Dear Sir,

Please do not approve of the Liquified Petroleum Gas Facility near Seneca Lake in the town of Kendig. The Earth's weather systems are changing rapidly right now and any natural disaster could put acid mist poisoned water into the lake.

We need to protect our fresh water eco-systems. Please do not approve this!!

Protect our water supply!

Thank you,

Victoria Hansonussen

[Stamp: RECEIVED
NOV 14 2011
DEP-REGION 8]
Carol and Hiram Segarra  
450 East 4th Street  
Brooklyn, NY 11218

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 visitor and lover of the Finger Lakes region, I am opposed to the plan to turn the area surrounding the southwestern end of Seneca Lake into a Liquid Petroleum Gas Storage and Transportation Facility, as proposed by Inergy. Such a facility will threaten the health of the drinking water. It will be ugly and noisy. It will bring heavy truck and rail traffic that is dangerous and a nuisance, and overwhelming on the small highway and rail infrastructure. It will threaten the health of the lake as a habitat and as a place of recreation. It will bring risk of environmental disaster.

All of these threats have the potential to destroy all of the things that bring me to Seneca Lake – the landscape, both natural and agricultural, the lake recreation, the wineries, the peacefulness, the bucolic lifestyle and the community itself. How sad that would be, for me as a tourist and for all the people who make a life there.

I ask that you please require Inergy to pay for an independent quantitative risk assessment on their proposed LPG Storage and Transportation Facility before considering granting them the necessary permits.

Thank you for your consideration.

Best regards,

Carol Segarra
Dave L. Bimber  
Deputy Regional Permit Administrator  
Division of Environmental Permits  
New York State Department of Environmental Conservation (Region 8)  
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,

I am a visitor to The Finger Lakes Region. I have not read the Draft Environmental Impact Statement issued to The New York State Department of Environmental Conservation by Inergy Corporation. I do, however, understand that the plan to store liquid petroleum gas in the salt caverns below Seneca Lake sounds very risky.

The idea alone, of any increased traffic in Watkins Glen, New York makes me very hesitant to consider traveling through that town – there's really entirely too much truck traffic as it is. Not to mention the dangerous cargo that could be moved if this plan were to take place. Even if this proposed hub focuses on rail car transportation, the rail road tracks go straight through Watkins Glen as well.

From what I understand gas storage within salt caverns is very dangerous, and does not have a good track record. It will also require a brine pit, and possibly a gas plume. These toxic signs of a heavily industrialized area are not why I visit The Finger Lakes Region. I keep seeing the “No LPG” yard signs, and it is made obvious that many of the residents surrounding Seneca Lake do not want this project to continue. I understand there are over 4,000 signatures on petitions against this project, and over 150 businesses in a coalition opposing it as well. (I would assume that those are considered as public comments?) I visit this area to enjoy the wine, the natural beauty, and the people. I will unfortunately have to reconsider if it is further industrialized by this specific project. I can vacation wherever I want, I picked Seneca Lake.

If this proposed gas storage facility is not done safely I may not return to spend my hard earned money in these wonderful wineries. If there is any risk of this project hurting the area in any way, I must say Seneca Lake is special enough to reconsider the entire idea. I do not want to see this landscape change at all. I do not want to see large corporation, gas company industrialization happen here. It seems this project is ill suited to this area and should be done else where. I understand there is a similar facility in Savona, why not there? Mr. Bimber, please revoke the permit for this project in The Finger Lakes.

I visit Seneca Lake for WINE NOT BRINE.

Thank you for considering my comments,
Sincerely,

[Signature]

[Address]

[Postmark: Nov 14 2011]
David L. Bimber
Deputy Regional Permit Administrator, NYSDEC
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,

I am writing to express my reservations about the proposed LPG storage facility on the shores of Seneca Lake and to urge the DEC to reject this proposal as inappropriate from environmental standpoints as well as from economic and cultural standpoints.

I am a homeowner in Tompkins County and have lived in the area for 25 years. The scenic attractions near Seneca Lake—the parks in Watkins Glen, the Farm Sanctuary, and the Finger Lakes Wine Trail—have been favorite destinations for family outings and for entertaining out-of-town visitors for decades. As you know, the local economy in tourism and specialty agriculture—organic farming and wineries—is strong and growing, even in a downward-turning economy. The unparalleled beauty of the Finger Lakes Region is a unique attraction and an irreplaceable resource.

There is no question that the industrial installation and transportation hub as proposed by Inergy Midstream LLC will deal a crushing blow to tourism in the area and have strong adverse effects on a wide array of tourism-related businesses not only in Watkins Glen but in the wider Finger Lakes Region—the unsightly development and increased truck and rail traffic are enough to do that. But the open questions about the safety of this proposal and real possibilities for environmental disaster—including contamination of Seneca Lake from an overflowing brine pond or underground leaching of toxic chemicals, possibilities that don’t seem so far-fetched after the unprecedented flooding and increased seismic activity we’ve seen in the past year—put the proposed development beyond reasonable consideration.

It is irresponsible to allow industrial development on the shores of Seneca Lake that not only jeopardizes the water quality of Seneca Lake but also promises to destroy a strong local community. I urge you to protect this unique natural resource and the cultural and economic assets that it supports by rejecting this proposal.

Sincerely,

Susan Kyser
Dear Mr. Bimber,

I have many concerns about the proposal for storage of LPG in salt mines in Reading, NY. I believe the DEC Environmental Impact Statement (EIS) does not fully cover the environmental, economic, and cultural impacts of this project on Seneca Lake and Schuyler County, or on the neighboring counties.

In my opinion, the following key issues are not fully addressed:

- **Clean water.**
  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?

  There is evidence (Halfman, Finger Lakes Institute; Wing, et al.) of an elevated salt content in Seneca Lake from permeability into the lake from salt caverns. Are there guarantees that LPG and butane will not seep into the lake? Will the proposed hillside brine pond spill or leak into the lake and other local sources of 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 brine leakage, how long would it take for the brine to contaminate the water table? The EIS does not answer these questions.

  What would be the impact of the brine pond on our populations of migratory and breeding birds, such as loons and other waterfowl, eagles, and other raptors? What about the ecological health of nearby wetlands? The EIS claim that since our wetlands are small, no impact or mitigation measures are required is not valid.

- **Harm to the existing economy.**
  The local tourist industry is vital and growing. It provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world. The local vineyards and wineries are the brightest spot in our local economy. Their viability depends on plentiful, clean water and an attractive, inviting environment.

  The unattractive and noisy LPG facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen. 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. This will put our crucial tourist industry jobs in jeopardy, in exchange for a few industrial jobs.
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? In fact, propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Already some existing businesses have postponed plans to develop or are selling property in anticipation of being 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.

- **Other safety and economic issues.**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Will local taxpayers be expected to pay for this? What guarantees are there that safety will not be compromised? How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Are our small local fire departments expected to deal with possible catastrophic failures at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe?

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 the proposed 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?

- **Financial losses to local citizens.**

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? Already homeowners are selling and delaying remodeling plans. 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, with a negative impact on the region’s property tax base.

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?

Are there data behind Inergy’s economic claim that home heating costs will go down for upstate New Yorkers? What are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a critical study of Inergy’s economic claims.

- The validity of Inergy’s statements.
  Inergy does not have experience building a facility of this type and size from the ground up. Inergy largely relies on the 1992 GEIS for information in their proposal, but that document dealt with hydraulic drilling of vertical wells, not the storage of LPG in salt mines.

  There is a disparity between what Inergy has stated in its draft EIS and what they are telling investors. In their EIS, 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. 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.

  Furthermore, I am concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility. 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.

  I urge an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risks and impacts 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 questions,

Richard Nowogrodzki
32 Strowbridge Street
Trumansburg NY 14886
From: Owen & Patricia Marjama  
37 Buttonwood Lane  
Dundee, N.Y. 14837  
Nov. 9, 2011

To: David J. Bimber

Re: Proposed FingerLakesLiquefied Petroleum Gas Underground Storage Facility in Readig, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

We are very aware of the risks & potential damage that the "Underground Gas Storage" will cause to the Seneca Lake area. I am a retired attorney & my wife is a retired teacher.

We built our "dream" home overlooking Seneca Lake in Dundee, twenty years ago. Several years ago we bought a house adjacent to our property as a tourist rental investment and have been very successful in renting to people from all over the United States & Europe.
They have come to experience the ambiance of the wine country.

We are committed to this spectacular area and do not want it to be put at risk!

Underground gas storage and all that it entails will ruin everything that we, our children and grandchildren have worked so hard for.

Sincerely,

Omer Marjama
Patricia Marjama
5731 Adams Leidenfrost Road  
Hector, New York 14841  
September 6, 2011

NYS Department of Environmental Conservation  
625 Broadway  
Albany, New York 12233

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
Whether The Inergy Midstream IPO Will Turn Things Around For The Company

by: Hinds Howard

August 25, 2011 | about: NRGY, includes: APU, PNG, SPH

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 MMcf/d 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%.

(Click to enlarge)

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.
N.Y.S. Dept. of Environmental Conservation

The proposed liquid petroleum and gas storage and transfer facility in Reading, NY is an intolerable idea because:

It would change a farming/winery area into a heavy trucking - heavy industrial area. Tourism would be ruined. Who would live in, farm in, or visit an area that could blow up and/or leak gas into Seneca Lake? Property values will fall greatly. Heavy, constant trucking and railroad usage will cause noise and air pollution. The route between Watkins Glen, NY and Horseheads, NY is narrow and is in a valley. Trucking gas through this area will cause air pollution that cannot rise out of this valley.

Why should longtime residents be punished for the benefits of a few?

Why put beautiful Seneca Lake?
all the wineries, all the farms, all the longtime residents in danger? Why take a world famous, pristine area and just trash it? Does the positive economic past and long-time respect of and appreciation for the Finger Lakes Region count for nothing? It is shameful that anyone is considering this gas storage and transfer fiasco!

John and Annel Quashnock
1141 East Bluff Dr.
Keuka Park, NY 14478
Dear Sir,

I am writing in regards to the planned LPG facility on Seneca Lake. As a resident and homeowner on the lake I have concerns about establishing this facility on such an environmentally sensitive body of water.

I would like to request that the DEC initiate an evaluation by a qualified third-party entity that can assess this project for safety and environmental factors.

Sincerely,

Sylvia Dolich

RECEIVED
NOV 14 2011
DEP-REGION 8
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 visitor and lover of the Finger Lakes region, I am opposed to the plan to turn the area surrounding the southwestern end of Seneca Lake into a Liquid Petroleum Gas Storage and Transportation Facility, as proposed by Inergy. Such a facility will threaten the health of the drinking water. It will be ugly and noisy. It will bring heavy truck and rail traffic that is dangerous and a nuisance, and overwhelming on the small highway and rail infrastructure. It will threaten the health of the lake as a habitat and as a place of recreation. It will bring risk of environmental disaster.

All of these threats have the potential to destroy all of the things that bring me to Seneca Lake – the landscape, both natural and agricultural, the lake recreation, the wineries, the peacefulness, the bucolic lifestyle and the community itself. How sad that would be, for me as a tourist and for all the people who make a life there.

I ask that you please require Inergy to pay for an independent quantitative risk assessment on their proposed LPG Storage and Transportation Facility before considering granting them the necessary permits.

Thank you for your consideration.

Best regards,

Kevin J. Culver
From: Timothy Dunlap  
5376 Peach Orchard Road  
Hector, N.Y. 14841

To: David L. Bimber  
NYS Department of Environmental Conservation

RE: Facility ID: 8-4432-06085

Sir... I sit & write you on this Saturday morning  
on the eastern shore of Seneca Lake in the hope  
that you will take to heart all of the objections  
that you have heard, & the objections you have seen  
over the course of your public hearings concerning  
the proposed LPG storage facility in Reading.  

The populace of our area should not be  
subjected to the noise, truck traffic, rail traffic,  
and the general 'Storm und Drang' of a major  
heavy industry such as this one.  

We, the people, individually, do not have the  
wherewithal to operate a major marketing ploy;  
however, collectively, we have attempted to show  
you, the Department of Environmental Conservation,  
the intensity of our feelings and thoughts.  

I implore you to not allow Seneca Lake to  
become the hub of the universe for the  
gas industry.

Thank you for your consideration.

Sincerely, Tim Dunlap
November 10, 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,

On behalf of members of the Finger Lakes Group of the Atlantic Chapter of the Sierra Club, I appreciate the opportunity to offer comments concerning the proposal by Finger Lakes LPG Storage Facility LLC to construct an underground storage facility for liquid propane and butane, as well as a rail and truck loading and off-loading site, in abandoned salt caverns owned by U.S. Salt outside of Watkins Glen, New York.

After reviewing the Draft Supplemental Environmental Impact Statement prepared by the applicant for storage of LPG in salt mines members of the Finger Lakes Group’s Executive Committee feel that many questions remain concerning the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. I wish to briefly highlight some of our groups most pressing concerns.

The applicant 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? Doesn’t the applicant realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Apparently, though purely anecdotal the group has heard that some businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the LPG 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. Whether this proposed facility is sufficient to drive businesses away, becomes the operative question.

Economic and safety issues:

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage structures, 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? In fact the applicant provided only a cursory inventory of emergency responder capabilities in the immediate 10 square mile vicinity of the facility, so it is not clear whether the applicant is even fully aware of what is or is not available locally.

What are the risks of building this facility on a sloped 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? Clearly, the stronger the wind the greater the risk. 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 NYSEG proposed compressed air storage facility (CAES)? 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? And will the frequent alternating pressure differentials in the CAES facility increase the potential for destabilization of the salt caverns.

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 applicant’s proposal, includ-
ing pipeline, impact Grade A farmland? Although the applicant insists most of the truck traffic will be occurring during the winter months, publications from the Union of Concerned Scientists indicate that, with Climate Change and increasing emissions, ozone levels are rising to dangerous levels even in winter months.

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? According to the DSEIS, the applicant assumes no responsibility for emergency preparedness of truck and rail haulers.

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?

There is no mention in the DSEIS of consideration for mitigating the impacts of accumulating levels of NORM onsite in the pipelines and equipment. According to The Guide to Naturally Occurring Radioactive Materials (NORM), published by Canadian Association of Petroleum Producers CAPP in 2000 and reviewed in 2003 (see endorsed), "1.3 Transport and Delivery of Propane and LPG: Propane transport equipment may be contaminated with NORM. This includes pipelines, rail cars and truck tanks. Even if the production site does not concentrate significant amounts of radon, loading contaminated transport tanks that vent into the facility may contaminate the loading facilities." Apparently radon is more soluble in liquid propane and thus concentrates there. It would therefore behoove the applicant to recognize this and take precautions for its employees, as well as its sub-contractors.

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? The Town of Reading has no zoning and, when asked, the Town Assessor admits that the property owners immediately adjacent to the facility will see property values decline.

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 even random small sounds reverberates across and around the entire lake valley?

The brine pond is a huge concern. Though, according to the DSEIS, the brine pond is contained within a double layer, leak detecting liner, there is no manufacturer listed for the materials used in the liner's construction, nor is there a projected life-expectancy for the liner. What provisions are in place for liner replacement procedures. On top of the aesthetic damage to the 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 with compromised 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.

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. The database of historical archeological sites kept by NYS
is woefully anemic, so that it is hardly adequate to rely on available archeological records.

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

As a matter of public record, Inergy, the parent company of Finger Lakes LPG Storage LLC and owner of U.S. Salt, 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.

**The next logical steps:**

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 the applicant. If the project is worth the risk, the company should have nothing to fear from a QRA.

Secondly, a thorough and independent geologic and seismic study of the region should be conducted to determine the soundness and suitability of the strata in question for this and future ventures. **AND** this study should be fully disclosed, not withheld as proprietary information.

Thank you for considering our concerns and suggestions.

On Behalf of the Executive Committee of The Finger Lakes Group of the Atlantic Chapter of the Sierra Club,

[Signature]

Annie Koreman
Vice-Chairman
Guide

Naturally Occurring Radioactive Material (NORM)

June 2000
The Canadian Association of Petroleum Producers (CAPP) represents 150
companies that explore for, develop and produce natural gas, natural gas liquids,
crude oil, synthetic crude oil, bitumen and elemental sulphur throughout Canada.
CAPP member companies produce approximately 97 per cent of Canada's natural
gas and crude oil. CAPP also has 120 associate members who provide a wide
range of services that support the upstream crude oil and natural gas industry.
Together, these members and associate members are an important part of a $52-
billion-a-year national industry that affects the livelihoods of more than half a
million Canadians.

Disclaimer

This publication was prepared by the Canadian Association of Petroleum
Producers (CAPP). While it is believed that the information contained herein is
reliable under the conditions and subject to the limitations set out, does not
guarantee its accuracy. The use of this report or any information contained will
be at the user's sole risk, regardless of any fault or negligence of CAPP.
Overview

This publication defines NORM, briefly outlines how it can occur in oilfield production, gas processing, and in the delivery and transport of propane. It further discusses health hazards and how they can be minimized through monitoring, safe work guidelines, and handling of contaminated wasters. Includes brief list of contacts and a short bibliography.
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1 Where is NORM found?

NORM is found throughout the natural environment, in man-made materials such as building materials and fertilizer and in the following crude oil and natural gas operations:

1.1 Oil and Gas Production

NORM originating in geological oil and gas formations is usually brought to the surface in produced water. As the water approaches the surface, temperature changes cause radioactive elements to precipitate. Resulting scales and sludge may collect in water separation systems. Radium is usually found in this type of NORM contamination.

1.2 Gas Processing

Radon gas brought to the surface will enter the gas production stream. As it decays, thin radioactive lead films may form on the inner surfaces of gas processing equipment. In sales gas, the radon concentrations are identical in both the inlet and outlet gas and are generally low. It has been found that the propane and LPG production process generally concentrates radon and this is where the NORM hazard potential may be the greatest.

1.3 Transport and Delivery of Propane and LPG

Propane transport equipment may be contaminated with NORM. This includes pipelines, rail cars and truck tanks. Even if the production site does not concentrate significant amounts of radon, loading contaminated transport tanks that vent into the facility may contaminate the loading facilities.

NORM is not usually present in refining operations as oil production removes NORM contaminated water before delivery to the refinery. Propane produced at refineries is usually from NORM-free crude oil so the hazard from NORM is very slight.
2 Health Hazards of NORM

Radium, radon, and their decay products are radioactive elements of concern in petroleum production and gas processing. Human exposure may occur when contaminated dusts and sludge are inhaled or ingested (internal exposure) or when gamma radiation from surrounding equipment strikes the body (external exposure). The amount of gamma radiation able to penetrate processing equipment is generally not large enough to present a health risk to employees although exceptions have been found.

Radium is found in most oil and gas fields in the world in varying concentrations. There is a potential to find radium in significant amounts in almost all types of equipment.

Radon is found in most natural gas deposits in the world. Radon is an inert, colourless and odourless gas. Radon itself does not present a health hazard because it is not easily absorbed into the body and is quickly cleared when absorbed.

Radon’s radioactive breakdown products, called radon daughters, may be hazardous. Radon naturally breaks down into radioactive metals before non-radioactive lead. Radon daughters may be inhaled or ingested when attached to scale or dust generated during equipment inspection and repair. Radon daughter exposure has been associated with an increased risk of lung cancer.

2.1 Short Term Health Effects

Unprotected overexposure to excessive amounts of radium may result in skin burns. Radon and its daughters do not cause any short term health effects.

2.2 Long Term Health Effects

Unprotected overexposure to radium and radium daughter contaminated dusts has been associated with an increased risk of lung cancer and leukemia. Most NORM material taken into the body is deposited in bones where it will reside for a long time. Radium will not clear from the body significantly over time. For this reason, all exposures should be kept below recognized exposure standards for the general public and unnecessary exposure to radiation should be minimized.

Excessive radiation exposure to the fetus may increase the risk of cancer after birth. The fetus is more sensitive to radiation than an adult so a woman who is, or is planning to become pregnant should work with her employer to ensure her radiation exposure from NORM is minimized.

