs on my neck stand on end. The attitude of the officers seemed to be quite flippant. "Oh, if the brine pool over-flowed into the lake it would just be a little drop in the bucket." Are they kidding?! I can just picture hundreds of dead fish washing up on shore, victims of this little "drop".

There were no elected representatives in attendance! Why was that I wonder?

This is a HUGE concern. It is another example of mankind corrupting the planet in order for a FEW to gain additional wealth, blood money. What's sickening is having to listen to the propaganda that this is for the good of the people because it "could" lower gas prices to the area residents. However, no guarantee was made to actually do so! We all know where the additional profits would go, don't you agree? And this very same company was sued for price gouging not long ago. And even if they DID make such a
guarantee to lower prices, would YOU believe them? Furthermore, would YOU sacrifice the health and well-being of your children and grandchildren based on their sloppy (and incomplete) research?!!!

"In 40 years there hasn't been an accident" was one comment heard. Is that even true? Are all accidents revealed to the public? In my mind that's a lame argument anyway. For one, it means a catastrophe could be DUE TO HAPPEN SOON, and two, conditions change. Weather patterns change. WE JUST DON'T KNOW WHAT WE ARE MESSING WITH SOMETIMES!

We were told the company will be adding 8-10 jobs (WOW!) for this expansion. But how many jobs would be LOST because the wineries can't grow healthy grapes and the smell of diesel trucks and sounds of drilling and sight of industrialization ruin the area for those who live here and depend upon the tourism trade to do so! And these folks have to close their doors. Do we really want Watkins Glen, or any other city for that matter, to look like Newark, NJ? I lived next to Newark for 20 years. I moved back here because of the traffic and the smells and the HIGH RISK OF CANCER in that area.

In attendance were scientists, geologists, biologists who shared some very troubling statistics about the faults in this area. These have not been adequately studied. In fact, one speaker, Karen Edelstein, provided maps of faults in the very area proposed for development! These have been submitted to the DEC. Please be certain to look at this information. It is very scary to me to think what might happen. A catastrophe is not a remote possibility. Have we not learned that mother nature has a way of humbling us all without any warning?

Our earth is fragile, yet we continue to abuse it. The scientific community has WARNED US that time is running out before the damage is irreversible. Man has not learned to control unintended consequences. I don't need to cite examples of this. I am certain you are aware of recent catastrophes that cost many lives and billions of dollars due to ignorance and/or negligence. The president of Inergy himself would not guarantee our safety should there be a natural disaster (flood, for example) or terrorist attack, or even a simple human error. This is too big NOT to have guarantees.

I have to ask, how is it that the most beautiful area in the northeast, an area that supports a huge tourism trade, an area whose waters supply thousands of people and animals with clean drinking water, that if poisoned will contaminate the largest fresh watershed in the world, was targeted for underground gas storage, hydrofracking, and the largest dumpsite in the northeast?! Have you ever driven by Seneca Meadows and smelled the garbage? It is nauseating. Who knows what toxins and evils are buried in that mess and what deadly chemicals are leaching into our waters! Water is one of our most precious resources! Imagine a world without clean water.

The proposed propane storage would affect us all in one way or another, not just the residents on Seneca Lake. The proposed operation is closely linked with hydrofracking, which has been PROVEN to cause all kinds of death and destruction across the nation. I cannot believe you would support this raping of the Finger Lakes, or our planet for that matter. I urge you to step up to the plate and listen to the people, to your neighbors, to the children who would have to live with pollution in an industrialized Finger Lakes. Listen to your OWN conscience. There are those who just don't understand risks and there are those who just don't care. I hope you are not the latter.

If nothing else, we need to do further studies before letting this company jeopardize innocent lives and ruin the wine and tourism trade. There is just too much at risk NOT to do this. Inergy should be made to pay for a third-party independent company to investigate ALL possible ramifications. Inergy should then guarantee preventative measures and remedies and be held PERSONALLY responsible should those measures fail. The officers of the company should be made to personally stand behind their word. If they can't do this, I suggest it's a pretty good indication they don't believe their own "crap"!! Again, I ask why has New York State been targeted for ruination? Who will want to live here?

Here's what's really troubling. At the meeting in Watkins Glen MANY OF US got a sense this is a "done deal" and the public was invited to present objections (or support) ONLY as a formality, that the DEC has
no intention of turning the company down. It is an outrage if this is true. The current attitude seems to be, if corporations don’t want to follow established community guidelines, then find a way to change the guidelines... OR just ignore them. The corporations and the bankers are in charge. They do what they want. And they do not go to jail or pay for breaking the laws! WE PAY FOR THEIR CRIMES. WE PAY TO CLEAN UP THE MESS THEY LEAVE BEHIND. AND THEY ARE LAUGHING ALL THE WAY TO THE BANK! Business as usual.