2.3 Occupational Exposures
Because the gamma radiation emitted by radium can penetrate vessels and pipes, its presence can be detected from the outside of process equipment. Radon is difficult to detect as only two of its decay products emit gamma rays. Both of these daughters have half-lives of less than 30 minutes, and are only detectable when facilities have been operating for at least two hours.

Previous studies show that, in most cases, worker annual exposures due to gamma radiation levels from process equipment are zero or far below legal exposure limits. In a few cases, gamma radiation has been detected in individual equipment that has the potential to expose workers in excess of the prescribed exposure limits. In these rare cases, exposures can be reduced by restricting areas or by instituting operating procedures.

Equipment contaminated with NORM may also be hazardous when opened for inspection and/or repair. Exposure may occur by inhaling or ingesting radioactive dust generated during grinding, cutting or polishing operations. Until the inhalation/ingestion hazard has been fully evaluated at the worksite, precautions must be taken.

NORM contaminated work clothing may carry NORM scale and dust home, exposing family members.
3 What you can do to protect yourself from NORM

3.1 Monitoring

Outside surfaces of equipment suspected to be NORM contaminated must be surveyed for the presence of gamma radiation. A gamma radiation instrument equipped with a properly calibrated one or two-inch sodium iodide scintillation detector and a slow/fast response switch should be used. It is important that the process equipment be running at least two hours before any gamma measurement is made.

If the dose rate at the surface is greater than two times background, the equipment may be contaminated with NORM and precautions outlined in the following Safe Work Guidelines should be followed before any inspection or maintenance work is performed. Any equipment emitting a gamma dose rate greater than 10 microsieverts/hr may be hazardous and access should be restricted until evaluated by a radiation expert.

3.2 Safe Work Guidelines

Work procedures are recommended when maintaining NORM contaminated equipment such as pipelines, filters, pumps, lines, sludge or wellhead equipment. The exposure risk is highest when grinding, cutting, polishing or performing other work that may generate dust. Get good technical advice if you suspect a NORM problem. If there is NORM contamination, all employees should attend a NORM training course.

The work procedures should include provisions for:

- Equipment hazard evaluation when the equipment is opened. The evaluation should include the use of gamma detectors, pancake probe measurements and lab analysis for activity and identification of the isotope.
- Protection of workers from external gamma radiation, if necessary.
- Protection of workers from NORM contaminated dust.
- Controlling the spread of contamination.
- Waste classification to ensure NORM is controlled while minimizing waste volume.
4 NORM Contaminated Wastes

Norm contaminated materials exceeding 70 Becquerels per gram (70 Bq/gm) are subject to TDG requirements.

NORM contaminated materials with activities above 0.3 Bq/gm may be a hazardous radioactive waste. A competent radiation expert must perform a risk analysis before disposal can occur. Waste containing more than 0.3 Bq/gm may be disposed in a regular fashion depending on the total amount of waste, the radioactive isotope, isotope concentrations and the disposal location. A reputable laboratory equipped with proper equipment must determine activities.

NORM contaminated wastes may include filters from contaminated process streams, storage and transport tank scale or sludge, water separation tank sludge; well bore scale and sludge from pigging operations.

Production tubing contaminated with NORM scale should be capped, labeled and stored. Tubulars should not be rattled at the rig unless you are certain they are NORM free. Other wastes should be barreled – preferably plastic to prevent corrosion – labeled and stored.

NORM storage areas should be separated from other materials and entry should be restricted. The storage area requires periodic radiation surveys to ensure gamma levels are not increasing above hazardous levels and/or site contamination is not occurring from leaking containers.

All equipment, tubular and property should be evaluated for NORM contamination before:

- Transferring to another facility.
- Equipment sale to industry, farmers, cities, schools, etc.
- Descaling.
- Reuse of equipment.
- Donating equipment to farmers, cities, schools, etc.
- Offsite repair by third parties.
5 Contacts

If you have further questions or concerns, the following individuals or agencies have an interest in the issue of NORM and may be valuable references:

5.1 Alberta

Gary Hughes
Director; Alberta Human Resources and Employment Workplace Health and Safety
10808 – 99th Avenue
Edmonton, Alberta T5K 0G5
Phone: (780) 415-0612

Don Burke
Waste Audit
Alberta Energy and Utilities Board Operations Group
640-5 Ave SW
Calgary, Alberta
T2P 3G4
(403) 297-2496

5.2 Saskatchewan

Wayne Tiefenbach
Radiation Health Physicist; Saskatchewan Department of Labour Occupational Health and Safety Radiation Safety
1870 Albert Street
Regina, Saskatchewan S4P 3V7
Phone: (306) 787-4538 Fax: (306) 787-2208

5.3 British Columbia

David Morley; Radiation Health Scientist
Ministry of Health Radiation Protection Services
Suite 210, 4940 Canada Way
Burnaby, British Columbia V5G 4K6
Phone: (604) 660-6629 Fax: (604) 660-6663

5.4 CAPP

Gary Webster
Manager, Environment, Health and Safety
6 Bibliography


National Council on Radiation Protection and Measurements, Report No. 94, “Exposure of Populations in the United States and Canada from Natural Background Radiation”.

Hart, B.L., MD; et al; “Radon Is It a Problem?” Radiology 1989; 172:593-599.


Western Canadian NORM Committee, “Guidelines for the Handling of Naturally Occurring Radioactive materials (NORM) in Western Canada”; August 1995.
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 8  
6274 Avon-Lima Rd. (Rtes. 5 and 20)  
Avon, NY 14414-9516

November 13, 2011  
212 East 6th Street  
Watkins Glen, NY 14891

Re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT for LPG Storage Facility near Watkins Glen, NY

Mr. Bimber:

I am the International Salt/AKZO Plant Engineer and then Plant Manager who worked directly with TETCO to conduct the previous propane storage operations in what were then called Cavities 1 & 2 on the property that is now the US Salt plant. That was in the period 1964 through 1984. I continued at the plant to serving as Plant Manager to retire from there in 1997.

My main message in regard to this current proposal is that we have already proved over 21 years at the salt plant that storage can be done safely and in far-larger volume than the current 2.1 million barrel plan. Let’s get on with it!

The cavities are known to be ‘tight’ and tested frequently for mechanical-integrity. I am amused by the suggestion by some opponents that they will leak into Seneca Lake.

With the advances in design-practice and instrumentation, I have no doubt that the new facility would be even safer than ours of 40-some years-ago.

The fact was that we had no problem with ‘safety’ then! The challenges to operation came from other aspects of the process, like handling the large-volume of displaced-brine as propane went into storage, and then supplying that volume of brine back when coming out of storage.

During that former storage-period, I sometimes worked with Mr. Charles Jacoby, who spearheaded the initial collaboration with TETCO to do propane storage in those solution-mined cavities. As large and ready storage-vessels, they fill a huge need for economical storage. Mr. Jacoby understood the necessity for which cavities were needed for both natural gas and propane storage. He claimed in a paper presented at the Salt Symposium that underground storage costs $\frac{1}{20}^{th}$ to $\frac{1}{100}^{th}$ that of surface-storage.

I recall that in that operating period we had a maximum storage of 4 million barrels of propane. It was distributed as 3.2 million barrels in Cavity 1 (the one we leased to NYSEG for natural gas.
storage starting in 1994) and 0.8 million barrels in Cavity 2. Both of those cavities are located just to the east of the Compressor Facility itself, and about 2,500 feet below ground.

The pressure necessary for putting propane into storage was supplied by pumps over at TETCO. The brine displaced went to the Brine Pond that we built as part of that operation (with 75,000 barrels, or 3.125 million gallons capacity), and then was fed to the salt plant. That pond is still in use as part of the salt plant facility.

We had a far-smaller Brine Pond than the one now-proposed, because the brine operations for the propane storage were integrated with the Salt Plant’s operation in that ‘60s plan.

I’ve been here in Watkins Glen since 1964. It is apparent to me that the year-round jobs at the two salt plants provide much of the economic-underpinning for the local economy. The number of those jobs have been reduced by mechanization over the years. Those 8 or 10 jobs proposed to go with the new storage facility would make a valuable-addition to the local economy. The diversification of employers and industry-types would be good too.

It should be pointed-out that the propane-story preceded and then ran concurrently with the initial growth of the wineries on Seneca Lake. Therefore I categorically state the two are compatible.

Sincerely,

James A. Loose, PE
AKZO Plant Manager (retired)
Mr. Bimber:

Thank you for taking the time to consider me, the public, and our opinions, before making the very important choice (or not issue) to issue an operating permit for Inergy Corporation for its LPG (Liquified Petroleum Gas) facility on Seneca Lake.

I have lived in this beautiful region of New York for over two decades. My home is in Trumansburg NY, between Seneca & Cayugs lakes. I am a worker-artist and have been enchanted with this entire bio-region and its rich flora & fauna ever since I first saw this place.

Although Liquifed energy has been stored (by NYSDEC) for 40 yrs or so - Nothing will compare with Inergy's Plans for this beautiful Region. To create the largest LPG hub in the North east here, next to one of the biggest tourist distinations in the NE. strikes me as ill planned. I urge you NOT to issue any permits to Energy corporation... least we run the risk, sooner or later, of spoiling this beautiful and vital source our most important resource - water. When public servants, leaders or others make decisions they should remember our former inhabitants of this beautiful place...words: The choice to allow this development will affect 7 generations positively or not...Please, for future generations I make the right choice - no permit. Thanks Dumb.
November 12, 2011
Watkins Glen, NY

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 8
6274 Avon-Lima Rd. (Rtes. 5 and 20)
Avon, NY 14414-9516

Re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (DSEIS) for Finger Lakes LPG Storage, LLC LPG Storage Facility

Sir, and Involved Personnel of NYS DEC:

My assessment is that the dGEIS is ‘adequate’ and adding yet-further requirements not asked for up-front (such as the ‘QRA’) would be inappropriate at this late point.

I am David Alan Crea, age 59, living at 3353 Salt Point Road for nearly 9 years. I am a Licensed Professional Chemical Engineer (registration Idaho #3851). I currently work as US Salt’s Process Engineer to make food and pharmaceutical salts as economically & efficiently as possible.

Please note that I both work and live in what the LPG-Facility opponents would have you believe is the ‘blast-zone’ for the prospective LPG-Facility. Some have tried to promote it as a “bomb in the hillside above Seneca Lake.” I have had to publicly correct one speaker in front of the County Legislature and explain that LPG is not an ‘explosive’, but is instead a ‘flammable’-material and there’s a lot of difference between the two!

Believe me, I am NOT worried about these supposed false-facets of where I live and work!! Some have branded me a ‘company shill’, but that is not so. As a broadly-experienced Professional Engineer, I retain my independence of unique thought and opinion due to past-experience, current-position, and locations of both my home and workplace.

I have taken on as a personal endeavor (with no management-direction) a campaign that I call “At Least Let’s Try to Keep Them Truthful and Honest”. I have countered mis-truths where I could. As an engineer who deals with ‘facts’, I was both intrigued and concerned when I saw the proliferation of gross-distortions, mistakes, un-truths, and perhaps even deliberate-lies by the ‘NO-LPG’ group. I have made a two-page list of the Major Un-Truths spread by Gas Free Seneca, versus what I have ascertained as ‘The Facts’, and I will append that list to this testimony, just for the record. I will also append a sheet delivered to my residence that was prepared by Gas Free Seneca, to register as part of this process a document prepared and disseminated to spread misinformation.

Filename: Letter to NYSDEC David Bimber re dSEIS 11-12-11.doc
I am proud to say that I came in 2001 when US Salt was running-poorly, and as part of a small core-team nursed it back to health, assuring that those 125 jobs at the plant would remain and be ‘stable,’ for the employees and this community.

I worked as a ‘full-time contractor’ to US Salt from 2001 to nearly the end of 2007, then became an ‘employee’. The purchase of US Salt by Inergy in 2008 was a very good change for us, and brought management with new savvy and depth-of-resources. Inergy has greatly-accelerated the rate of capital-investment in the plant for modernization, and efficiency.

I am the person who routinely deals with US Salt's brinefield details and knows the various situations with the wells and mined-out cavities there. The current Maps and Cavity Section-Drawings we use have been prepared by a contract-drafter under the guidance of myself and geologist-collaborators.

I now have a total of 37-1/2 years of professional experience, working with chemicals needed by society, but which if given a chance can hurt you by chemical burns, thermal-burns, asphyxiation, poisoning, bone-degeneration, or nervous-system-damage. Each has its own hazards, all known to be controllable and routinely dealt-with by safe work-practices.

We manage risk in our workplaces, just as I personally do at home! There, I have appropriate ladders, electrical breakers, smoke & CO-detectors, flame-safety shutoffs, gasoline cans and bottles of propane, each with the features appropriate to provide for its safe use as-intended. We know how to deal with hazards, and we routinely-do!

Any student of local history will understand that the Wineries and related Tourism Industry grew and prospered since 1964 while LPG was being brought-in and stored, continuing with natural-gas storage since 1994. In fact, the past-storage volume of LPG in the salt-cavities was once as high as about 2x the present proposal (4.0 vs 2.1 million barrels). Most locals hardly knew all of that was occurring, because it is relatively un-noticeable and does not draw attention.

With the installation proposed of the 2.1 million-barrel Finger Lakes Storage Facility, some have decided to ‘fear it’ and the change that it entails. My opinion however is that this change will result in an overall good and desirable result. More Capital Investment logged to the tax-rolls, more jobs and more-diversity and stability in the local economy will be the expectable-result, and the ‘Silent Majority folks’ understand that.

It is obvious to me as an ‘outsider’ from Idaho that the ~210 Salt Plant Jobs in this community provide the ‘foundation’ of its local-economy, with their year-round, stable characteristics, and relatively-high pay-scale. As will be the new LPG-Storage jobs. The ‘steady’ nature of those jobs is a stark-contrast to the seasonal Ag, Winery and Tourism-sector workers.

The opponents of this project have touted statistics, which when reduced to $/job, indicate about $17k/year income from the typical ag-job, and $24k/yr for the typical winery/tourism job. It is unclear to me what these part-time people do for the winter, tourist off-season. Do they...
draw Unemployment? ...Welfare? ...or take those dollars to Mexico or a University to spend away from the community?

Contrast those to the year-round ‘industrial’ job paying ~$50k/year with perhaps another 30% in benefits. Those 8 or 10 jobs of an ‘industrial’ nature added to this community will be a welcome-addition to the local economy! The downtown businesses understand that—you do not find them on Gas Free Seneca’s ‘Business Consortium’ anti-LPG list!

Now, I’ve given a lot of lead-up to the actual topic of concern: “Is the Draft Environmental Impact Statement adequately-complete to be satisfactory?”

Delay for yet more-study is foolish. I have examined the full text of the dSEIS and find it to be thorough. It contains far-more on topics than I would have ever known might be cared-about. It IS ‘adequate’ as now-crafted, in my opinion.

We have a 1,500-page document now. The opponents want more, yet more! ...in an ongoing attempt at delay. It just doesn’t make any sense.

I ask NYS DEC to assess that this dSEIS is ‘adequate’, and that no requirements be added to further-delay the Project. The recent outcry for a ‘QRA’ seems to be a last-ditch attempt to build some other argument against ‘change’ because it might have a level of risk that some will predictably decry as “too high!”

Everything we do has risk attached to it. We routinely drive automobiles at high-speed, and accept those known relatively-high risks willingly and with hardly a thought.

I do not accept that this facility’s presence will threaten the Finger Lakes ‘brand’, nor that 4 trucks an hour leaving to make propane deliveries in the tourist off-season would chase the summer tourists away. Nor that the mere presence of a brine pond would either. A tourist at normal speed would be able to see the pond embankment for all of 12 or 15 seconds, and with screening-vegetation in place, most would probably not even notice it. Nor will it despoil the view from across Seneca Lake -- most of it will be hidden by natural vegetation that is 40-50 feet high.

Thank you for your consideration of my outlook.

David A. Crea, PE
3353 CR 30 -- Salt Point Road
Watkins Glen, NY 14891
Office: 607-535-2067 x211

Attachments: 1. Mis-Information Fact Sheet; 2. Gas Free Seneca Handout Sheet
Mis-Information Disseminated & Promoted by ‘Gas Free Seneca’ Group
Regarding the Proposed Inergy-Midstream “Finger Lakes Storage” LPG-Facility

1. Un-Truth or Error: New LPG-Storage is 74x as large as Enterprise/TEPPCO/TETCO’s capacity! (note one TV news-clip quoted a person saying ‘97x’ as-large)
   - Fact: Actual capacity-ratio = 1.75x (2.1 mil bbls/1.2 mil bbls = 1.75); call it ‘2x’

2. Un-Truth or Error: LPG-STORAGE CREATES SERIOUS SAFETY HAZARDS!
   - Fact: 47 Years Experience here already with LPG-Storage; up to 4.0 million bbls max! (per Jim Loose, former International Salt/AKZO Plant Manager & Plant Engineer)
   - Fact: LPG Safely Stored by TETCO in Mined-Cavity over 1985-current (1.2 mil. bbls)
   - Fact: New LPG Facility has ‘state of the art’ design subjected to ‘HAZOP’ Safety Analysis, advanced-instrumentation-monitoring & controls; 2.1 million bbls capacity.
   - Fact: Watkins Glen Fire Company trains for LPG already, due to TEPPCO’s LPG-Storage
   - Fact: Propane (3-carbon chain) & Butane (4-carbon chain) are ‘Flammable Liquids’, NOT ‘Explosives’; storage in the earth does NOT create an ‘underground-bomb’ (i.e.: do you have a ‘bomb’ under your patio-grill?)

3. Un-Truth or Error: PUTS LAKE, REGION, HEALTH AT RISK!
   - Fact: All risks are known to be manageable by Engineers & LPG-Storage Operators
   - Fact: HAZOP-Analysis and other modern safe-design techniques applied
   - Fact: ‘Catastrophic Failures’ of Civil-Engineered Double-Lined Ponds simply do not occur
   - Fact: Supposed ‘steep hillside’ Brine Pond Location is actually a ‘gently-sloping’ site
   - Fact: Brine Pond’s Site presents no unusual design-challenges to Civil Engineers
   - Fact: Propane is not an ‘Explosive’ (it is a ‘Flammable Liquid’); cannot burn without oxidizer being added to make a mixture
   - Fact: Salt Cavities CANNOT rupture catastrophically!
   - Fact: Any salt-bed cracks are ‘self-healing’ due to salt’s ‘cold-flow’ characteristic
   - Fact: Cavities in salt are proven to be leak-free by pressure-testing before use
   - Fact: Salt-cavity storage is more-rugged and safe than above-ground tanks (terrorism opportunity).

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1 Some assessed using the word ‘lies’ here in a previous-draft was too-judgmental, as it implied the creators of the GFS literature were therefore ‘liars’. OK; giving the unattributed-authors the ‘benefit of the doubt,’ I’ll allow that they might have been merely using extreme-hyperbole, and were terrible at math, and/or were mis-led by others. So, their output had ‘untruths’ in it, but were not technically ‘lies’, if you want to buy into that line of reasoning.

2 ‘Explosive’ means a mixture of both Oxidizer and Reducing Agent already-together, ready to react. ‘ANFO’ (Ammonium-Nitrate/Fuel-Oil); dynamite, and nitroglycerin would be examples. By contrast, a ‘Flammable’ material is only a ‘fuel’ and needs to have another component (usually the oxidizer) added before reaction is possible. Wood, Coal, paper, gasoline, propane and hydrogen are examples of ‘Flammable’ materials.

Facts vs GFS Un-Truths Handout rev 3 of 11-12-11
Assembled by David A. Crea, PE, Watkins Glen, NY
(Licensed Professional Engineer (Chemical); Idaho #3851)
**Mis-Information Disseminated & Promoted by ‘Gas Free Seneca’ Group Regarding the Proposed Inergy-Midstream “Finger Lakes Storage” LPG-Facility**

4. **Un-Truth or Error: IT’S A BAD DEAL!**
   - Fact: $30 million Addition to Town and County Tax Rolls cuts taxes for all residents
   - Fact: Stabilizes Local Economy against New York’s recession/depression and against seasonality of Tourism & Ag segments of Local Economy
   - Fact: Anyone who uses propane should welcome this to control-costs, especially the WINERIES and VINYARDS! (most, perhaps all, use propane in some way)

5. **Un-Truth or Error: BAD FOR OUR ECONOMY!**
   - Fact: Adds 8-10 FULL-Time jobs at $45-50k/each + ~30% Benefits
   - Fact: Direct Wages+Benefits impact to Local Economy is ~$450k/yr
   - Fact: Circulation-Multiplier of ~4x means total local-economic stimulation is ~$1,800k/yr from the Direct Wages+Benefits of this facility
   - Fact: Processing/Manufacturing Jobs stimulate Other Jobs (Suppliers, Truck Drivers, Maintenance, Restaurants, Wineries, Recreation, Grocers), so 8-10 LPG-jobs will stimulate more jobs yet for local people
   - Fact: This LPG Storage will lower propane costs to NE-USA propane consumers

6. **Un-Truth or Error: WINE AND BRINE CANNOT CO-EXIST!**
   - Fact: LPG in Salt-Cavities 1964-‘84: Tourism GREW!
   - Fact: LPG in Mined-Cavity 1985-now: Tourism GREW!
   - Fact: Natural Gas in Salt-Cavity 1994-now; Tourism GREW!
   - Fact: Salt-workers like wine too! ...I do my fair share....

7. **Un-Truth or Error: THIS FACILITY WILL BE ‘THE ENERGY HUB OF THE NORTHEAST’**
   - Fact: This is a quote taken out of context and blown-up. It actually refers to a collection of 6 Natural Gas and LPG-Storage facilities plus 3 Gas-Pipelines and Compressor-Stations located in the northern PA & southern NY region.
   - Fact: The 6 Storage Facilities are:
     - Arlington Storage – Steuben Gas (NG)
     - Arlington Storage – Thomas Corners (NG)
     - Arlington Storage – Watkins Glen (NG)
     - Arlington Storage – “Stagecoach” Owego (NG)
     - Inergy Midstream – Savona (or ‘Bath’) (LPG)
     - Inergy Midstream – Watkins Glen (LPG)
STOP THE PROPOSED LIQUEFIED PETROLEUM GAS (LPG) STORAGE FACILITY ON SENECA LAKE

THE PLAN
Inergy, L.P. of Kansas City, MO, purchased the U.S. Salt plant on the west side of Seneca Lake in 2008. This site is roughly 2 miles north of Watkins Glen, NY in the Town of Reading. The company plans to spend $40-50 million to develop LPG storage in underground salt caverns. The facility would house 2.1 million barrels (88.2 million gallons) of propane and butane, with plans to expand to a 5 million barrel storage capacity. As stated publicly by Inergy, the company plans:

"...to build an integrated natural gas storage and transportation hub in the Northeast."

The amount of gas storage for the initial phase of this project is 74 times larger than the Enterprise Products Partners/Teepco storage facility already present in the region, and spans 660 acres. Given its proximity to the water's edge, much of the facility would be visible from points south (Watkins Glen) and east (Burdet/Hector) of Seneca Lake.

This proposed LPG facility includes a 14-acre brine pit, a 60-foot burning flare stack, pumps, and compressors, as well as a transportation depot with trucks and train cars filled with highly flammable LPG moving to and from the facility year round.

WHY CITIZENS AND LOCAL BUSINESSES ARE OPPOSING THIS FACILITY

1. IT'S BAD FOR OUR ECONOMY
Further industrialization of this region will irreparably damage the growing wine and tourism industries that many local families have worked for several generations to develop. Inergy has lauded the project as the largest of its kind in the state of New York, with aims to make this region the epicenter of LPG storage for the entire Northeast. Expansion plans would make it one of the largest in the U.S., thus shifting the focus of tourism and wine production toward an industrial landscape.

2. IT CREATES SERIOUS SAFETY HAZARDS
Unfortunately, this industry is not without accidents. Most alarming are the risks of catastrophic fires and explosions of millions of cubic feet of volatile liquid gas that can affect more than a 3 square mile radius of the facility, encompassing Watkins Glen and surrounding homes and businesses. Our local, mostly volunteer fire departments are not equipped to handle disasters of this magnitude.

3. IT PUTS OUR LAKE, SURROUNDING REGION, AND HEALTH AT RISK
The proposed LPG facility represents air, water, soil and noise pollution concerns. This facility and the upsurge in truck traffic will dramatically increase the release of volatile organic compounds, which are known to be particularly harmful to grapes. Risks of gas leaks and compromised brine pits on steep slopes can devastate water and soil quality, as well as wildlife in and around the lake, and massive industrial lights and noise from the compressors, trains and trucks at the center of a tourist region are cause for serious concern.

4. IT'S A BAD DEAL
According to the DSEIS, Schuyler County gets 8-10 permanent, full-time jobs and approximately $440,000 per year to the county, school district and Town of Reading in lieu of taxes. Schuyler County Partnership for Economic Development receives a one-time payment of $290,000. Eight to ten permanent jobs is miserable compared to the jobs and revenue that would be lost in the wine and tourism industries if this deal goes through. The real money to be made from this project is Inergy's, and that money will be heading to Kansas City and the pockets of its investors, not the Finger Lakes. Tourism brings hundreds of millions of dollars into the region annually.

Gas Free Seneca was formed in early 2011 in response to Inergy, L.P.'s stated plan to "build an integrated gas storage and transportation hub in the Northeast" with the U.S. Salt plant north of Watkins Glen, N.Y. at the center. Today, the organization has grown into a coalition that includes many citizens, local business owners and regional environmental groups. It is the aim of Gas Free Seneca to protect Seneca Lake, its environs and local businesses from the innumerable risks to our safety, our water and our livelihoods that this LPG storage facility presents.

For more information and to get involved, please visit www.gasfreeseneca.com.

PO Box 333, Watkins Glen, NY 14891  www.gasfreeseneca.com
gasfreeseneca@gmail.com facebook.com/GasFreeSeneca
twitter.com/GasFreeSeneca
West King Road  
Ithaca NY 14850

November 13, 2012

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,

I am writing to express my concerns about the proposed LPG storage proposed to be built in Town of Reading. I owned a fruit farm at Rock Stream, in the Town of Reading, just north of the proposed storage facility. Do you know that there are fault lines on the Western shore of Seneca Lake. “Seismic activity” (tremors) were recently documented in Watkins Glen. I am writing to tell you that tremors are not a new or isolated thing in this area. As a farmer out on the land in all seasons and weather, I felt tremors several times there. These tremors were unpredictable, and made the earth move as though a giant mole were under the ground. A plastic water tank I was hauling behind my tractor, slipped out of its casing, shattered, and spilled water all over (including on me). What if this had been LP gas instead of water? What if there were thousands of gallons of LP gas stored under the ground next time these tremors start rolling? What if someone were to light a match or if the friction of the machinery were to cause a spark to ignite?

When experiencing these tremors when I was farming in Town of Reading I was so “shaken” (literally) that I sold my farm there. In 2010 I was visiting in California when a “rolling” earthquake hit there. It felt much like the tremors I’d experienced years earlier on my farm in Town of Reading. Farmers are an untapped resource about practical geology, because we live it every day, right under our feet. We are not holed up in a weather-proof office building watching “models’ created on computers. To a farmer, storing gas under Seneca Lake (or any of the Finger Lakes) is the height of foolishness. An application to store used nuclear rods in the salt mine was turned down because it would be unsafe. I respectfully ask, with the wisdom of an experienced farmer, “Why is the DEC even thinking of allowing LPG to be stored there?” A gas storage facility like this belongs in a flat place, far from the Seneca Lake with its tremors and steep rolling hills. Have you actually seen the Finger Lakes’ unusual geological formation?

What would happen if an earthquake or even continuing tremors which have already happened—were to happen in the Watkins Glen area if gas were stored there? Have you adequately studied the devastation to drinking water, people, public health, businesses, farms, and the tourist industry, that is likely to occur if LPG were stored in the salt mines under Watkins Glen? It is hard to imagine the small local fire departments, police, and Schuyler Hospital adequately handling this catastrophic medical and environmental emergency. Have you ever driven from...
Watkins Glen, or Rock Stream, up the winding hill to Schuyler Hospital on an icy winter night or during the peak of tourist season? Even if people injured in an explosion at the proposed LPG facility were able to get the hospital, there are only 25 beds there, usually nearly filled.

Why are you considering building this facility on a steep hillside, instead of on the flat? Each of the Finger Lakes and its hillsides are like a giant cereal bowl. If there were an explosion or even if the LPG were to escape unexpectedly, since LPG is heavier than air, would the gas become a vapor and settle over Seneca Lake like fog does there in some weather? If so, how would a little town like Watkins Glen evacuate all the people? Where would they go? Even once the people were hospitalized or dead, what about ongoing effects to farm land and drinking water?

An application to store used nuclear rods in the salt mine was turned down because it would be unsafe. I respectfully ask, with the wisdom of an experienced farmer, “Why is the DEC even thinking of allowing LPG to be stored there?”

In addition to this potentially devastating environmental impact, I am also troubled by the bad effects the proposed LPG storage would have on Seneca Lake, Watkins Glen, the rural way of life in the Finger Lakes, and the tourist industry and agriculture, which are closely intertwined. Everyone—locals and tourists have to look a ugly storage facility from the dock at Watkins Glen and from several of the wineries on Route 79 and Route 414, plus from Seneca Lake. Why would tourists continue to visit this area once they see that the beautiful views they once enjoyed have been replaced by this ugly site, and once they experience roads clogged by industrial trucks? What safety precautions are in place for the railroad cars (+- 30 per day, according to Inergy’s application) that would carry thousands of gallons of highly explosive LPG.

What will the impact be on local farmland? My former farm at Rock Stream has “Howard Gravely Loan” soil type, which is classified as “Grade A” farmland—the most productive partly because it is so permeable. This area has ideal soil for orchards and vineyards, because it water drains so quickly through the earth here, and down into Seneca Lake. If water drains that easily, what would happen in the event of an LPG accident?

If an environmental disaster occurs nearby, who would want to eat fruit or any other agricultural product grown on land poisoned by a gas explosion? It is hard to imagine that excellent farmland ever being restored to its current pristine growing conditions and beauty.

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 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 across Watkins Glen gorge? Poisons from the gas could leak into Seneca Lake, which provides drinking water for more than 100,000 people. Why take such a risk?
Inergy is an out-of-state company which told its investors that it plans to make the Seneca Lake LPG storage facility a model for their planned major distribution for the North East USA. If this permit is approved despite the many environmental and economic concerns, it would be a “green light” for Inergy to expand their plans. Inergy does not have a good reputation. This company has used “eminent domain” to take people’s land so they could expand their own domain. They have no reason to care about Seneca Lake or the people of this region.

Please require an independent Qualitative and Quantitative Risk Analysis (QRA) to evaluate the risk and impact that this facility would have on the region. Local governments and residents—not Inergy—should choose the people who does this analysis. It should be paid for by Inergy.

With recent major budget cuts at NYS DEC, how will you have the necessary trained staff to monitor this facility? Inergy, which is an out-of-state company, will reap all the benefits, while the people, land, water, and businesses of Schuyler County and the Finger Lakes Region will suffer extensive permanent damage. Who will be responsible for damage and wear-and-tear to the roads?

Thank you for considering our insights,

Claire Forest and sons
Thank you for reading my comment regarding the issue of storing liquid petroleum in the rock strata in the Finger Lakes. My background briefly most recent first: I retired from teaching science this past June 2011. My certification areas (Biology/Earth Science/Chemistry/General science). Prior to teaching I worked for Shepard Niles (crane manufacturing for ~14 years). While working at Shepard Niles I served on various education and safety committees. Before doing this I was employed by Texaxas Eastern gas company on RTE 14 north of Watkins Glen.

I attended the meeting held at the community center held by Inergy regarding the storage of and meet with a geologist who explained about the depth and size of this storage during break out sessions. It seems fairly safe to meet this depth in salt and pressure tested. I know this procedure has been going on there for many years. I also attended the first public comment session held at Watkins Glen School. I did not attend the second session because of a family function.

From my perspective a gallon of gas can be as dangerous as twenty five gallons. The storage in the ground is probably safe. The problem I see is the flow of gas to and from the storage. The transport system of pipelines, trucks, and rail for this volume, I think, brings some risk. I know it a my never happen, but any large leak would present a problem to folks living in the Seneca Lake valley. Propane has a greater density then air, so this gas would flow to a lower elevation. If a light wind is blowing from the north during this possible leak could this be toxic? Explosive?

Another point I did not see addressed in the DSEIS is that of security. With large volumes of gas being moved into a central location one may think that this could become a target from groups wanting to cause harm.

The folks say that having a large storage facility will save on costs and benefit consumers. I don't really believe that. I do feel the gas companies will get it cheaper because of a larger volume, but I think the savings will more likely go into corporate profits. Nobody said how much of a saving would be for consumers.
This small area located on Route 14 planned for increased petroleum storage has the potential to cause much harm to the environment and community. Is the NYSDEC willing to risk this? If you need any clarification, or would like to talk about this project I would be glad to meet. Again thanks for reading my comment regarding this issue.

Richard Hurley
2055 Hornby Road
Beaver Dams, NY 14812
TO:  David L. Bimber  
Deputy Regional Permit Administrator  
NYS DEC
FROM: Cynthia & Jon Rosse  
Residents of Schuyler County, NY
RE: Proposed Finger Lakes Liquefied Petroleum Gas (LPG) Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,
We have several concerns and comments regarding the proposed LPG facility as follows:

Concerns:
There are too many unanswered questions surrounding the safety and impact of the proposed facility, especially about the chain of accountability and cost burden should a catastrophic event occur as a result of said facility. Our local and county emergency management teams do not have the equipment to effectively handle that type of event, nor do they have the funds to purchase the equipment and provide necessary training. There is also no study of what effect the brine pond and any other emissions as a result of the proposed LPG storage would have on the viticulture of the county.

Several who have spoken in favor of the proposed facility compare it to existing sites in Savona, NY and Sayre, PA - yet neither of these sites are right next to a freshwater lake that provides drinking water for over 100,000 people.

These same proposed facility advocates state that LPG has been stored in the caverns for over 50 years with few concerns. True - but what Inergy is proposing is much, much larger in scale and requires a brine pond. We fear once the door to this magnitude of expansion is opened, it will be unstoppable.

Comments:
Inergy states that having the LPG facility in Reading will lower our propane costs. Unless they are directly providing the propane to us, how can they guarantee that?

Inergy also states that the building of the proposed facility will provide 8-10 "well paying" permanent jobs, as well as many temporary construction jobs. We are skeptical about this at best, given the track record of what has happened with the nearby hydro-fracking just over the Pennsylvania border. The construction jobs are going to out of state workers with drilling experience rather than training a local workforce. This has also resulted in extremely limited affordable housing, as well as difficulty in hotel availability in nearby Elmira. Is this what we have to look forward to should the Inergy proposal be approved?

We are not opposed to economic growth - but not at the expense of what is already growing - tourism and viticulture. 2 words every visitor we have invited to our wonderful area uses to describe it are "peaceful" and "beautiful". We need to keep it that way.

At the very least, we urge the NYSDEC to require a Quantitative Risk Analysis (QRA), at Inergy's expense, to thoroughly research every possible impact the proposed LPG facility would have on the Reading and Schuyler County area. Perhaps then the questions can be honestly answered and concerns satisfactorily addressed. If there is little risk, and much to be gained - as Inergy keeps stating - they should have no issue with having a QRA done.

Thank you for your consideration of our concerns and comments.

Sincerely,

Cynthia Rosse
From: jeffrey dembowski <jcdembowski@gmail.com>
To: David Bimber <dlbimber@gw.dec.state.ny.us>
Date: 11/12/2011 8:52 PM
Subject: Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

November 12, 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,

I own property in the Town of Reading about a mile south of the proposed LPG storage facility. When I purchased my property about four years ago, it was with the intention that my wife and I would eventually make it our permanent home. I had also hoped to buy adjacent properties - if they were ever to become available - with the intention of starting a tourism-based business. Much has changed over the past year. Since learning of the proposed LPG storage facility, our plans to restore our building and move to the area have been put on hold. Also, every property adjacent to ours is now for sale. We are no longer interested in purchasing additional properties in the area. I am certain I am not the only one who has put their plans to invest in the region on hold. Is the prospect of 8-10 permanent full-time jobs being offered by Inergy worth chasing away countless others eager to invest in the area? Are those 8-10 Inergy jobs and the risks associated with the LPG facility worth the damage that will be caused to the winery and tourism trade that has been growing and flourishing in the area for decades? I think not. I also feel compelled to tell you that I have begun to look for investment opportunities across the border in Vermont. Can New York State afford to lose more residents like me?

It seems that the DEC is looking at this project in isolation. You must
look at what the cumulative effects to the area will be if the Inergy proposal is approved. Does the DEC not frown upon "segmentation"? Inergy is currently looking to build-out their LPG storage capabilities. They also have an interest in expanding their natural gas storage capabilities and there is talk of the possibility of a compressed air storage facility all located on the U.S. Salt property. This sounds to me like a huge leap towards the industrialization of the area being done in a "segmented" fashion. There have also been attempts to distance this project from the hydrofracking issue. Even though they are two separate issues, they will have overlapping effects on the community. The LPG storage facility will bring additional truck and rail traffic to the area as well as noise, air and light pollution. If gas drilling ends up occurring in the area, or anywhere near it, that activity will add even more truck traffic and noise, air and light pollution. All of these eventualities must be considered.

As I am sure you are aware, the topography of the Finger Lakes region creates certain limitations for transportation. Most traffic must move along a few, limited north-south corridors. In the dSEIS, Inergy only takes into consideration the activities that will take place at, or immediately adjacent to, the proposed LPG storage facility. This is not a realistic approach in gauging the true impacts this facility will have on the immediate area or on the region as a whole. The little village of Watkins Glen is already plagued with bigger city traffic issues. Inergy's claim that their facility will not adversely affect traffic conditions in the region is disingenuous. Also, while there has historically been commercial rail traffic along the Norfolk-Southern lines, never before was that traffic predominantly carrying large volumes of highly explosive gases. A train derailment of coal cars is a very different event than the derailment of a long string of LPG tanker cars. I do not see in the dSEIS where Inergy assesses the vulnerabilities of moving large volumes of LPG traffic (both truck and rail) along all of the likely used routes in New York State. Much recent attention has been given to the widespread deteriorated condition of many of New York State's roads and bridges. Much of the traffic associated with the Inergy facility will traverse our State's deteriorated infrastructure (beyond the three bridges in the immediate area of the proposed facility that are curiously being rebuilt at the time of this writing). A visual inspection of many of the railroad bridges that span local gorges does not instill confidence that LPG can be transported safely.

Inergy claims that their proposed facility will not create any problematic noise issues. I beg to differ. Having once lived next to a rail siding, I know how noisy they are. I also know how sound travels in the Finger Lakes region. It is not at all uncommon for traffic, or other sounds for that matter, to travel across the lake. This past summer, I experienced first hand how the sounds of Inergy drilling test wells at the U.S. Salt facility on the west side of the lake carried across the water to the east side. It was loud, disruptive and unrelenting. Why would any tourist (or area resident for that matter) want to spend their time and money to "get away from it all" in a place where at anytime of the day they may hear train cars coupling and decoupling, warning whistles blowing, freight cars rumbling and tractor trailer jake brakes thudding through the atmosphere?
Inergy also claims that their facility will hardly be noticeable. Really? A fourteen acre brine pond situated on a cleared twenty seven acre parcel perched atop a western slope of Seneca Lake immediately adjacent to a State highway will not be noticeable? Right. Inergy claims that the brine pond will only be full for a short while in any given year. They say this to try to dispel any fears that a huge volume of brine may spill into the lake. So, when the pond is not full of brine, as Inergy claims it will be most of the time, we will get to look at a grimy, slimy black pond liner baking in the sun. No amount of landscaping can hide or ameliorate this blight on the landscape. The same holds true for the proposed rail siding. Dozens of LPG tanker cars - no doubt some of them covered in graffiti - will be visible from Rt.14A. What about the proposed 60' flare stacks? When active flaring is occurring I believe these will be extremely difficult to camouflage as well. Already the U.S. Salt plant, Enterprise storage facility and former NYSEG storage facility contribute significant night time light pollution. Inergy’s proposed facility will only worsen the situation.