Hopefully, this country will return to the principles and laws upon which it was founded, as set forth in the Constitution, without violence, BEFORE the "pitchfork crowd" takes over! It may seem futile to continue to fight these wrongdoers. Yet many of us keep trying. That's what the founding fathers did. If we don't do that, all that they lived (and died) for was in vain.

I am but one small voice, yet I still hope my plea won't go unheard and that enough small voices will become a roar, and that roar will be heard far away, even by those in Washington. This is really a global issue. We MUST stop the ruination of our planet. We have nowhere else to go.

Thank you for your time and consideration.

Respectfully,
Janette Chauncey
9205 Route 96, Interlaken, NY 14847
October 1, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

As a member of the Schuyler County community, I strongly and respectfully urge you not to ignore the well documented concerns of the local population regarding the expansion of this facility and the unwelcome increase in industrial activity that will occur as a result of the same. As the owner of 5% of the Watkins Glen commercial district buildings on N. Franklin Street, as well as owning other property in Schuyler County, I hereby request to have a Qualitative and Quantitative Risk Analysis (QRA) completed and submitted to the DEC and the people of Schuyler County for review before any increase in capacity is allowed at the Reading facility.

I am passionately in support of Schuyler County’s economic growth. The extraordinary growth of the tourism industry is why I have invested in the community and the primary catalyst for my future Schuyler County investment plans. However, it is my position, as well as the position of over 120 local businesses, that Inergy’s planned expansion of industrial activity will have a profound negative effect on the Finger Lakes tourism industry, the Village of Watkins Glen, and thousands of residents in the surrounding communities.

An increase of tanker truck traffic through Watkins Glen, especially during nighttime hours, will make Franklin Street a noisier and less appealing location for my residential tenants. Inergy’s estimate of four trucks an hour might not sound like much, but between 2am and 3am, four additional tanker trucks an hour below their bedroom windows will be unacceptable.
for my tenants. And this is only what is being promised by Inergy, their own recent history shows that they will continue to expand their operation's volume until they are legally forced to limit the same or make financial reparations. This will force lower rents, high window upgrade costs, and will result in lower quality tenant living in the community. My retail tenants will also suffer from extra daytime truck traffic as Franklin Street will become a less appealing environment for walking and window shopping. Additionally, the wear and tear on our roads could far exceed the small amount of money that the village and county may receive annually from property tax or the proposed PILOT payment.

Even in the face of fierce local opposition, Inergy has shown no interest in making any contribution to the our community...only gestures to brush aside the concerns of residents, business owners, scientists, and Ivy League educators. 8 Years ago LAX airport paid to have every nearby residential window replaced with double paned soundproof windows as their traffic increases caused a decrease in quality of life for local residents. Inergy's declared $40 million capital expense is to build their own cash machine, nothing for Schuyler County. I am looking at being forced to pay for new windows and new facade treatments on each of my buildings that face Franklin Street. I will also expect to see my property values decrease, my residential and commercial rents decrease, and the quality of my tenants decline as well. All are my direct uncompensated negative economic impacts of this project.

The ten Inergy jobs that may be created by this expansion might appear to compete favorably with some lower wage winery jobs, but can not compare with the economic impact created by a new local business. Business owners who live and work in our community contribute to, and have interest in, the economic growth and planning of Schuyler County on many fronts including: local construction and craftsmen, plumbing, general maintenance, waste management, landscaping, patronage of other local businesses, and will embrace and foster a sense of community.

The salt plant has been on the shores of Reading for longer than most of us have been around, so it is therefore an accepted blemish on the local landscape. However an increase of industrial activity, truck and rail traffic,
and noise between April and November will abort our county's economic tourism explosion before the benefits are fully realized by the people and businesses who have worked so hard to make it happen.

The growth of this facility including every truck that use our roads and every train that awakens our residents must be strictly limited to protect our way of life and local industries. We must have strict limits on the scope of this project and the community deserves to be acknowledged as we ask to have a QRA completed for review.

Thank you for taking the time to read my comments on this topic.

Sincerely yours,

Dave Terman
Terman Road
Hector, NY 14841
Mailing address:
P.O. Box 106
Hector, NY 14841
310-592-5530
Recuts@gmail.com
We "strongly" support the L.P. Gas storage facility in Watkins Glen. It will be a great asset for our area. "Wineeries" are not the answer to our economy.

Tourist will still "visit". We need, if not lower, at least stabilize our heating bills. Help our economy in this area. I worked for years in the L.P. Gas industry. It is safe and regulated.