The dSEIS does not adequately consider historic or cultural resources in the area. Recently, the Village of Watkins Glen applied for historic district designation along Franklin Street (the main street through town). The increase in truck traffic will absolutely have a negative impact on the historic resources in that district. The issue of potential historic Seneca Nation archaeological sites located in the project area is glossed over. At a minimum, a Phase I archaeological study must be conducted of all project areas to determine if any sensitive sites are present. What potential negative impacts will this facility and its associated activities have on Watkins Glen State Park? What will visitors to the area think when they are marveling at the wonders of the Watkins Glen Gorge and a freight train carrying tens of thousands of gallons of LPG is rolling along above their heads? Rt. 414 on the east side of Seneca Lake is a designated scenic byway. How will the view shed from Rt. 414 be affected by Inergy’s massive brine pond, rail siding, compressor station and flare stacks? These are just a few of the historic/cultural resources that will be negatively affected if this project is constructed.

Most of my comments so far have been on issues that are almost certain to occur and be negative to the area if Inergy gets approval to build their LPG storage and transportation facility. Many others with greater expertise than I have commented on the potentially disastrous environmental risks this facility poses to the area such as: catastrophic brine pond failure and release of super saturated brine into Seneca Lake; brine pond leakage and contamination of ground water; potential harm to migrating waterfowl and other wild life from contact with brine pond contents; potential catastrophic explosions caused by accidental releases of LPG from the salt caverns, truck and train transfer facility, or from truck and/or rail accidents; pollution from VOC’s and their impact on agricultural crops and humans; detrimental noise and vibrations from compressor stations and an increased risk to pedestrian safety caused by an increase in commercial...
truck traffic to name a few. There seems to be a valid concern of
geographic fault lines that run along the west side of Seneca Lake and what
an increase in seismic activity may have on salt cavern stability. There
is also concern over whether local emergency responders would be able to
handle a catastrophic event at Inergy's LPG facility.

I believe it is also worth pointing out that Inergy has given conflicting
accounts of what its intentions are. The company says one thing to the DEC
and the local community, but has a different message for its investors and
the SEC relative to its expansion plans. The company also has a history of
propane price gouging, so it is a little hard to swallow their line that if
they are allowed to build their facility, local propane prices will be
lower.

In summary, I believe the DEC should deny Inergy's request to construct the
proposed LPG storage and transportation facility. If built, the facility
poses too great a risk to area residents' and tourists' safety, health and
way of life. It also poses too great a risk to the established local
economy which is based on wineries, agriculture and tourism. I do not
dispute the need for energy products and associated infrastructure.
However, the west side of Seneca Lake is the wrong place for such a
facility. Others have argued that it should be allowed because there is
precedent for storage in the area already. My response to that is
that there is a closed and leaking landfill in the Town of Reading, too. Just
because we have it, does not mean we should have more of it. The same
holds for LPG storage. Let's not expand an inappropriate activity for the
area just because it has been done before. The area needs to move away
from activities that harm the environment and that harm the long
established and growing tourist and agricultural economy.

Thank you for your consideration.

Jeffrey C. Dembowski
335 State Street
Albany, NY 12210

and

3428 CR 28
Watkins Glen, NY 14891
From: <dhursh@stny.rr.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/13/2011 10:21 AM
Subject: Deny Inergy's Proposal To Build & Operate a Liquified Petroleum Underground Storage Facility In Reading, NY (DEC Facility ID 8-4432-00085)
Attachments: Request to Deny LPG Underground Storage in Reading NY ID8-4432-00085.doc

Please deny Inergy's proposal to build & operate a liquified petroleum storage facility in Reading, NY for the reasons listed here and in more detail in the attached document.

Failure of either the brine storage pond or the petroleum storage caverns would cause irreparable and permanent environmental damage to Seneca Lake.

Require a Quantitative Risk Analysis.

Require a Quantitative Remediation Plan that described precisely the means for complete remediation of Seneca Lake back to its current condition, how long it would take, and how much it would cost.

Require escrow of funds sufficient for complete remediation prior to commencement of facility being built or operated.

Sincerely,
David Z. Hursh
Anne G. Hursh
637 Walker Hill Rd.
Waverly, NY 14892
From: Bill Murphy <murphy.bill007@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 11/13/2011 8:22 PM
Subject: Hydro-Fracking: Just Say No!

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: Hydro-Fracking in New York State

Dear Mr. Bimber,

Just say "No!" to hydro-fracking in New York State; and thank you for actually protecting my child's drinking water by doing so.

Sincerely,
Bill Murphy
Sir:
I am writing to you with serious concern regarding the proposed regulations regarding hydrofracking in New York State. My greatest concern is regarding the negative impact hydrofracking will have on the people who live in central New York. I have read much of the material furnished by DEC, and yet I am left with great anxiety that due to the few personnel available at the DEC able to truly assess the real implications of this development and the great numbers of money and influence the industry has, truth will not prevail.
Have you truly studied the impact that hydrofracking will have on my family: The quality of water; the safety of the process; the noise and light pollution and the degrading of quality of life. Let me be most specific: I live two miles from Cayuga lake, my water comes from a well and I am intergally connected to the aquifer that would be effected. Can you unhesitatingly state that my family and I will not suffer by the short shrift the DEC can give to this issue.
Please respond, before any decision can be made.

Citizen David Kooperman
From: David Hirsch <dhirsch11@gmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 10:20 AM
Subject: Seneca Lake

I am writing to express my concern about the possibility of a massive storage facility for up to 100 million gallons of brine related to the storage and distribution of LPG near Watkins Glen. Seneca Lake and its surrounding area are too unique and precious for what I believe to be a risky facility that could create enormous, unfixable harm.

I would hope the DEC is investigating other forms of power generation in our area: wind, solar or biomass.

David Hirsch
327 tupper rd
spencer ny 14883
November 13, 2011

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

Re: Proposed Finger Lakes LPG Storage facility located in Reading, New York (DEC Facility ID 8-4432-0085)

Dear Mr. Bimber,

The intent of this letter is to provide both generic and specific comments regarding the draft Supplemental Environmental Impact Statement (dSEIS) for the Proposed Liquefied Petroleum Gas Storage Facility to be located in Reading, New York. I am a licensed Professional Engineer in New York State, and am reviewing the dSEIS as a concerned citizen of New York interested in preserving the natural beauty of the Finger Lakes region for generations to enjoy. I respectfully submit the following comments for consideration and evaluation by the New York State Department of Environmental Conservation (NYSDEC).

Comment #1:
The DSEIS lacks full evaluation of the risks associated with storing 2.10 Million Barrels of Liquefied Petroleum Gas (LPG) in one location given the proximity to underground and surface drinking water sources, as well as the proximity to local Vineyards, tourist accommodations, Seneca Lake, farms and local homes. These risks include, but are not limited to, groundwater contamination from both salt water brine, or LPG, catastrophic failure of the storage facility endangering the lives of nearby citizens and visitors, the destruction of personal property, local highway and rail lines, and the contamination of Seneca Lake itself. It seems the null alternative, or the possibility of simply not allowing this project is not discussed as a possibility. It is imprudent not to perform an analysis of the true worst case scenarios of failure of both the gas storage facility, as well as the brine storage pond. Said analysis is not included in the DSEIS which is the primary
glaring shortfall of this document. As I understand from reading an article entitled, "Gas Storage and Single - Point Failure Risk" by John M. Hopper, there are 29 salt water cavern facilities currently in existence currently, with 10 catastrophic failures since 1972, with 8 since 2002. This data places the odds at about 1 in 3 for catastrophic failure during the operation of the LPG Storage Facility. Given this incredibly high catastrophic failure risk, this facility should NOT be constructed.

Comment #2 Transportation Impacts:
The DSEIS does not contain a thorough traffic impact analysis as related to the state highways that will be most affected. However, from my simple traffic analysis, State Route 14A currently has an Average Daily Traffic count of 1,640, with 11% trucks, representing 180 truck trips per day. The proposed facility is slated to be equipped with 2 loading bays capable of handling 30 trucks per day, with expansion indicated to 4 loading bays, bringing the total trucks to 60 per day. Since traffic counts are trips, this represents the potential addition of 120 truck trips per day, or a 67% increase in local truck traffic on Route 14A. If only half of the traffic travels up Route 14A this still represents a 33% increase in traffic due to this facility alone. Prior to finalization of the DSEIS a more thorough traffic analysis as well as a review of the proposed facility entrance onto the state highway should be conducted.

Comment #3 Highway Deterioration:
The 33% increase in truck traffic on Route 14A will greatly accelerate the deterioration of this highway. The DSEIS lacks any indication that Finger Lakes LPG to be held responsible for roadway repairs in order to maintain a safe passible highway. Consequently, the New York State Department of Transportation (NYSDOT) is planning projects on “Priority Routes” due to a continued lack of adequate funding. Given the rural location and relatively low volumes of roads in the area surrounding this facility, Routes 14 and 14A will not be slated for pavement rehabilitation projects in the near future. I feel a full analysis of the increased truck traffic on the local highways needs to be performed and made available to the public prior to finalization of the DSEIS outlining the accelerated deterioration of roads and the negative impact to the travelling public due to potentially unsafe highway conditions.

Comment #4 Brine Pond Dam Classification
The brine pond embankment was designed as a Class B Dam, or Intermediate Hazard, though is “not considered to be an earthen dam”. With the proposed brine pond being designed as a man-made embankment designed to impound millions of gallons of brine solution, it is misleading to the public for the DSEIS to state that an earthen embankment of this nature is “not considered to be an earthen dam.” According to the NYSDEC Regulations regarding Dam Classifications, a High Hazard dam is classified
as follows: “Class “C” or “High Hazard” dam: A dam failure may result in widespread or serious damage to home(s); damage to main highways, industrial or commercial buildings, railroads, and/or important utilities, including water supply, sewage treatment, fuel, power, cable or telephone infrastructure; or substantial environmental damage; such that the loss of human life or widespread substantial economic loss is likely.” Downhill from the proposed brine pond, there are existing residences, a railroad, Seneca Lake (a AA rated drinking water supply) which places the proposed Dam into the “High Hazard” category. The DSEIS should provide to the public further engineering analysis of the proposed embankment to consider the impacts of a pond liner failure, because if the embankment soils become saturated, several modes of earthen dam failure are possible, resulting in a complete failure of the brine pond.

Comment #5 Brine Pond Slope Analysis
The brine pond engineering report provided a detailed slope failure analysis for slope modifications near Route 14A, however, a complete slope failure analysis was not conducted for the change in conditions below the proposed brine pond. In a review of the Geotechnical Engineering Data, it was found that the rock encountered in the Geotechnical Investigation slopes between 11% and 12%. Given the large amount of soil being moved to construct the brine pond, combined with the groundwater drainage system proposed, a substantial risk of a slide along the interface between the soil and underlying rock exists. The factors increasing the likelihood of a slope failure include, but are not limited to; high water table, intended design to continually lower the onsite water table, steeply sloped rock interface, relocation of thousands of cubic yards of onsite material, significant steepening of the slope facing Seneca Lake and the utilization of the onsite Glacial Till soil, inherently difficult to place in a stable manner once disturbed. A slope failure would cause a catastrophic failure of the brine pond, risking life and property downstream as well as the water quality of Seneca Lake. A detailed Geotechnical Engineering Report focusing on the risks of slope failure at or near the brine pond should be added to the DSEIS for public review.

Comment #6 Brine Pond Leak Detection System
The leak detection system and brine pond liner design are lacking. Geotextile liners are generally utilized over cushion sand in order to prevent abrasion or puncture. The proposed brine pond liner however is placed directly on a combination of NYS DOT Specified #1 and #1A crushed stone, a very abrasive sharp stone. The loading and unloading of the brine pond has the potential to puncture the outer layer of the pond liner, rendering the leak detection system useless. Any leak through the inner brine pond liner will leak out into the crushed stone layer, which is designed to rapidly remove water from beneath brine pond. Therefore a brine solution leak is rapidly carried away as if it were ground water. The proposed pond liner and leak detection
system are insufficient and need to be re-evaluated especially considering the massive quantity of brine solution slated to be stored in such close proximity to Seneca Lake.

Comment #7 Brine Pond Liner Test Strips
Monitoring the condition of the brine pond liner by utilizing in-situ samples for future durability testing seems plausible, however; once installed how is the public to be assured that the testing will be completed at the proposed 5 year intervals? Due to limited staff at the LPG Facility and limited NYSDEC staff resources, there is a high potential for this testing to simply be forgotten. What party is responsible for requesting the testing and determining when the liner is no longer considered durable?

Comment #8 Brine Pond Freeboard Capacity
Upon review of the design assumptions, the Probable Maximum Precipitation (PMP) of 25 inches utilized is an outdated number. Current climate data illustrates a higher PMP and the design assumptions should be updated to reflect current weather conditions. Since the proposed brine pond is considered to be sealed, an explanation needs to be provided as to why a reduction in the PMP to 40% is utilized. The design freeboard should be increased to handle an entire Probable Maximum Precipitation event once updated using current data.

Comment #9 Brine Pond Wind Assumptions
A design peak gust wind velocity of 50 miles per hour was utilized in both the uplift potential of the brine pond liner, as well as in the wave run up calculations. From a quick review of NOAA Climate data, it is apparent that peak gust velocities between 74 and 76 miles per hour were recorded in Buffalo, Binghamton, and Rome, New York. Given the proximity of the brine pond to the clear area of Seneca Lake, including significantly higher recorded wind gusts at said locations, a higher wind velocity design assumption should be utilized for both the liner uplift as well as the wave run up calculations.

Comment #10 Drainage Swale Design Assumptions
The drainage swale designed to carry storm water around the proposed brine pond appears to divert water from an existing path. The proposed drainage swale runs along the toe of the brine pond embankment, and existing design calculations utilizing a “100 year” rain event are inadequate. Once the drainage swale become overwhelmed, the embankment is subject to erosion, drastically increasing the chance of embankment failure. As mentioned in Comment #4, the brine pond should be constructed as a “High Hazard” dam. High Hazard dams require provisions to prevent failure utilizing a “500 year” rain event. Recent extreme weather such as Hurricane Irene and Tropical Storm Lee which devastated infrastructure designed for the “100 year” rain event, further
outline the need to utilize the “500 year” rain event. Designing to the “100 year” rain event is insufficient and does not support the statement on page 60 which reads “Therefore, while a complete structural failure of the brine pond, however unlikely, may potentially pose a threat to vegetation and soils in the immediate vicinity, Finger Lakes has taken all necessary precautions to prevent a failure, including the chosen liner, monitoring requirements and repair and replacement procedures.” All necessary precautions include designing to the “500 year” rain event.

**Comment #11 Underground Storage Pressures**

The proposed storage facility has been designed to maintain a pressure of 1,000 psi when storing LPG underground. This intense pressure is capable of pushing either salt water brine or LPG through any previously undetected underground fissure, risking brine or LPG being released into the ground to an unknown location. The reliance on underground caverns for the storage of 2.1 million barrels of LPG under such intense pressure places every nearby property at great risk. The technical information related to the analysis of these caverns has been deemed “proprietary” and unavailable for public review or comment. The glaring shortfalls noted in the remainder of the DSEIS lend little faith that the integrity of the underground caverns has been properly and thoroughly evaluated. The track record of the existing underground LPG storage facilities referenced in Comment #1 highlights the fact that too many unknown or unpredictable variables exist to truly assure public safety in the vicinity of this project.

**Comment #12 Nearby Drinking Water Wells**

The DSEIS does not contain any requirement for Finger Lakes to monitor drinking water wells of nearby property owners. Given the high pressures to be maintained in the underground facility, the potential for either brine or LPG migration into nearby drinking water supplies exists. A proposed set of testing parameters and distance from the underground storage facility of private well testing should be provided for public comment and eventual inclusion into the DSEIS.

**Comment #13 Cavern Footprint**

The application for the LPG Storage facility states that Finger Lakes shall own 75% of the storage rights within the reservoirs. The footprint of the storage caverns does not appear to be publicly available, but it would seem that Finger Lakes would need to acquire 100% of the storage rights. Do nearby landowners have the right to refuse the use of any caverns below their property for the use of storage of LPG whether or not they own the mineral rights?
Comment # 14 Remediation of Groundwater
The DSEIS discusses the unlikely nature of a cavern breach, any loss of LPG or brine outside of the salt caverns, but the distinct possibility still exists. The DSEIS should be amended to include a thorough discussion of remediation in the event a breach occurs and drinking or agricultural water supplies are impacted. The nearby residences, farms, and wineries stand to lose their livelihood should they lose their drinking water supply be contaminated. If no viable remediation method exists, than the LPG storage facility should not be allowed to commence operations.

Given the obvious threat this project brings, it is only reasonable to require an independent Qualitative and Quantitative Risk Analysis to thoroughly and impartially evaluate the risk and impact this facility poses to the community.

I look forward to your response to the enclosed comments.

Sincerely,

Gregory S. Wichser, P.E.
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516  
11/14/2011

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

Dear Mr. Bimber,

The Finger Lakes, LLC LPG Underground Storage Facility will contribute to significant environmental and economic impacts. These impacts have not been sufficiently addressed by Inergy, a violation of DEC policy. The environmental impact statement authored by Inergy is inadequate for several reasons, the most obvious of which are the fact that Inergy did not properly address impacts on endangered or threatened species and migratory birds; impacts on waterbodies, wetlands and groundwater; the economic impacts on the local winery tourist industry, the increase in associated road maintenance costs and the complete lack of a spill prevention and reaction plan. Inergy also failed to consider viable alternatives to an open-air brine storage pit.

Species
The effect on the threatened plant Leedy’s Roseroot has not been thoroughly addressed. This extremely rare cliffside-dwelling plant is easily dislodged by surface runoff from disturbed lands, from the cutting of uphill trees and clearance of vegetation. The effects of this storage project on Leedy’s Roseroot have not been thoroughly addressed.

The impact on migratory birds was not studied at all for Inergy’s environmental impact statement (EIS). Migratory bird season coincides with the time of year when the fourteen-acre open-air brine storage pit will be at its fullest, which will confuse migrating birds into settling into highly concentrated salt water.

There are over 190 species listed as endangered, rare or threatened by NY state that are found in the area, however, the impacts on any of these species was neither studied nor mentioned by Inergy.

Waterbodies, Wetlands and Groundwater
The impact on the wetland located on the project site has not been examined. Additionally, a thorough examination of possible groundwater pollution in the event of a breach or leak was never conducted, despite the fact that the groundwater is a mere 1.3 feet from the surface of the project site.

Inergy’s impact statement quickly dismisses the need for a study of impacts on fisheries and waterbodies by concluding that there will be no impact. At the least, the issue of runoff into Seneca Lake must be addressed.
Brine Pit

Inergy recognizes that some areas under the storage pit consist of “unstable subgrade soils” but mitigation of this issue is not addressed. The same is true for the fact that the pit will be on a downward slope.

The calculations of peak gusts, maximum rainfall and maximum wave height in the storage pit are insufficient. There is a mere 36” from the predicted fall fill line of the open pit to the top of the embankment. Inergy’s report states that a maximum rainfall of 10” was assumed and a maximum wave height (based on average peak wind gusts) of 20” was assumed. This leaves only 6” for error. Inergy’s report states the unlikely chance of high rainfall but then goes on to state in the “Brine Pond Failure” section that the Northeast is known for heavy rainfall and this would help dilute any sodium that escapes. In this respect, Inergy’s EIS directly contradicts itself.

Inergy’s EIS states that the pit will be monitored daily during heavy rainfall. This is inadequate as hourly monitoring is necessary. Such monitoring should be conducted during periods of heavy snowfall, high winds and during spring runoff as well.

Additionally, when the brine pit failed initial wind testing (to determine whether wind uplift was an issue,) Inergy determined that sand filled tubes would be used to weigh down the liners to prevent uplift. No further studies were conducted to determine whether these sand filled tubes would remedy the problem.

Inergy’s statement discusses what may happen in the event of a leak in the brine pit, the issue of a breach (or berm failure) is never discussed.

Alternatives
 Alternatives to the brine pit were not thoroughly explored by Inergy, as the only other alternatives evaluated were other open-air brine storage pits in various locations on the project site.

Economic Impact
 The economic impact on the tourist industry was not fully evaluated in Inergy’s EIS. The visual impact of a large flarestack, 5,000 gallon concrete holding tank, 27 acre wide and 51 foot tall brine storage containment area has not been assessed in these terms. Further, the impact on roadways in the area (including increased traffic and increased maintenance due to wear and tear) has not been fully addressed by Inergy. Both increased congestion and noise pollution from trucks must be addressed. Noise pollution from increased train transportation must also be addressed, including its effects on local parks, visitors to the area, and residents.

Soils
 The soil in the project area is poorly drained in some areas and the effect of runoff from the project site has not been thoroughly addressed.
Prevention & Reaction
No formal plan for prevention of spills and other accidents was submitted. No formal plan for reaction and clean up to such an event was submitted. Inergy states that they “intend to” have them in place.

Additionally, there has been no assessment of what would be done in the event that both geomembrane liners leaked. There is no mention of when, if ever, the pit would be drained and evaluated for such leaks. This must be done periodically to ensure the integrity of the liners.

Related to this issue is the fact that no study was conducted to discover the source of the sulfurous odor coming out of a well during construction. This was merely written off by Inergy as “common” and does not bode well for the company’s policies relating to environmental health and safety standards.

Seismic Events
No studies were conducted or statements made on the effect of a seismic event on or near the project site. This is particularly important because there have been five such events in the area since 2001 alone. The frequency and intensity of seismic events may increase due to the nature of underground storage in salt caverns and its effects on faults, and the onslaught of hydraulic fracturing, a practice expected to begin in this area.

Thank you,
Corinne Bell
Dear Mr. Bimber,

I am a Physician Assistant at Schuyler Hospital in Schuyler County. I have lived on a farm here for 26 years, and had the pleasure of watching it grow and develop into fine vinifera vineyards which now support our winery, Damiani Wine Cellars. My husband's family farmed this land before us and his father was an agricultural agent for the state.

As the pressures on land and water increase, and the public health issues related to water supply grow around the world, and the fragility of the water systems grows, it is mind boggling to me that we would not be treating the Finger Lakes with the utmost care and protection. These deep, glacier lake are not only a watershed for thousands of people, but also create the microclimate that allowed this agriculture and tourism mecca to develop, and require our state's highest degree of protection. As a medical professional for 26 years, caring for the people of this area, I believe it is a duty to protest the development of the salt caverns for storage of LPG. I have attended many of the public meetings, read hundreds of pages of documents, and participated in the call for our businesses and families to unite against this project. The water WILL be unacceptably at risk. That, in my opinion, is enough reason to halt this project. The dozens of other reasons related to the change in our landscape, the threat to our livelihoods, the increase in pollution, the temporary populations that will invade, and the obvious hand in hand relationship to fracking are all extremely compelling but the water reigns supreme as why the project should be halted.

Other medical communities have signed position statements on this issue as it relates to fracking. The Tompkins County Medical Society is on record to support the ban of fracking in NYS. The Bassett Medical Society in Cooperstown has done the same. Hundreds of physicians have spoken out against this threat to our public health.

and while the LPG project leaders repeatedly and erroneously beg consideration UNRELATED to fracking, the public is no longer ignorant. The mounting evidence of the accidents in this industry across the country are deeply disturbing and present unacceptable health risks for which we are not prepared. I can repeat the details of the engineering concerns that I have learned about, the brine pond, its distance from the lake, the incidence of salt caverns accidents, the risks during unprecedented rain and flooding, the fault lines on that side of Seneca Lake, etc, etc. We have long had the sweet appreciation of this lake simply for it's beauty; we
would be naive to treat it in any way other than a critical, unrenewable resource on which the life and breath of our people depend.

I beg of you, as lead person from the DEC for this project, do not allow it to proceed. It represents an egregious insult to the safety and health of our people.

Sincerely,

Paula Fitzsimmons, P.A.
From: Erica Drake <eldteacher789@yahoo.com>  
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>  
Date: 11/14/2011 12:33 PM  
Subject: LPG Storage on Seneca Lake

Dear Mr. Brimber,

I am writing to you as a long time citizen of the finger lakes region. I have seen industry come and go in our area and leave nothing but crap behind. I know this plan to store the liquified petroleum gas is "safe and not harmful". I have a hard time believing that pumping the empty salt mines full of LPG will not do any damage to the lake or the ground water. It just doesn't make sense. Adding more truck traffic and a huge brine pond to our land scape will do nothing but drive our housing value in to the ground as well as destroying our already bad roads. If you have spent any time in downtown Watkins Glen there are already massive amounts of trucks rolling thru there getting to the salt plants we do not need more. 

It surprises me that storing LPG sounds like a good idea to anyone? Let's put LPG into the ground where we plant our crops, get our water and make our living from.... Does that sound smart to you?

I moved away from this area for ten years. I moved back a year ago hoping to buy a house and start a family here where I grew up. Now I find myself waiting longer because I am not going to invest my time and money in a place that will be ruined! No clean water, no way to grow food and roads that aren't even drivable. I truly can't believe that the travel and tourism industry that we have worked so hard for over the last 30 years is about to be thrown our for 8 high paying jobs that won't go to local people! There will be nothing left except the memories I have left from my childhood.

I hope you read this and consider the choices you are making and how there will be no more finger lakes wine region and all the thousands of people you will hurt. Not to mention the natives who had this land before we did.

Thank you for your time.

Erica Lynn Drake  
Educator of the youth.

Live Happy Love Happy & Be the Change
My late husband and I moved back to the Fingerlakes region to spend his last days here. Because of the closeness to the land and the water, there is no other place on earth like our lakes. Do not give it over to useless greed. The dirty water, the trucks running the quite roads all hours of the night these are not what we need when we think of moving forward with life in the fingerlakes. Make a decision based on good hard facts gathered with what you are sworn to protect the environment. Not some fat cat's pocket that doesn't live here and has never even passed thru New York state

Mrs. Diane K. Theetge
3046 Center Rd.
Ovid, NY 14521
From: Becca Harber <becahbearrr@yahoo.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 6:04 PM
Subject: comment on DSEIS for LPG storage proposal

Dear David Bimber,

I hope I understood the DEC website correctly when it said that the contact person cited below was the person to whom DSEIS comments are to be sent. So here are some comments of mine about the proposed LPG storage facility and transportation hub:

1. The proposed plans submitted by Inergy and covered by the DSEIS are only the first step of an enormously larger propane and natural gas storage facility in those salt caverns according to Inergy's descriptions of what it intends to do in the not-so-distant future on their website. I consider a DSEIS that omits their longer-term intentions and plans to be seriously flawed in terms of thoroughness. If DEC only considers Inergy's first steps, much more serious risks of fires, explosions and other realistic or possible effects, such as those of increased railroad and truck transportation on the local communities and regions will not be addressed adequately. Because, according to reliable statistics about fires and explosions in large-scale liquid gas storage in salt caverns like those in the proposal, serious and/or catastrophic fires and/or explosions have happened in 40% of those storage facilities. All the different environmental, social, economic (like tourism), safety and other negative impacts of this LPG will be on a much larger scale and have a cumulative effect that is not addressed in this DSEIS.

2. Especially because of the history of fires and explosions in other large-scale LPG facilities elsewhere, with large-scale damage, injuries and/or deaths, which are not rare events, but are more common, I think it's crucial for the DEC to require a thorough risk assessment study by a skilled and reputable entity that has no direct or indirect connection with the gas or petroleum industry or any other businesses or agencies/entities that would benefit from this LPG facility/hub. As the DSEIS stands, it does not meet my needs for actions to ensure the safety of the people, lands, waters and other life forms that would or could be endangered by such fires or explosions.

This risk assessment needs to address every aspect of the LPG proposal, including the condition of every part of the railroad tracks, trestles and other elements of railroad involved; risk of fires and explosions from traffic accidents on roads as well as for trains (accidental derailments, etc.), risks of the 14 acre brine "pond" contaminating Seneca Lake or other waters (aquifers, streams, roadside ditches, etc.), and all else that will or can be affected by this LPG facility.

3. The age and conditions of all parts of the railroad system that the trains carrying liquid gas will use need to be studied thoroughly and every part that is not currently strong, working properly and considered to be in excellent condition, in my opinion, needs to be required to be in top-notch condition before any LPG activities can be begun. This concern is not addressed in the DSEIS as far as I can tell.

4. Of great importance to me as well is the plan to make a 14 acre "pond" for brine, which will sit on the hillside above Seneca Lake. The DSEIS's lack of any serious consideration of the dangers of siting a huge pit of toxic substance above a drinking water source, a lake that contains many forms of life (insects, fish, amphibians, algae, other plants, birds, etc.) which is a natural and ancient habitat in and of itself, and place of enjoyment, beauty, refreshment, and recreation for so many people of all ages is a serious lack in this report. When Inergy people, their supporters or anyone in the state government assert or imply that "there's nothing to worry about - the liners won't leak, and there won't be any spills or contamination", all I can do is say, "You have to be kidding!" about what sounds like tragic denials to me.

The realities of this world include increasing frequency and intensity of weather events that increasingly
destroy humanly constructed things (from buildings to farms), people and other forms of life and elements of the land, like woodlands. I cannot take anyone or any report seriously who believes, asserts or implies that there will be no more massive flooding in the years ahead, sooner or later, or damaging winds like we had last year near my home where some homes and buildings were destroyed or seriously damaged and someone I know's woodlands were leveled rapidly the night the tornado struck a 5 mile long area south of Ithaca. How can anyone get me to believe that a huge 14 acre containment of toxic brine will not eventually spill through flooding or breakage from weather events or even some other human-related event, like a vehicle accident or human error as brine is moved around? What liner exists that is not eventually going to age, crack and then leak toxic brine into the soil, eventually reaching water sources? How will any leak, spillage or flooding not end up in either Seneca Lake down the hillside or water that leads into the lake or results in damages to land and life forms within and/or beyond its own boundaries? And if Inergy says to not worry, because they'll periodically empty the brine pit to put in new liners, how can I rely on any corporation or huge business to take every precaution in a timely way for the rest of the facility's existence? Doing so is completely unrealistic, considering the history of deliberate, money-saving (to them, but not us citizens) or accidental corporate omissions of thorough care for preventing pollution, damages and other harmful effects to citizens and other parts of the landscape and web of life many of us hold as precious, and which people are unable to replace or recreate ourselves.

When, not if, Seneca Lake or other smaller waters are polluted by LPG, who can remove the toxics from the water? I think that the answer is No one can.

So, please deny Inergy permission to begin any steps to develop this LPG facility/transportation hub, because the DSEIS lacks vitally important studies and consideration of important issues/impacts. The current DSEIS doesn't adequately consider concerns of human and environmental safety and well-being for the long-term nor the actual larger-scale plans of Inergy, which need a thorough DSEIS of its own. Either do one that is thorough, including the neutrally done risk assessment analysis, or scrap the whole project.

Sincerely,
Becca Harber
From: John Ghidiu <jrghidiu@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 7:49 PM

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

Dear Mr. Bimber,

I live in Torrey, and operate my business, Organizational Development Systems, LLC from my home. An expansion of the existing propane facility will not only increase traffic on route 14, it will also pose an unacceptable threat to the community on two fronts:

I draw water from Seneca Lake, and use the lake for recreational purposes. At present, it is already one of the most challenged lakes in the area; the ecosystem is fragile, and any additional contamination due to increased industrialization poses a threat to the lake. Contaminated wastewater will only add to the risk of further pollution. Any runoff, leakage or other forms of industrial waste entering the lake will further contaminate an already fragile body of water. The lake water around the Keuka trail is already non-potable due to runoff from Penn Yan, and the sewer treatment facility. May residents on Perry Point Road already are forced to bring in bottled water. We don't need additional contaminants entering the lake.

Additionally, the storage and transportation of propane gas is a high risk, industrial activity that doesn't fit in this area - this area is supported by tourism, agriculture and wineries. These business will all suffer due to the increased transportation requirements. I know that the gas industry says there are safety mechanisms built into the transport of propane, but in spite of all the safety requirements, a propane carrying train was derailed in Syracuse this past weekend. While no one was hurt, many people were forced to evacuate, and traffic was re-routed and heavily congested while crews righted the derailed train cars. It could have been a horrific accident had the gas leaked out, which might have happened under just slightly different conditions. We were lucky this time. No matter how many safety regulations are put in place, accidents happen. We don't need this accident waiting to happen in the Finger Lakes area.

This facility is a short term solution to long term problems. Economics of energy and finance will work themselves out without this facility and the risks it poses. Long term environmental, traffic and local business impacts will take decades to be repaired. It's a poor trade off.

John Ghidiu
1207 Anthony Beach Rd.
Penn Yan, NY 14527
From: RICH PORTER <qbic33@gmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 11:11 PM
Subject: Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

339 Bedford Ave, Brooklyn, NY
Nov. 14, 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 visitor and lover of the Finger Lakes region, I am opposed to the plan to turn the area surrounding the southwestern end of Seneca Lake into a Liquid Petroleum Gas Storage and Transportation Facility, as proposed by Inergy. Such a facility will threaten the health of the drinking water. It will be ugly and noisy. It will bring heavy truck and rail traffic that is dangerous and a nuisance, and overwhelming on the small highway and rail infrastructure. It will threaten the health of the lake as a habitat and as a place of recreation. It will bring risk of environmental disaster.

All of these threats have the potential to destroy all of the things that bring me to Seneca Lake – the landscape, both natural and agricultural, the lake recreation, the wineries, the peacefulness, the bucolic lifestyle and the community itself. How sad that would be, for me as a tourist and for all the people who make a life there.

I ask that you please require Inergy to pay for an independent quantitative risk assessment on their proposed LPG Storage and Transportation Facility before considering granting them the necessary permits.

Thank you for your consideration.

Best regards,

Richard Porter
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.

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?

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. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

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?

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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.

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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?
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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?

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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.

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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,
Dear David,

I am your neighbor in Lima and I wrote to you during the prior comment period; my comments were entirely original and posed passionate doubts about the safety of the Inergy plan and doubts about the likelihood that Inergy employees would be devoted enough to assure compliance and to possess "above and beyond levels of personal conviction" that I feel are needed in a high risk endeavor such as this. I trust you received my comments and read them.

Today, I took the opportunity to read this "sample letter" which I found quite informative - much more so than the Inergy proposal which I read in part prior to my last letter to you, and I will add a few comments stirred by these points.

Noise pollution can be far reaching. I can tell you that I'd much rather hear a fish slap down on the lake in the midst of the natural quiet, than in competition with a backdrop of rumbling tanker trucks, rail cars, or drilling machines. It might seem exaggerated that such noises could travel - but they do. When the Glen Races are on, we hear the cars rev and roar in conjunction with their straight away acceleration, and their slower cornering, as if we were sitting in the stands. Our cottage is at least 10 miles from Watkins Glen and the sound is shunted right up the lake to our dock. This is part of the occasional tourist charm of the area - but a steady throb and thrum of many heavy trucks, or drilling mechanisms, is definitely intrusive and unwelcome.

There are so many obvious oversights in this plan - each brushed away by Inergy as:
- insignificant risks (no risk of leaks, no risk of contamination, no risk of pollution, no risk of explosion),
- scientifically unjust (Inergy system designs will offer sufficient protection),
- below a meaningful threshold (wetland protection not required),
- economic impact (Inergy promises economic benefit, dismisses negatives)

This reminds me of your good neighbor, the town of Lima. Do you remember when Walmart decided to build a store on Rt. 15A just north of town? There was a bare field on the east side opposite their commercial district, and a hungry farmer was hoping to sell his land. During one town meeting, Walmart's engineer tried to tell a large audience that the scrub trees in the hedgerow on the field border, would completely shut out the intrusion of the 24 hour lighting in their parking lot. I knew...
differently - that I'd never see another twilight sky again without the light pollution taking away my view of the stars - 8 miles away. It was so implausible that the crowd laughed out loud. Well, Lima, against all odds, beat Walmart without a legal battle. We made them feel so unwelcome, that they went and found another town without a town comprehensive plan - a town who was less organized and had far fewer citizens to raise objections. Walmart had no real justification for choosing Lima - half way between three large stores - they just are accustomed to moving in, grabbing tax incentives, ruining a community with the influx of crime and increased traffic, and after 10 years, often dumping their store and pulling out, leaving an abandoned shell and a huge paved lot after they discover the economy can't support them and their tax incentives are depleted. It's corporate greed motivating their actions and it causes them to prosper and not the community. They underpay, short fill hours, keep everyone part time and thus ineligible for benefits.

I am reminding you of this story because I feel like Inergy is on the same par as Walmart - it is motivated by corporate incentives for economic benefits that increase their wealth, their bottom line, and they have the big bucks for legal defense and the big bucks for fancy engineer double talk that looks good on paper but falls far short in reality. They have not shown evidence of good faith and worked with the substantial concerns forecast by opponents to their plan. They have not modified plans to be truly safe, but to be minimal compromises. Once Inergy reaps their profits - at the expense of the serenity of the Finger Lakes, after they ruin the purity of the water, decrease the safety of my town and Watkins Glen and other neighboring towns, destroy habitat, create noise pollution, drive down property values, drive away tourism, and all the other unfortunate likely things which common sense is screaming will happen - Inergy will be like Walmart. Inergy will find it unreasonable to sustain their location on Seneca Lake and they will withdraw, leaving a trail of unrepairable damage in their wake and stains of toxins and pollution which can not ever be cleaned up. As a consequence, they may also carry a debt for their errors but no financial penalty will be big enough to repair the losses their corporation will provoke - and I am sure they know their threshold for profit and loss and they know exactly how many millions they can afford to be sued and still have this be a very viable financial endeavor. They have very deep pockets and they are willing to push hard to get what they want. Obviously they want this very badly, so that alone should make any sensible person suspicious.

My property value at 3466 Lake St, Hector NY is certainly damaged by Inergy's pending DEC permit. I have a lake parcel I am putting on the market and I have seen a 20% drop in the price I've been encouraged to list it for since the appraisal in 2009. If the lake is spouting fire, I doubt I'll get a red cent for it, nor would I choose to eat the trout or the catfish if the LPG facility is approved.

Please work diligently to delay this project and request multiple safety and risk surveys be satisfied by Inergy, as well as wildlife habitat protection plans. Hopefully
they will either fail to assure sufficient safety and will be dismissed, or they will, like in the rare case of Lima vs. Walmart, give up and go away.

Very sincerely,
Suzanne Manchester

---------- Forwarded message ----------
From: GAS FREE SENeca <gasfreeseneca@gmail.com>
Date: Tue, Nov 8, 2011 at 12:00 PM
Subject: Last chance for written comments - Due by Nov. 14th
To:

Dear Finger Lakes Neighbors,

We have until this coming Monday, November 14th to submit written comments to the DEC about the dSEIS for Inergy, LP's gas storage and transportation hub proposed for the Finger Lakes region. If you can personalize your letter by commenting on how this industry will impact your business, your property values, or your way of life, that would be great. Feel free to email the sample letter below to: dlbimber@gw.dec.state.ny.us

If you plan to mail your comments, please do so by this Thursday since Friday is a holiday.

Thank you!
GAS FREE SENeca

(Sample letter below)

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.

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?

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. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

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?

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Inergy's "proprietary claims."

The next logical steps:

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.