Please grant "Energy" the permit needed to complete this facility.

Tim Kinsley, Arlene Kinsley
66 Seneca St
Dundee, N.Y. 14837

Ph: 607-243-9135
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

I am a resident of Watkins Glen in the Town of Reading in New York. I have listened to presentations by both Inergy, Inc and opponents to the proposed storage facility. I have many concerns relating to the facility as outlined here:

- The increased truck and rail movement through the area. There is only one thoroughfare through Watkins Glen and it has only 2 lanes surrounded by parked cars. It is a small business and residential area and not conducive to heavy truck traffic. Residents shop and children walk to school along this street. I am concerned for public safety.
- Emergency fire and ambulance services in Watkins Glen and all the surrounding communities are provided by volunteers only. While these volunteers do an excellent job of protecting our rural community, one has to wonder if they are prepared to deal with a potential industrial accident on the scale that could occur with increased storage of flammable materials and increased transportation of such materials through the community. How the development of this storage project would effect the County’s emergency plan is unknown.
- This region of the Finger Lakes has invested a great deal in the promotion of tourism over the last 30 years. I personally do not believe the two industries are compatible. I moved from a large city to Schuyler County to get away from this type of industry. I certainly will not stay in an area where it exists but will seek another locale that provides the serenity currently found here. I am probably not the only resident who feels this way. I foresee a drastic change to the tranquil beauty of the area. One wonders if it makes sense to make such a large investment in tourism, only to have it countered by the interests of a large out-of-state corporation. I really cannot see Lake Como or Lake Tahoe communities even considering such development. Why would Seneca Lake be any different? Is economic development worth this cost? I think not.
- There are many scientists who suggest that the plans provided by Inergy, Inc are not comprehensive enough and do not consider potential drainage problems, fault lines and other negative geological conditions. I do not have scientific expertise so I rely on others to reassure me that all geological conditions are safe and adequate for this project. I am not reassured.
- New York State is facing a fiscal crisis that does not appear to be going away any time soon. Staff in all public service departments has been reduced. I question the
Department of Environmental Conservation's ability to adequately monitor this project now and in the future.

With these concerns, I believe it is imperative that an independent Qualitative and Quantitative Risk Analysis (QRA) be conducted so as to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis and it should be paid for by Inergy.

Thank you for considering my concerns and suggestion,

Elizabeth M. Lisk

This is a copy of a previously submitted e-mail from senecaview@gmail.com
In Inergy's statement to the SEC, they stated that this would be a hub for Natural Gas in the Northeast. At a meeting in Watkins Glen they lied to us and stated that this was merely to help their propane distribution network.

Even if this community could trust Inergy as a business partner, the idea of putting a massive gas storage facility right next to Cayuga Lake, is a monstrously bad idea. When (not if) their brine holding pond overflows, our lake and the tourism, vineyards and agriculture will be destroyed. When (not if) an accident occurs which damages the integrity of this massive underground storage facility, our lives will be at risk.

Our community is dead-set against this.

Regards,

Josh Harben
Hector, NY
Dear Mr. Bimber,

Thank you so much for doing your best to sort through the real issues related to the LPG Gas Storage question near Watkins Glen. While there are many obvious negatives, there are few positives.

I am a professional NYS licensed massage therapist. I would like to address some human concerns. The stress level that has accompanied the threat of increased diesel and train traffic, the fear of human error and potential chemical calamity is palpable. If I am careful in how I focus my marketing I could benefit from the ill health that this kind of stress and fear can create.

One of my clients is already coping with the severe health damaging effects of chemical exposure from a previous employment situation. Frankly, I fear for his life. Diesel truck fumes lay him out on the couch for days sometimes.

Although I am pro-economic development and jobs are important, I cannot support a business that increases truck traffic in a small tourist town that already has traffic backed up frequently.

Another issue I am concerned about is that there is an increase in sexually transmitted diseases in areas where the gas industry has brought in "jobs." I am personally not looking for relations and my daughter is only 13, so I can hope that she can be guided to stay well away from anyone involved with the gas industry. However, it is a concern. There are numerous links online if you are inclined to research this issue.

Please protect us.

Sincerely,

JoAnn Kingsley, LMT
Watkins Glen Massage
109 W. 4th Street
Watkins Glen, NY 14891
Mr David L Bimber  
Deputy Regional Permit Administrator  
NYS DEC Div of Environmental Permits  
6274 East Avon-Lima Road  
Avon, NY 14414-9519

Gentlemen:

I am a resident of Seneca Lake who is very concerned about the proposed propane storage facility.

Inergy, LP is trying to open a propane storage facility on Seneca Lake with a 14 acre brine pond on the side of a steep slope along the west side of the lake. If they are allowed to open, it will change our way of life forever.