In addition, it is imperative that a balancing test be performed to weigh both the potential growth inducing aspects of the Inergy proposal versus the impact this industry will have on the existing community character and the potentially negative economic impact it will have on the tourism, wineries, and agriculture in the region in addition to the potential negative impact on property values and hence the tax base in the region. This too should be performed by an expert chosen by the residents within the community and paid for by Inergy.

Thank you for considering my concerns and suggestions.

Sincerely,

Suzanne Manchester, LMT

Special Touch Massage Therapy
www.SpecialTMT.com

Porter Family Cottage available for rent:
www.SenecaCottage.com
David Bimber - Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY

From: Neil Fazzari <nfazz@htva.net>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 11:19 PM
Subject: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY

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

Dear Mr. Bimber,

As a resident and lover of the Finger Lakes region, I am opposed to the plan to turn the area surrounding the southwestern end of Seneca Lake into a Liquid Petroleum Gas Storage and Transportation Facility, as proposed by Inergy. Such a facility will threaten the health of the drinking water. It will be ugly and noisy. It will bring heavy truck and rail traffic that is dangerous and a nuisance, and overwhelming on the small highway and rail infrastructure. It will threaten the health of the lake as a habitat and as a place of recreation. It will bring risk of environmental disaster.

All of these threats have the potential to destroy all of the things that brought me to Seneca Lake – the landscape, both natural and agricultural, the lake recreation, the wineries, the peacefulness, the bucolic lifestyle and the community itself. How sad that would be, for me and for all the people who make a life here.

I ask that you please require Inergy to pay for an independent quantitative risk assessment on their proposed LPG Storage and Transportation Facility before considering granting them the necessary permits.

Thank you for your consideration.

Best regards,

Neil Fazzari
PO Box 231
Hector, NY 14841
From: Neil Fazzari <nfazz@htva.net>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 11:14 PM
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David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

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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,

Neil Fazzari
PO Box 231
Hector, NY 14841
To: David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Date: 11/14/2011 3:11 PM
Subject: Opposition to Finger Lakes LPG Proposal in Reading, NY

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

Dear Mr. Bimber:

I am strongly opposed to the proposed storage of LPG in salt mines in Reading, NY. I grew up in Watkins Glen, but have lived in Oswego, NY for the last 21 years. Please hear my story. While taking my children to visit relatives in WG on 11/11/11, I noticed two things that were different from all of my past trips. First, I was overwhelmed with hundreds of NO LPG signs along Route 414. Second, I noticed a higher percentage of properties for sale along the lake. Clearly a strong opposition to LPG, I was determined to find out what it was. I couldn't help but wonder if the large quantity of properties for sale was related to the LPG issue.

Once our visiting began, it didn't take long to get educated about Inergy's proposal and how strong the local opposition is to it. I was amazed how quickly this whole plan had developed. I had heard nothing of such a plan during my short Christmas visit in December, 2010. It seems that a short timetable would minimize the resistance that developers would surely face.

My fiancé and I had been recently planning on purchasing retirement property in the Seneca Lake region. After reading Inergy's plan, we wouldn't even consider it. In fact, we would no longer rent the cottage for a week in the summer on the west side of the lake near Watkins Glen. Nor would we take a dinner cruise on the lake. Nor would we take our children boating on the lake. Nor would we visit the wineries along the lake. In fact, we wouldn't come at all! And neither will a lot of other visitors, tourists, fishermen, etc. If this project develops, it will KILL the region. The people of this natural, beautiful, world renowned area have worked very hard over the last 20+ years to build the tourist industry that they presently have.

I am absolutely astounded that ANYONE would consider this area appropriate for such a site. Clearly, the benefits do not outweigh the risks. As a high school educator for 20 years, I always teach my students to do what's right. The politicians and representatives of this area should do the same. They should take a stand against this proposal for all of the health, safety, environmental, and economic reasons clearly expressed. They should listen to the local people and their conscience and do everything in their power to stop hydro fracking and shut the LPG proposal down. The negative effects on this community would undoubtedly be devastating.

The profit motive of Inergy and their "associates" is the only real reason this proposal is being considered. I plead for you to seriously consider my concerns and those of the thousands of others who will be negatively affected if the LPG proposal becomes a reality.

Thank you for your consideration.

Respectfully,

Carol Taormina
November 14, 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,

The Finger Lakes, LLC LPG Underground Storage Facility will contribute to significant negative environmental and economic impacts. These impacts have not been sufficiently addressed in the DSEIS. The environmental impact statement authored by Inergy is inadequate for several reasons. The DSEIS does not assess impacts associated with anticipated increased natural gas storage in addition to LPG storage, raising segmentation issues. The DSEIS does not adequately address impacts on endangered or threatened species and migratory birds; impacts on waterbodies, wetlands and groundwater; the economic impacts on the local wine, grape, and associated tourist industry, the increase in associated road maintenance costs and the complete lack of a spill prevention and reaction plan. The DSEIS also fails to consider viable alternatives to an open-air brine storage pit and fails to consider a no action alternative, as required under SEQR. For these reasons, this DSEIS is inadequate and Inergy’s application should be denied.

Segmentation
The SEQR handbook states that “segmentation is defined as the division of the environmental review of an action so that various activities or stages are addressed as though they were independent, unrelated activities needing individual determinations of significance. Except in special circumstances, considering only a part, or segment, of an overall action is contrary to the intent of SEQR.”

Inergy states on its website that the U.S. Salt Gas Storage facility has a development potential “of up to approximatley [sic] 10 bcf of natural gas storage capacity.” Inergy continues that the “US Salt production company has solution-mined salt caverns available for additional storage development.” Further, in Inergy’s 2010 Annual Report, Inergy states [i]n addition to the 5 million barrel Finger Lakes LPG storage expansion

that we are currently developing, there is also existing cavern space that we intend to convert to approximately 10 bcf of natural gas storage. With each new brine well that we drill we create additional potential storage capacity. For more information on our reportable business segments, see Note 14 to our consolidated financial statements.”

Inergy’s stated natural gas storage expansion plans should be assessed along with the proposed LPG storage facility. The SEQR handbook states “[s]egmentation is contrary to the intent of SEQR. The decision to segment a review is at the discretion of the lead agency. The decision to segment a review must be supported by documentation that justifies the decision and must demonstrates [sic] that such a review will be no less protective of the environment.”

Species
The effect on the threatened plant Leedy’s Roseroot has not been thoroughly addressed. This extremely rare cliffside-dwelling plant is easily dislodged by surface runoff from disturbed lands, from the cutting of uphill trees and clearance of vegetation. The effects of this storage project on Leedy’s Roseroot have not been thoroughly addressed.

The impact on migratory birds was not studied at all for Inergy’s environmental impact statement (EIS). Migratory bird season coincides with the time of year when the fourteen-acre open-air brine storage pit will be at its fullest, which will confuse migrating birds into settling into highly concentrated salt water.

There are over 190 species listed as endangered, rare or threatened by NY state that are found in the area, however, the impacts on any of these species was neither studied nor mentioned by Inergy.

Waterbodies, Wetlands and Groundwater
The impact on the wetland located on the project site has not been examined. Additionally, a thorough examination of possible groundwater pollution in the event of a breach or leak was never conducted, despite the fact that the groundwater is a mere 1.3 feet from the surface of the project site.

Inergy’s impact statement quickly dismisses the need for a study of impacts on fisheries and waterbodies by concluding that there will be no impact. At the least, the issue of runoff into Seneca Lake must be addressed.

Brine Pit


Inergy recognizes that some areas under the storage pit consist of “unstable subgrade soils” but mitigation of this issue is not addressed. The same is true for the fact that the pit will be on a downward slope.

The calculations of peak gusts, maximum rainfall and maximum wave height in the storage pit are insufficient. There is a mere 36” from the predicted fall fill line of the open pit to the top of the embankment. Inergy’s report states that a maximum rainfall of 10” was assumed and a maximum wave height (based on average peak wind gusts) of 20” was assumed. This leaves only 6” for error. Inergy’s report states the unlikely chance of high rainfall but then goes on to state in the “Brine Pond Failure” section that the Northeast is known for heavy rainfall and this would help dilute any sodium that escapes. In this respect, Inergy’s EIS directly contradicts itself.

Inergy’s EIS states that the pit will be monitored daily during heavy rainfall. This is inadequate as hourly monitoring is necessary. Such monitoring should be conducted during periods of heavy snowfall, high winds and during spring runoff as well.

Additionally, when the brine pit failed initial wind testing (to determine whether wind uplift was an issue,) Inergy determined that sand filled tubes would be used to weigh down the liners to prevent uplift. No further studies were conducted to determine whether these sand filled tubes would remedy the problem.

Inergy’s statement discusses what may happen in the event of a leak in the brine pit, the issue of a breach (or berm failure) is never discussed.

**Alternatives**

The SEQR Handbook states “The "no action" alternative must always be discussed to provide a baseline for evaluation of impacts and comparisons of other impacts.” There is no discussion of a no-action alternative in this DSEIS. Further, alternatives to the brine pit were not thoroughly explored by Inergy, as the only other alternatives evaluated were other open-air brine storage pits in various locations on the project site.

**Economic Impact**

The economic impact on the tourist industry was not fully evaluated in Inergy’s EIS. The visual impact of a large flarestack, 5,000 gallon concrete holding tank, 27 acre wide and 51 foot tall brine storage containment area has not been assessed in these terms. Further, the impact on roadways in the area (including increased traffic and increased maintenance due to wear and tear) has not been fully addressed by Inergy. Both increased congestion and noise pollution from trucks must be addressed. Noise pollution from increased train transportation must also be addressed, including its effects on local parks, visitors to the area, and residents. The Finger Lakes is recognized as a “world class wine region” and the storage of millions of gallons of LPG and billions of cubic feet of natural gas has the potential to have significant detrimental impacts on this region’s economy and those impacts are not assessed in this DSEIS. A socioeconomic impacts

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analysis should be conducted and included as a supplement to this DSEIS. Without it, any decision to permit this facility is arbitrary and capricious.

Soils
The soil in the project area is poorly drained in some areas and the effect of runoff from the project site has not been thoroughly addressed.

Prevention & Reaction
No formal plan for prevention of spills and other accidents was submitted. No formal plan for reaction and clean up to such an event was submitted. Inergy states that they “intend to” have them in place.

Additionally, there has been no assessment of what would be done in the event that both geomembrane liners leaked. There is no mention of when, if ever, the pit would be drained and evaluated for such leaks. This must be done periodically to ensure the integrity of the liners.

Related to this issue is the fact that no study was conducted to discover the source of the sulfurous odor coming out of a well during construction. This was merely written off by Inergy as “common” and does not bode well for the company’s policies relating to environmental health and safety standards.

Seismic Events
No studies were conducted or statements made on the effect of a seismic event on or near the project site. This is particularly important because there have been five such events in the area since 2001 alone. The frequency and intensity of seismic events may increase due to the nature of underground storage in salt caverns and its effects on faults, and the onslaught of hydraulic fracturing, a practice expected to begin in this area.

Conclusion
This DSEIS fails to address significant environmental, safety, economic, and community impacts of the LPG facility outlined in this comment. The DSEIS has also failed to address Inergy’s planned natural gas storage expansion listed by Inergy on its website, its SEC filings and its Annual Report. This DSEIS is inadequate and I respectfully request that the Department of Environmental Conservation reject this DSEIS as inadequate and deny Inergy application for an underground storage permit.

Sincerely,

Beren Argetsinger
From: Robert Warfield <rmw6@cornell.edu>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 4:03 PM
Subject: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Robert Warfield
Prospect St, 1M

Ithaca, NY 14850

November 14, 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,

I attended both public comment events held in Watkins Glen for Inergy LP's plan to build a propane storage facility in the town of Reading. During the September 27th event, in the brief initial presentation by Inergy, the executive stated that the company's emergency management plan would not be available for public review until after the project is approved. I find this to be utterly unacceptable.

If there is any chance of any type of failure of the storage facility, it is critical that a comprehensive emergency management response plan is in place. In the recent past the country has been witness to the catastrophic failure of the Deepwater Horizon well in the Gulf of Mexico. On an almost weekly basis BP and the government touted yet another solution to stop the oil. As the months dragged on it became clear that they did not have a plan, certainly not a comprehensive set of contingency plans formulated in advance and they were essentially making it up as the event unfolded. News organizations reviewed the minimal plan that BP did file with their permit application and found it to be full of boiler plate language. It even contained strategies for protecting types of animals that do not live in the Gulf of Mexico. How are the citizens of New York to know if Inergy's plan is similarly flawed if we have no opportunity to review it?

There are many reasons to be concerned about the lack of plan review. Surely specialized equipment is required to handle some of the potential accidents which may occur. I doubt that our local fire departments have such equipment. So who will purchase the needed safety equipment? The answer better not be the local taxpayers. What about specialized training for local emergency responders? Coordination of the different
agencies involved? I do not claim to be an expert in emergency preparedness, but I am not willing to trust that Inergy has attended to these issues and the many others which could be raised.

Inergy also stated at the September 27th event that railroad track maintenance and inspection is not their responsibility. While this is true, it also suggests that no additional inspection and maintenance will be done to the track before it is used to carry large amounts of propane and possibly natural gas. Just because Inergy does not own the track does not mean that the track condition should not factor into the dSEIS. It is because of Inergy's proposal that the community will be exposed to the increased risk of transportation accidents. Therefore the onus of insuring safe transportation of the gas should be on Inergy regardless of what entity technically owns the track.

Another safety issue which concerns me is the maintenance of the pipelines that will connect the site to the country's gas infrastructure. In recent years there have been a number of pipeline explosions including one of BP's in Alaska. I believe people have been injured and killed in these incidents. It is my understanding that many of these pipelines are maintained by third parties. That is to say not the owners or users. Clearly this arrangement creates an incentive for them to minimize the amount of maintenance they do. The lower they keep their costs, the higher their profits. I do not believe that third party pipeline maintenance is in the best interest of the public.

In addition to these safety concerns, there were a few other issues presented at the hearings which I found troubling. Inergy has stated repeatedly that their facility will decrease the cost of gas for local consumers. While it makes sense that having a large local supply of gas would help insulate gas customers in the Northeast from price fluctuations, the truth is Inergy will be making no legal commitments to ensure that any savings are passed on to consumers. The savings, if there are any, could just as easily be absorbed into the balance sheets of one or more of the companies in the gas supply chain. In fact this is the most likely scenario given the lack of legal obligations and the goal of most corporations to maximize profits. I would also like to point out that Inergy does not sell gas to consumers. They are in the storage and transportation business. So for them to trumpet consumer savings as one of the benefits of the project is incredibly misleading.

At the November 3rd event one of the Inergy employees pointedly criticized a previous speaker for noting that the gas prices which are higher in other local states (which contradicts their claim that NY has the highest prices in the US) are retail not wholesale. So is the company saying that their project will lower wholesale prices but not retail prices? I believe his point was that they have no control over the retail prices and that is exactly my point, too. NY gas customers pay retail, not wholesale, and lower wholesale prices, if they ever materialize, do us no good unless the savings are passed on to us. So it is misleading to imply that they are going to save us money on our gas bills.

Another issue which concerns me is the tax incentives being offered to attract this project to the area. While I see no reason to repeat here the many arguments that have been made which suggest that this project
will be detrimental to the local economy, there is clearly reason to be skeptical. Without a thorough analysis of the project's economics impact on the area, an analysis which proves the benefit of the project, why are tax incentives being provided? Most everything I hear suggests that the facility will be a drain on the local economy and will put a thriving tourism industry at risk. So I ask that the DEC do an economic analysis of the project's impact on the local economy. I do not know the vehicle for such an analysis, but it is clearly critical to any thorough permit approval process.

At the second Watkins Glen event Inergy boasted of the number of safety officers in their employ. If they are so sure of their ability to construct a safe facility, why can't they present their response plan for public review? I can only think that they must have something to hide. Could it be that releasing the plan would expose the real risks the facility poses and thus galvanize public opinion against the project? Or is it that a large part of the plan depends on taxpayer funded services for which Inergy will offer no recompense? We know that the gas tanker which exploded in Roseville, Ca cost the taxpayers $500,000. A single event of that kind would wipe out the entire payment that Inergy is offering the local government.

There are many reasons to be skeptical of Inergy's presentation of the level of risk posed by this project. Chief among them is the company's refusal to be transparent with their emergency management plan. This suggests that the risks are much greater than what have been presented to the public. Recent history has a number of examples of pipeline, tanker and storage facility explosions. So we know accidents do happen and people can be hurt or killed. Leachate from the dump in Seneca county is leaking into Seneca Lake. So we know liners can leak and that the brine pond can not be guaranteed to never leak. We know earthquakes and hurricanes can strike in this area. The former residents of Fukushima, Japan, those of them still alive, can tell us of the danger that natural events pose to man-made energy facilities. Some of the railroad overpasses which would carry the gas trains are currently crumbling (see the one over Route 329). Bridge collapses have also been in the news lately (e.g. the one over the Mississippi in Minnesota, for example).

I make no claim to expertise about any of the technical aspects of this project. However as a concerned and informed citizen, I am aware that accidents can and do happen at facilities similar to this one. Given that the real risk profile of this project is very different from the one presented by Inergy, I request that the DEC mandate that Inergy file a comprehensive emergency response plan as part of their permit application and that their plan is available for public comment and review for at least 90 days prior to any decision on the permit. It would be foolhardy not to require this. As Ronald Reagan used to say, "Trust, but verify". I for one am not willing to blindly trust Inergy's expertise given all the known risks of their project, much less the unknown ones.

It is the DEC's responsibility to act independently of corporate pressures and to represent the citizens of this state. The public comments received by the DEC need to be addressed by the agency independently, not in collaboration with Inergy as the administrative
judge at the 9/27/11 meeting suggested would be done.

In closing I ask that the agency makes this decision based upon the need to protect the public from the externalized risks created by this project. Inergy must be required to file a comprehensive emergency management plan with its permit application and the public, which will inevitably bear the increased risks created by the project, must have the right to review that plan.

Respectfully,
Robert Warfield
Dear Mr. Bimber,


Rachel Treichler
7988 Van Amburg Road
Hammondsport, NY 14840
607-569-2114
November 14, 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


Dear Mr. Bimber,

I offer the following comments on the Draft Supplemental Environmental Impact Statement on the Finger Lakes LPG Storage Facility (the DSEIS) accepted for public review by the New York State Department of Environmental Conservation (DEC or Department) in August 2011.

According to the DSEIS, the developer, Finger Lakes LPG Storage, LLC, proposes to construct a multi-cycle Liquid Petroleum Gas (LPG) underground salt cavern storage system with a 27 acre surface brine storage facility and a major pipeline connection and rail and truck load/unload racks adjacent to Seneca Lake in the Town of Reading, Schuyler County, on two properties owned by the developer and its affiliate, US Salt, LLC.

My review of the DSEIS indicates that it fails to adequately analyze the risks presented by earthquake hazards to the integrity of the brine storage area and the underground storage caverns and fails to adequately analyze the risks presented by the proximity of the above ground brine storage area and the underground storage caverns to Seneca Lake.

Specifically, the DSEIS contains the following deficiencies:

1. Fails to address the presence of faults in the area of the project and to analyze the seismicity of these faults,
2. Fails to consider much significant research on seismicity in the area,
3. Fails to consider the impact that high volume hydraulic fracturing of thousands of gas wells in the vicinity could have on seismicity in the area,
4. Fails to address the possible impacts on Seneca Lake that could result from a loss of underground storage cavern integrity caused by an earthquake,
5. Fails to address the possible impacts on Seneca Lake that could result from damage to the integrity of the brine storage facility caused by an earthquake,
6. Fails to address the possibility of LPG explosions that could result from a loss of underground storage cavern integrity or from structural damage to railroad facilities caused by an earthquake, and
7. Fails to address expansion plans and the greater exposure to earthquake risks that would be presented by an expanded facility.

Seneca Lake holds half of the water volume of New York’s Finger Lakes. It is a drinking water source for 70,000 people and has several deep faults in the lake and adjacent to it. When a pressurized petroleum storage project is proposed in such a critical location, we must ensure that the protections contained in our...
state's environmental laws are enforced. Nowhere in the DSEIS is the proximity of the proposed facility to Seneca Lake considered in evaluating the hazards presented by the project.

The consideration of possible risks of earthquake and seismic activity in the DSEIS is entirely inadequate. On the basis of a statement on page 67 of the DSEIS that “there are no risks involved at the site with earthquakes within ½ mile of any of the subject Galleries,” and that “the area continues to be a low seismicity area,” the DSEIS contains no analysis of any consequences that might result if an earthquake were to occur that damaged the integrity of either the underground storage caverns or the above ground brine storage facility.

The assumption in the DSEIS that there is no earthquake risk in the area of the project is not in accord with the ongoing research by Robert Jacobi of the University of Buffalo and his colleagues. In a 2002 paper, Basement faults and seismicity in the Appalachian Basin of New York State, Robert D. Jacobi, *Tectonophysics*, 353 (2002) pp. 75–113, Jacobi states (p. 77):

> In the late 1980s and early 1990s, several studies in nearby regions of assumed flat-lying units began to demonstrate that basement faults did exist in much greater numbers than previously suspected, and that these faults had been repeatedly reactivated.

The paper goes on to state (p. 79):

> Fundamental to establishing a relationship between seismicity and faults is to first identify which lineaments indicate faults, and then to determine to what extent a spatial relationship exists between the faults and earthquake epicenters. Evidence utilized for recognition of faults in NYS included the integration of FIDs, E97 lineaments (Fig. 2), topographic lineaments, gradients in gravity and magnetic data (Figs. 3 and 4, respectively), seismic reflection profiles, and well logs. Integration of these data sets promoted the identification of numerous faults in the study area (Fig. 5). This paper illustrates the evidence for the confirmed faults, and demonstrates the characteristics and ubiquity of the faults for western, central, and eastern NYS (Sections 2, 3, and 4, respectively). Suspected faults, those that are not confirmed by outcrop structures, well logs or seismic reflection profiles, are discussed in Appendix A. Section 5 of the paper examines the spatial distribution of seismic events in NYS in relation to the distribution of known and suspected faults.

Figure 2 from the paper, showing extensive faulting in the area of the proposed project is attached as Exhibit 1 to these comments.

The fractures along the southeastern shore of Seneca Lake were extensively analyzed by Courtney Lugert in her dissertation, “Fractures and their relation to other geological data sets along the southeastern shore of Seneca Lake, New York State: Implications for fault systems in the Appalachian Plateau,” State University of New York at Buffalo, 2005, 344 pages; AAT, http://gradworks.umi.com/14/26/1426737.html. The abstract states that the paper “demonstrates that the trends of deep faults [are] observed in proprietary seismic and regional aeromagnetic data can be recognized at the surface through an integration of fracture intensification domains (FIDs), soil gas anomalies and EarthSat (1997) lineaments. The collected fracture data include nine characteristics for over 2550 individual fractures in the Devonian Catskill Delta sediments.”

One of the most powerful earthquakes ever registered in Western or Central NY occurred in 1929. This magnitude 5.2 quake was centered in near Attica, NY—107 miles from Watkins Glen, and did extensive damage to buildings in Attica. A more distant, but ten times more powerful earthquake of magnitude 6.4, occurred in 1935 in Quebec, and was felt across New York State. And a magnitude 5.1 quake occurred in 1983, centered in the Adirondacks.

The 5.9 earthquake this past August, with its epicenter in Mineral, VA, was strong enough to damage the National Cathedral in Washington, DC, 91 miles away—only slightly closer than Attica is to Watkins Glen. The motion of this quake also shifted 25 of the huge radioactive waste storage tanks at the nearby North Anna nuclear plant. Many of us felt that quake locally.

Some important news that was not mentioned in the Finger Lakes DSEIS: One of those strike-slip fault-lines—the same kind that moved the earth in Mineral, VA this past summer—runs parallel to the west side of Seneca Lake. The fault line appears on Stone and Webster’s maps, and Jacobi’s maps, to be within a half-mile of the proposed LPG gas storage and brine pond. If the strike-slip fault parallel to Seneca Lake were to move, the results could very easily be disastrous for people of the Watkins Glen area.


The DSEIS fails to consider the impact that high volume hydraulic fracturing of hundreds or thousands of gas wells in the vicinity could have on seismicity in the area. As more and more earthquakes are being reported around the globe in areas where hydraulic fracturing is occurring, researchers are beginning to conclude that hydraulic fracturing can cause earthquakes. A recent large earthquake in Oklahoma is the subject of the latest speculation. See “Did Fracking Cause Oklahoma’s Largest Recorded Earthquake?” By Charles Q. Choi, Scientific American, November 14, 2011, http://www.scientificamerican.com/article.cfm?id=did-fracking-cause-oklahomas-largest-recorded-earthquake. The article notes that:

The recent upick in the area's temblors has been dramatic. From 1972 to 2008 only two to six earthquakes were reported per year in Oklahoma, and were often too small for people to notice. However, in 2009 nearly 50 earthquakes were recorded (pdf), and that number more than doubled in 2010 to 1,047, with 103 powerful enough to be felt.

This unusual seismicity has led some to wonder about increased activity in the area related to fracturing, or hydraulic fracturing, which uses millions of gallons of fluid to break apart rock and release natural gas. The practice generates a considerable amount of waste liquid, which is often disposed of by injecting it into deep rock formations where it can lubricate faults. Hydraulic fracturing is common in Oklahoma, the nation's third-largest producer of natural gas, and has taken place there for decades. Now, with the discovery of natural gas deposits in other regions of the U.S., the extraction method is being used more widely and has raised concerns about its potential to contaminate drinking water.

Fracking has been linked to two minor earthquakes in northwest England, very likely by lubricating an already stressed fault zone and thus making it easier for the land to shift. A report in August by seismologist Austin Holland at the OGS also suggested that a swarm
of nearly 50 small quakes of magnitude 1.0 to 2.8 near the center of the state might have been triggered by nearby fracking.

Still, researchers say it seems unlikely that fracking had anything to do with last weekend’s magnitude 5.6 quake. “There was a lot of deformation of the Earth here 300 million years ago that created huge geological structures in the subsurface that shift from time to time,” Keller says. “We have an unstable situation here, and it’s one reason why oil and gas is available here in the first place.”

If earthquake activity in New York were to increase as greatly as earthquake activity has increased in Oklahoma, the risks presented by the proposed facility would be significantly greater.

It violates the requirements of SEQRA for the DSEIS to claim that any part of the applicant’s analysis of the environmental impacts of the project is proprietary, as is stated on page 64. The Reservoir Suitability Report referred to on that page needs to be made available for consideration by the public.

The DEC needs to require the developer to prepare a revised DGEIS that adequately addresses the deficiencies outlined above so that the public can review and comment on these aspects of the project for proper compliance with SEQRA.

Respectfully yours,

Rachel Treichler
My name is Emily Rockett and I am a Cornell Law student writing on behalf of Cornell Law School’s Water Law Clinic to ask that the DEC deny Inergy’s permit application for their proposed LPG facility. I’ve spent the past several months researching legal issues related to the SEQR permitting process and have come to the conclusion that in order to comply with the environmental protection mandates of New York State Environmental Law, the DEC should deny the permit and not allow this project to continue. The potential for environmental harm that this facility poses outweighs the potential economic benefit. Furthermore, potential economic harm posed by the facility in the form of decreased tourism revenue and property value render the potential economic benefit much less significant than Inergy claims in its dSEIS. The dSEIS glosses over or ignores many of these potential harms in their impact statement. Unless the applicant can rewrite its EIS to acknowledge potential catastrophes resulting from gas explosions, brine pond leaks, increased truck and rail traffic, and problems with storage caverns and can come up with concrete mitigation plans to minimize risk to the community, this permit should be denied.1

Inergy’s dSEIS for the LPG storage facility is incomplete under the State Environmental Quality Review Act (SEQRA). SEQRA section 617.1(d) requires that Inergy incorporate a suitable balance of social, economic, and environmental factors into the planning and decision-making processes of state, regional, and local agencies. The dSEIS contains insufficient information for New York State’s Department of Environmental Conservation (DEC) to effectively weigh and balance environmental harm with social, economic, and other factors as it is required to under SEQR Regulations § 617.11(d)(2).

I. The DSEIS provides Insufficient Evidence That Inergy Would Minimize Environmental Impacts and Mitigate Risks.

SEQRA section 617.11(d) requires that DEC certify that Inergy avoid or minimize adverse environmental impacts to the maximum extent practicable, consistent with social, economic, and other essential considerations from among the reasonable alternatives available. Inergy can only accomplish this by incorporating mitigation measures, which it must discuss in the dSEIS SEQRA § 617.9(b)(5)(iv). As it stands, the risk assessment in the dSEIS is inadequate for a number of reasons. First, it fails to discuss mitigation plans for major catastrophes. Second, three components of the proposed facility have been found to pose adverse environmental impacts: (1) storage caverns; (2) above-ground storage tanks; and (3) the brine pond. Finally, Inergy does not discuss known risks in the dSEIS. Accordingly, DEC cannot allow the application to move forward.

A. Storage Caverns

The British Geological Survey’s study of the risks inherent in underground gas storage found that

[i]he range of possible release scenarios for a given component may cover a wide range of events from a pinhole leak to catastrophic pipe rupture or a failure of the storage environment (e.g. salt cavern). Such events might be due to wear and tear, subsidence, communication with other caverns or inadvertent intrusion through boreholes due to poor planning and site characterization.²

The dSEIS fails to address this range of potential disasters. Nor are there apparent mitigation plans for the full range of potential accidents. SEQRA mandates a more detailed plan. Until Inergy complies, DEC cannot finalize the dSEIS and allow the permitting process to continue.3

B. Above-Ground Storage Tanks

The site would contain five 30,000-gallon “bullet storage tanks”.4 These have been known to explode, causing massive fires. For example:

Overpressure from the pressure of the pipeline supplying the plant was the probable cause of the rupture of an 8-inch line between a sphere and a series of cylinders in a Mexico City, Mexico LPG facility on November 11, 1984 (Paullin & Santman, 1985). A drop in pressure was noticed in the control room and also at a pipeline pumping station, but the operators could not identify the cause of the pressure drop. The release of LPG continued for 5–10 min when the vapor cloud drifted to a flare stack and ignited. The explosion led to a number of ground fires and explosions that destroyed the facility and killed 500 people. Four out of five accidents occurred during LPG and propane loading was caused by operational error. In a 1964 accident in Japan and a 1998 accident in Kaohsiung, Taiwan, the drivers moved the tankers inadvertently resulting in hose disconnecting, vapor release, fire and explosion. In a 1979 accident in Ypsilanti, Michigan, USA, the hose failed during tank loading.5

The dSEIS fails to discuss the possibility of major explosions, including causes of ignition, the potential for human error, and the likelihood of gas release during loading into trucks or rail cars.

Rather, the dSEIS briefly mentions “computer training”, “on the job training,” and “safety meetings.”6 This broad description indicates that Inergy has not put an appropriate amount of thought into how it will ensure the safety of the community from employee error and from the truck and rail carriers who would distribute a hazardous product across the Northeast.

3 N.Y. Comp. Codes R. & Regs. tit. 6 § 617.3(g)(2) (1996)
4 Draft EIS at 9.
6 Draft EIS at 84.
The applicant notes that Norfolk Southern Railroad, the rail carrier in charge of transporting product from the facility has not been involved in any accidents that have resulted in a release of hazardous materials. But the list of what Norfolk Southern transports includes nothing that is as hazardous as large quantities of LPG. Inergy must provide information on Norfolk Southern's overall safety record, which it has failed to do.

C. Brine Pond

There are two problems with the brine pond. First is the negative aesthetic impact it will have on the surrounding area. Inergy mentions a 91.98 million-gallon brine pond, which would cover 13 acres. There is a secondary problem here with potential segmentation. It is unclear why 91.98 million gallons are necessary if the facility needs to displace a maximum of 2.1 million gallons of LPG. A brine pond of this size would be particularly damaging from a community character standpoint because it requires destroying forested area and agricultural land. Inergy must provide more information so that DEC can determine whether this is the least intrusive way to store the proposed amount of product.

Secondly, there is the potential for leaks and significant damage resulting from leakage. Inergy mentions the possibility of leaks but does not explain how it will identify holes in the membrane of the brine pond. Further, the dSEIS does not give the capacity of U.S. Salt’s brine pond, which is the backup storage vessel in case of a major leak at the proposed facility. It must be large enough so that if a hole occurs in the bottom of the membrane, all 91.98 million gallons of brine can be transferred there. Inergy acknowledges that a brine spill would likely be deadly.

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7 Id. at 130.
8 Id. at 10.
9 Id.
10 Id.
to freshwater fish.\textsuperscript{11} It suggests, however, that the impact on the lake would be minimal because of the ‘mixing’ that takes place. A study by the Finger Lakes Institute contradicts this claim:

\begin{quote}
\text{[T]he lake responds slowly to pollutant threats and also remediation and other protection efforts. The complete response typically takes 5 to 10 residence times for conservative (nonreactive) materials. Thus, Seneca Lake is a critical resource for the region and should be protected now if water quality threats exist, because once stressed or perturbed, it will take a generation or more to restore the lake back to its less stressed state.}\textsuperscript{12}
\end{quote}

Because Inergy provides no suggestions as to how to minimize the impact on wildlife, the dSEIS is lacking a key component and cannot be deemed complete.\textsuperscript{13}

Inergy acknowledges the existence of threatened species—Leedy’s Roseroot—near the project site.\textsuperscript{14} It notes that since the project will not affect cliffside habitats, no further action or explanation of potential harmful effects nor plan to mitigate those effects is required. But if there were an explosion or a brine spill, this would pose significant harm to the threatened plant. The dSEIS completely fails to consider these risks. Moreover, Inergy does not consider the effect of increased traffic on the plant’s habitat. Inergy must provide an assessment of how the increased truck and rail traffic will affect local plant and animal species.

The dSEIS acknowledges that Seneca Lake is an area of waterfowl concentration.\textsuperscript{15} Simply because there are no endangered or threatened species “in the area of the project,”\textsuperscript{16} this does not mean that the project will have no effect on endangered or threatened species.\textsuperscript{17} If a project is “mammoth” in size or has obvious destructive potential, the applicant must take a

\begin{flushleft}
\textsuperscript{11} \textit{Id.} at 101.
\textsuperscript{13} \textit{N.Y. COMP. CODES R. & REGS. tit. 6 § 617.9(b)(iv) (1996).}
\textsuperscript{14} \textit{Id.} at 28.
\textsuperscript{15} \textit{Id.} at 29.
\textsuperscript{16} \textit{Id.} at 29
\end{flushleft}
“hard look” at likely effects of the proposed development. With the minimal information that the dSEIS provides, it is very difficult for the DEC to effectively take a hard look at the effects on area wildlife.

Furthermore, the dSEIS cannot discount species that are not yet in danger without justification. Indeed, if effects outside of the project area were discounted from an EIS, there would be little purpose in implementing the SEQRA process at all. The dSEIS’s Wildlife Section acknowledges that the project would disturb wildlife but neither explains in what ways nor provides consideration of any alternatives. Rather, it lists a variety of birds, mice, voles, squirrels, and a variety of native plants. There is no discussion of what exactly will happen to the habitats of these creatures.

II. The DSEIS Fails to Adequately Address Segmentation.

The dSEIS discusses the safety of the two caverns for storage of 2.1 million barrels of LPG. However, Inergy’s website claims that the Watkins Glen facility will contain an initial 2.1 million barrels of LPG storage. The word ‘initial’ indicates that the stated capacity is not the eventual plan. If Inergy plans to increase the storage capacity at the facility, it is improperly segmenting that portion of the project. Inergy must include likely further development in the current dSEIS.

Furthermore, Inergy has already drilled stratigraphic test wells on site. Thus, Inergy has already completed most of the physical work for adding storage wells. But the dSEIS indicates

\[18 \text{ Id.}
\[19 \text{ See Id.}
\[20 \text{ dSEIS at 25}
\[21 \text{ Id. at 70–71.}
\[23 \text{ See N.Y. COMP. CODES R. & REGS tit. § 617.3(g)(1) (1996).}
nothing about further storage plans. The more gas stored on site, the greater the magnitude of leaks or explosions should the safety of the wells be compromised. DEC cannot undertake a thorough analysis without knowing the full extent of the plans for this facility. Based on a comparison of the dSEIS the initial public offering (IPO), it does not. The IPO suggests that Inergy wants to make Watkins Glen a “hub” of gas transportation in the Northeast by means of “pipeline projects.” Without knowing the true extend of the project, DEC cannot accurately assess the environmental impact of Inergy’s development plans.

III. DEC Must Deny the Permit Because of the Environmental Risks of the Facility.

Inergy’s proposed LPG facility pose significant environmental risks to Seneca Lake and the surrounding area. Inergy has failed to adequately detail these risks and the requisite mitigation measures in the current dSEIS. Rather, Inergy has based its assessments on incomplete information and has disregarded serious risks by putting a facility of this size and nature into a small lakeside town. The dSEIS discusses a Hazard and Operability Study (HAZOPS) that Inergy will conduct in the future to assess the likelihood of catastrophic accidents. Since the purpose of a dSEIS is to conduct a thorough assessment of the potential environmental impacts of a proposed facility, Inergy must complete the HAZOPS prior to issuing the dSEIS. To provide an adequate assessment of the potential risks to Seneca Lake and the surrounding towns and villages, the dSEIS must evaluate the probability and potential magnitude of an accident. Inergy states that it “will have an accidental response plan.” The lack of a response plan in the application itself poses a threat to the safety of the community.

25 Draft EIS at 151.
27 Draft EIS at 166.
Once the permit is complete, it is not clear how DEC or the community can require a response plan. Because Inergy’s application lacks an adequate assessment of the project’s risks and associated mitigation, DEC must deny this permit.


The faulting analysis is incomplete. Inergy cites past studies (Jacoby in 1973 and Jacoby and Dellwig in 1974) that found faulting in the area of the brine pond. Seismic activity could still affect the caverns even though faulting is not in the containing shale. Karen Edelstein brought up at the public hearing, please see her comment for more detail. Inergy must take into consideration the potential for seismic impacts for more than a half-mile radius around the proposed facility. Further, studies exploring the possibility of storing nuclear waste in salt caverns concluded that such storage was not safe. Inergy must explain why flammable gases are safe to store in the caverns.

B. Inergy Inadequately Assessed the Environmental Risks of the Brine Pond.

Inergy acknowledges that brine spills “will almost always kill vegetation and sterilize the soil,” but claims that this is not a potential catastrophe because the “plant toxicity is short lived due to the northeast’s high rainfall.” This statement requires further supporting study and is inadequate in its current form.

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28 See id. at 73–75.
29 See id. at 73.
30 Karen Edelstein’s presentation at the public hearing, Sep 27, 2011 noted that effects of an earthquake centered in Virginia were felt locally and raising the important question of what the effect of that would be on salt caverns containing flammable gases.
31 See Id.
32 Draft EIS at 90.
33 Id.
Although Inergy discusses the impact of a major brine spill, its analysis is inadequate for two reasons. First, “considerable mixing” of brine does not mean that wildlife in the lake will be safe. Second, the Mass balance model, which was used to predict concentrations of sodium and chloride in the lake as a result of an instantaneous spill of 80 million gallons of brine, is not credible. The fact that Seneca is a large lake does not mean that it is immune from localized damage from a brine spill. Flushing the contaminated area with fresh water is a weak and ineffective solution if the problem is as large as Inergy claims it could be. Inergy should also explain how it can provide uncontaminated fresh water. The conclusion that the entire lake will become mixed seems unlikely. As a large body of water, Seneca Lake cannot mix quickly enough to mitigate the devastating short-term effects. As the Hobart and William Smith study cited on page 2 indicated,

[T]he lake responds slowly to pollutant threats and also remediation and other protection efforts. The complete response typically takes 5 to 10 residence times for conservative (nonreactive) materials. Thus, Seneca Lake is a critical resource for the region and should be protected now if water quality threats exist, because once stressed or perturbed, it will take a generation or more to restore the lake back to its less stressed state.