I want you to consider these questions in making your decision to approve this facility.

1. Will this facility be able to withstand an earthquake (one was felt here this summer)?
2. Who is responsible to protect the community from a spill, fire or explosion? We are a rural area and have only volunteer fireman who are not trained to deal with this situation.
3. Who will pay the cost of road repair and maintenance? Our state and towns are already on tight budgets and don’t have the funds to cover this.
4. Who would pay the cost of clean up if a propane tank exploded which happened in Lincoln, Ca this summer with an estimated clean up cost of $500,000.
5. Who would pay if the brine pond leaked into Seneca Lake? The Village of Watkins Glen’s water plant is only a few miles away. Is this company prepared to compensate for the hundreds of private wells on the lake?
6. Is this company healthy enough to support this endeavor? See the enclosed article describing the drastic drop in the company’s value.
7. Are the railroad trestles that stretch over huge gorges strong enough to
handle the increased traffic?

Please reconsider approval for this facility. Once our water is polluted, it cannot be fixed. Our future wars will be fought over clean fresh water, not oil or fuel. It is the most basic of our resources. The eight jobs created are worth nothing when balanced against the risk of losing our tourists.

Sincerely yours,

Susan F Wolf

cc: Reading Town Council
Village of Watkins Glen
This morning, Inergy L.P. (NRGY) filed its initial IPO registration form S-1 for its midstream subsidiary, Inergy Midstream, L.P. (will trade with ticker NRGM). The filing is for up to $300mm in gross proceeds. Morgan Stanley and Barclays Capital are joint bookrunners and the only banks listed so far on the registration statement (see S-1 here).

NRGM owns 4 natural gas storage facilities with a combined working gas storage capacity of 41 bcf, 1 NGL storage facility with 1.5 million barrels of capacity, and natural gas pipelines that will have 875 MMcfd of transportation capacity upon completion of two pipeline projects.

Inergy, L.P. Operations Map

NRGM projects that 66% of revenues will come from firm storage services, 26% will come from transportation services, and the rest from hub services. NRGM expects to have $127.9 million in EBITDA in the next 12 months and $123.5 million in distributable cash flow. NRGM projects to spend $118 million on planned and contracted expansion projects to achieve its projections. NRGM will have a clear balance sheet to start with, only $80 million of debt, or 0.6x debt to EBITDA, compared with 4.9x debt to EBITDA at NRGY currently.

NRGY's EBITDA for the last 12 months was $366mm, and as of today's close, NRGY had an enterprise value of $5.1 billion, which means NRGY trades at 13.9x EBITDA. If NRGM trades at the same valuation, NRGM would have a value of approximately $1.8 billion. We'll see in the next few rounds of revised S-1's what the bankers think NRGM is worth.
The comparable situation is to PAA (PNG), which took its natural gas storage business public as PNG in 2010. PNG now carries a 24x LTM enterprise value to EBITDA multiple (18.6x consensus 2011E EBITDA multiple) as it ramps up growth over the next few years, very similar to NRGY’s storage expansion projects. If NRGM gets that kind of multiple as a standalone business, this IPO would be a home run for NRGY.

This IPO is an effort to inject some life into the company, which has struggled of late with both its propane and its midstream businesses. The IPO will help NRGY de-lever its business without losing control of the storage assets and associated upside. NRGY will retain the general partner and incentive distribution rights at NRGM, which will pay NRGY an increasing distribution when NRGM increases its distribution per unit.

NRGY has now gone 4 straight quarters without growing its distribution after 35 straight quarters of growing its distribution (every single quarter since its 2001 IPO). NRGY raised its distribution at an annual rate of 10.3% until the second quarter of 2010, and since then 0%. Declining propane fundamentals and the challenge of digesting its merger with NRGP (its public GP) led to the growth stall. The market has not been kind to NRGY as a result. As shown below, NRGY has lost 1/3rd of its market value since the end of 2010, well below its propane peers like Suburban Propane Partners (SPH) and Amerigas (APU). NRGY now sports a yield of 10.7%.

![NRGY Price History vs APV vs SPH](https://seekingalpha.com/article/289853-whether-the-inergy-midstream-ipo-will-turn-things-around"

Will this IPO be the catalyst that turns things around? I'm not sure, but I like the drastic move and the effort management is putting into changing the way the market perceives the company. It may be too little too late, though, as they've dug a pretty big whole with several big moves that haven't worked out in the past few years.

Disclaimer: The information in this article is not meant to be financial advice, we are not your financial advisor and I am posting my comments for informational purposes only.

Disclosure: I have no positions in any stocks mentioned, and no plans to initiate any positions within the next 72 hours.