Because of the severe threat posed to the lake and the length of time required for cleanup, great care must be taken in allowing a facility with the potential to let loose millions of gallons of pollutants into Seneca Lake.

C. The DSEIS Inadequately Addresses Emergency Management Plans and the Possibility of Catastrophic Impacts.

34 Id. at 100.
36 Draft EIS at 100.
37 Draft EIS at 100.
38 See id. at 101.
39 Halfman and Franklin. Supra, Note 35.
A "catastrophic impact" is one which is life threatening to a number of individuals; would cause extreme hardship to their physical well-being; or would cause widespread destruction of natural resources as a result of a proposed action. An impact is "reasonably foreseeable" if it could occur as a result of the action, even if the probability of such an occurrence is small.\textsuperscript{40}

Inergy must identify reasonably foreseeable catastrophic impacts in the dSEIS. The discussion should include descriptions of areas, populations or resources potentially affected, a general discussion of the likelihood that the catastrophic impacts would actually occur, and a discussion of alternatives and mitigation measures intended to prevent such catastrophic impacts, including measures that have been incorporated into the proposed project design.\textsuperscript{41}

Inergy delegates all emergency response to local volunteer fire companies.\textsuperscript{42} This alone demonstrates that Inergy has not fully acknowledged the risks of constructing such a facility with the proposed amount of LPG stored on site. The bullet tanks alone pose an enormous risk. There have been several documented instances of huge explosions resulting in massive fires and extensive destruction when these tanks explode. In 2008, an explosion in Toronto occurred despite regular monitoring of the facility. Firefighters could not even enter the facility for two days, let alone contain the damage.\textsuperscript{43} Because of the potential for catastrophe, DEC must identify the full extent of Inergy's expansion plans before allowing the company to begin construction. The more propane stored in the facility, the bigger the potential catastrophe, threatening thousands of people living in and around Seneca Lake.

\textsuperscript{40} The SEQR Handbook, 3rd Edition, 2010 #48, p. 129.
\textsuperscript{41} Id.
\textsuperscript{42} Draft EIS at 157.
The dSEIS discusses Inergy’s “prompt investigation” of incidents. If a catastrophic fireball were to happen, however, Inergy would not be able to investigate until it burned out on its own. DEC should require a third party to conduct an investigation and inform the DEC of the real risks and the mitigation measures that Inergy needs to implement. Inergy must have an adequate emergency response plan in place to enable DEC to properly evaluate the environmental risks of the facility.

The Underground Injection Control (UIC) application poses some serious deficiencies as well. Evaluation of well and cavern integrity is blacked out, as is the discussion of Mechanical Integrity testing procedures. This is troubling. The permit process is designed to inform the public of the potential risks inherent in a proposed project. The public cannot adequately evaluate this proposal if it is not given full information about the safety of proposed storage areas. Inergy asserts that its project will not have a significant visual impact. However, the UIC permit application states that 26 acres of meadow or brushland, 20 acres of forest, and 21 acres of agricultural land will be turned into 20 acres of water surface area, 11 acres of roads, buildings, and other paved surfaces, and 36 acres of mowed stormwater control. This clearly constitutes a significant visual impact.

IV. DEC Must Deny the Permit Because the Environmental Impacts of the Facility Outweigh the Economic Benefits.

Inergy discusses growth-inducing aspects of the project but ignores the inevitable harm to the area’s tourism industry. Despite Inergy’s claims that there will be no significant visual impact from the facility, a flare stack, an enormous brine pond, and increased truck and rail

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44 Draft EIS at 161.
46 Draft EIS Appendix O, page 3.
47 See Draft EIS at 176.
traffic complete with the attendant noise and pollution will not induce more people to vacation at Seneca Lake. Equally damaging would be the damaging effects of air pollution on local wineries. Tourists come from all over the country every year to sample the areas wines and admire the beauty of Seneca Lake. Accordingly, the project would significantly harm community character and negatively impact the area’s economy.

This project poses significant environmental harm that Inergy cannot adequately mitigate. The increased traffic, air pollution, and environmental degradation will significantly affect towns surrounding Seneca Lake and, moreover, the entire Finger Lakes region. Placing an industrial site of this scale in the middle of wine country would be detrimental to the area’s vital tourism industry and decrease property values. The potential economic benefit from eight to ten new jobs combined with the promised savings on consumer fuel expenses from having nearby storage in the winter is not certain to exceed the potential economic loss from the tourist industries, wineries, and property values as the result of large-scale industrialization of a now rural area. While it is not legally mandated that the DEC find that the balance tips this way, it would be prudent and more in line with the DEC’s mandate under SEQRA to protect the state’s environmental resources. The DEC should therefore find the dSEIS inadequate and deny the permit for this facility.

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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 visitor and lover of the Finger Lakes region, I am opposed to the plan to turn the area surrounding the southwestern end of Seneca Lake into a Liquid Petroleum Gas Storage and Transportation Facility, as proposed by Inergy. Such a facility will threaten the health of the drinking water. It will be ugly and noisy. It will bring heavy truck and rail traffic that is dangerous and a nuisance, and overwhelming on the small highway and rail infrastructure. It will threaten the health of the lake as a habitat and as a place of recreation. It will bring risk of environmental disaster.  

All of these threats have the potential to destroy all of the things that bring me to Seneca Lake – the landscape, both natural and agricultural, the lake recreation, the wineries, the peacefulness, the bucolic lifestyle and the community itself. How sad that would be, for me as a tourist and for all the people who make a life there.  

I ask that you please require Inergy to pay for an independent quantitative risk assessment on their proposed LPG Storage and Transportation Facility before considering granting them the necessary permits.  

Thank you for your consideration.  

Best regards,  

Michael and Suzanne Staum
Po box 2036 Anacortes, Wa.
Nov. 14th 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,

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? 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?

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. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.
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.

Thank you for considering my concerns and suggestions,

Michael and Suzanne Staum
From: MARY ROSE <roseworks1@gmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 2:53 PM
Subject: LPG storage at Reading

Mr. Bimber,

I hope you are listening closely to our many arguments for closer study of Inergy's plan to store propane in the salt wells, and the proposal for the 14-acre brine pond on the hill above Seneca Lake.

I grew up here in Glenora, just 7 miles north of Watkins Glen. In 2009 I bought a permanent home here, looking forward to a hard-working retirement and a place for my sons and their children to visit and grow.

Your agency must make a more thorough assessment of Inergy's proposal before okaying the project. I'm especially concerned that there has not been a viable emergency response plan developed for coping with the numerous spills or leaks that "could" happen. Surely our little towns can't be expected to respond successfully, nor can we afford to.

Please expand the dSEIS for this proposal. We can not afford a "wait and see" to this.

Thank you,
Mary Rose
80 N. Glenora Rd.
Dundee, NY 14837
From: "Rick and/or Bette Ek" <ek@stny.rr.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 2:36 PM
Subject: LPG Storage Facility

David L. Bimber
November 14, 2011

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

Dear Mr. Bimber:

I am writing in regard to the proposed underground storage facility for liquefied petroleum gas in Reading NY. I have read or heard the many legitimate concerns about this proposed facility and am in strong agreement that a quantitative-qualitative risk assessment must be performed to objectively analyze these concerns.

I am particularly concerned about the statements made by Inergy officials regarding the anticipated amount of truck traffic as a result of this facility. As has been already pointed out, the revenues generated by the tourism and tourism-related businesses, wineries, and property taxes are paramount. Heavy industrial traffic is certainly a major threat to these revenues and a threat to the quality of life in a highly-regarded area of our state. The health and safety issues involved, as well as the incongruous statements made by industry officials that it is doubtful that the area will not see "a material increase in traffic," should be of concern to every thinking citizen of the region.

These disturbing incongruities are underscored in an article by Peter Mantius (11/3/11) on the planned rebuilding of the one-way bridge at the intersection of Route 14 and 14A, a project which will cost approximately $2.68 million dollars in state and federal funds. DOT's website states that construction will begin in the fall of 2012 and be completed in the fall of 2013.

Below I am quoting directly from the article by Mr. Mantius:
Requiring large trucks to go around the existing bridge for two years could complicate plans for a major liquid petroleum gas (LPG) truck-rail depot on Route 14A less than half mile west of the bridge. Kansas City-based Inergy has said it plans to build a depot capable of handling up to 48 LPG trucks a day to service its proposed LPG storage facility in salt caverns owned by its subsidiary, US Salt.

In its Sept.28 advisory, DOT said heavy trucks traveling north on Route 14A should instead pass under the Gabriel’s Junction bridge and use the Route 14A entrance ramp for southbound traffic on Route 14. This requires a hard left turn of more than 90 degrees across traffic traveling at 55 miles per hour.

If Inergy meets the goal it has set to begin operating its LPG facility and truck-rail depot by April 2012—roughly 18 months before the bridge rebuilding is scheduled to be completed—thousands of LPG tankers would have to make the awkward left turn across Route 14 traffic.

Brian Kelly, acting regional director for DOT Region 6, said state engineers are assessing the level of hazard involved in making the left turn. He said the entrance ramp may need to be “reconfigured”.

Dennis Fagan, chairman of the Schuyler County Commission, said he did not know the DOT planned to rebuild the 14A bridge at Gabriel’s Junction or that the state had posted a 11 ton weight limit on it. Asked to comment on the potential danger of LPG tanks turning left across Route 14 traffic for up to 18 months, Fagan said he doubted Inergy would meet its goal of opening the truck-rail depot by April. He estimated that it wouldn’t be completed until next fall at the earliest.

Kelly said the decision to rebuild 14A was made by DOT engineers and was neither connected to Inergy’s plans for the truck-rail depot nor influenced by officials outside the DOT. “There is no such link to Inergy,” Kelly said in an interview. “This is about a bunch of engineers looking at a bridge that’s old.”

In my view any reasonably bright 6th grader would be greatly alarmed by the dangerous conditions outlined in the DOT statements above, but question the claim that there is no connection between the bridge project and the proposed storage facility. Mr. Fagan’s statement is that he “doubted Inergy would meet its goal of opening the truck-rail depot by April” and that he “estimated that it wouldn’t be completed until next fall at the earliest” do not address the issues stated above of truck-traffic estimates above (thousands) and their potential impact on safety.
It has also been reported that the DOT is rebuilding a bridge on route 226, a rural road connecting Route 14A with Savona, the location of an existing LPG storage facility, that will cost 1.9 million. This cost plus the possible cost of "reconfiguring" the 14A entrance ramp for southbound traffic on Route 14 will no doubt be born by taxpayers. It's difficult to believe that these construction priorities are not linked to the planned LPG facility and would chiefly benefit the Inergy company. The industry's claim that the traffic impact will be in the fall and winter seasons, and therefore will not impact tourism, is not empirically supported and again does not negate the potential volume and risks of industrial traffic in a non-industrial area. The impact of air quality and the risk to citizens, particularly children, posed by a large number of diesel-fueled trucks is also one that must not be ignored.

This issue, particularly what appear to be incongruous statements in the quoted article, provide even more reason to conduct a quantitative-qualitative risk analysis to determine the real impact of traffic which appears to have been minimized by the industry. It is not only the area around Watkins Glen and Reading which will be impacted. The potential of 48 LPG trucks a day (and likely more if the facility expands, which has not been ruled out) are of concern to any communities likely be on truck routes.

I implore the DEC to deal with a number of issues not addressed and disclosed in the dSEIS. What sounds like a really stupid idea typically is a really stupid idea. The DEC has the responsibility to be sure that really stupid ideas are not allowed to threaten the health and quality of life of countless citizens.

Sincerely,

Bette J. Ek
Professor Emerita
Elmira College
From: Christi Jennings <christi@sleepsquares.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 11/14/2011 11:13 AM
Subject: Proposed LPG reserve

Hello,

I'm writing to express that an LPG storage facility NOT be allowed in the Seneca Lake area. I believe that the DEC in an ultimate goal of preservation of the environment should not support the industrialization by gas and energy companies in the Fingerlakes area. I am a resident of Lansing, NY in Tompkins County and appreciate your making note of this concern.

Thank you! Christi Jennings

--
Christi Jennings
Upstate Dream Institute
and Slumberland Snacks
888-725-9664 x 111
From: <Liltiller50@aol.com>  
To: <dlbimber@gw.dec.state.ny.us>  
Date: 11/14/2011 10:13 AM  
Subject: LPG facility and hydro-fracking

Dear Mr. Bimber,

I would like to join hopefully many others in expressing my opposition and concerns regarding hydro-fracking and the proposed LPG facility in the Town of Reading.

While state budgets are being stretched so thin I'm skeptical the state will be able to provide the over sight to insure all regulations placed will be abided by.

I'm concerned about the long term effects of all the drilling. I have no doubts the earth will be effected. From my unscientific view shale is a pretty crumbly rock. How will it respond over time?

All the chemicals involved are a concern too. Life actually is a pretty fragile thing. Are we strong enough to survive and thrive this additional concentration of chemicals in the environment?

I'm concerned with all the greed factors that seem to be involved in this industry. There is some pretty strong evidence that while the public is being told this gas extraction will lower energy costs in America it probably won't. There are many other countries that have interest in this natural gas. There is a big network of pipelines to transport the gas to export locations. Obvious connecting of the dots by even an ordinary person says maybe we're not being led in the truthful direction.

It just seems to me it's time to redirect.

Serve the public Mr. Bimber. Serve the environment. There are other ways. I'm sure you know more about them than I do. Make those happen. We can then all have our energy and health and enjoyable communititis.

Sincerely,

Susan Wayne
Dear Mr. Bimber,

Please accept and enter the attached letter into the record for the proposed project cited above under review by DEC. I have reviewed the Draft Supplemental Environmental Impact Statement (draftSEIS) and offer the following comments for consideration. The proposed facility introduces a heavy industrial use to an area now predominately rural and agricultural in character, with residential, tourism and agricultural uses, and which has significant scenic and cultural value.

The draftSEIS for the proposed Inergy LP project is not adequate and requires much more work.

Thank you for our consideration.

Michael K. Swasta
411 Watkins Road
Horseheads, NY 14845
Telephone/Fax: 607-739-2948
Email: <mailto:mswasta@stny.rr.com> mswasta@stny.rr.com
November 14, 2011

Mr. David L. Bimber
Deputy Regional Permit Administrator
NYSDEC Region 8 Office
6274 East Avon-Lima Road
Avon, NY 14414

Re: Written Public Comment - dSEIS
Finger Lakes LPG Storage LLC
Proposed Watkins Glen LPG Storage Facility
Project Number DEC Facility ID 8-4432-00085

Dear Mr. Bimber,

Please accept and enter this letter into the record for the proposed project cited above under review by DEC. I have reviewed the Draft Supplemental Environmental Impact Statement (draftSEIS) and offer the following comments for consideration. The proposed facility introduces a heavy industrial use to an area now predominately rural and agricultural in character, with residential, tourism and agricultural uses, and which has significant scenic and cultural value.

The draftSEIS for the proposed Inergy LP project is not adequate and requires much more work.

Nationwide only a small percentage of underground LPG storage facilities are in salt caverns. Since 1972 there have been 11 instances of catastrophic failure of underground gas storage facilities and each one has been a salt cavern facility. There are many reported examples of rail tank car accidents and explosions which have produced catastrophic results. These include:

Lincoln CA LPG Rail Tank Car Fire in August 2011
- 5,000 gallons of water per minute on fire to cool tank and maintain its integrity
- More than 2 days to bring fire under control and burn itself out
- 4,000 to 5,000 homes evacuated
- School closings affecting 6,000 students
- Could produce a fireball several hundred yards wide
- Mandatory evacuations 1-mile radius
- Expert EM response team from TX took more than 12 hours to arrive on scene

1973 explosion in Kingman AZ killed 11 and injured 100, shrapnel thrown a mile, tank thrown one quarter mile leaving a 10 ft deep crater

1978 Waverly TN explosion, 16 killed, over 40 injured
An Emergency Response Plan is not included in the draft SEIS. Inergy LP plans to develop one before the facility is made operational. I strongly recommend that Inergy LP be required to submit a complete Emergency Response Plan now to allow for public review and comment. Why not provide the plan now for public comment? Is it that a comprehensive plan which details the full range of types and magnitudes of emergencies requiring action would at this time generate negative public comment in opposition to the proposed project?

"Safety and Operational Issues"

- "Emergency Plans (Reference p158/186, Finger Lakes draft SEIS pdf) – Management should consider all the potential emergencies that the site might experience. Prior to the commencement of operations, Finger Lakes will submit to the DEC and local emergency officials, an Operations, Maintenance and Contingency Plan. This Plan will, among other things, contain an Emergency Response Plan..."
- "Emergency Response Program" (Reference p168/186, Finger Lakes draft SEIS pdf)

The Draft Supplemental Environmental Impact Statement (draftSEIS) provides only five (5) examples of potential accidents and systems/equipment failures at other LPG storage facilities. Several items are given short shrift, pre-judging the likelihood of such accidents or failures as being non existent. Again, I recommend that Inergy LP be required to submit a complete listing of known, probable or conceivably possible accidents and failures now to allow for public review and comment. I also suggest that an independent third party be commissioned by Inergy LP to prepare this report.

Reference p171/186 Finger Lakes dseis pdf

"4.6.4 Potential Accidents at Underground Hydrocarbon Storage Facilities and Mitigating Factors
Based on industry reports, some examples of potential accidents at salt cavern LPG storage facilities are as follows:
1. Surface and Subsurface blowouts
2. Wellhead Failure
3. Accidents Involving Truck Transport
4. Accidents Involving Rail Transport
5. Potential general hazards associated with the handling of LPG"

The draftSEIS comments on the availability of 1,000 gpm and a future fire hydrant system of undisclosed capacity to provide water for emergency and firefighting use. For the recent August 2011 LPG rail tank car fire in Lincoln, CA, up to 5,000 gpm of water was used to cool the tank and maintain its integrity to prevent it from exploding. Water was applied for over 40 hours until the fire burned itself out. This speaks for the need for a large volume of water over an uninterrupted prolonged period of time, for a reliable first emergency response of both manpower and equipment, and standby firefighting equipment, as well as well trained and committed first response. For this proposed Inergy LP project, this is a region comprising mostly volunteer firefighting and medical/ambulance crews.

411 Watkins Road Horseheads, NY 14845-2146 Telephone/Fax: 607-739-2948 Email: mswasta@stny.rr.com
Letter November 14, 2011
Mr. David L. Bimber
Comments on dSEIS for DEC Facility ID 8-4432-00085
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Reference p172/186 Finger Lakes draft SEIS pdf

"4.6.5 Capabilities of Local First Responders to Manage the Effects of Accidents
In the case of a fire or accidental release, local emergency responders will be called in to assist plant personnel in controlling the effects and if necessary initiating community emergency action plans. Finger Lakes will have at least 1000gpm of water available (from US Salt’s existing freshwater supply and a future hydrant system) in both sections of the facility for firefighting, cooling or LPG cloud dispersal."

For the Lincoln, California fire it took an expert EM response team from TX more than 12 hours to arrive on scene to assist local emergency personnel. A delay in response of technical support and expertise risks a catastrophic conclusion to an incident. Do local hospitals offer the types of service and care that may be necessary, ranging from severe burns, trauma and critical care?

On the subject of suitability and integrity of the Brine Pond Liner:
The proposed brine pond liner consists of a 45 mil reinforced polypropylene geomembrane, a geonet drainage layer and a 60 mil polyethylene geomembrane textured liner. Cuts, rips and tears requiring repairs to or replacement of this liner are discussed at length in the draftSEIS. However, the subject of liner seams, their integrity and workmanship, does not appear to have been included in the project narrative. A liner for a 13 or 14 acre brine pond cannot be constructed as a one piece seamless membrane. Large manageable sheets of membrane are joined together, typically involving a seaming process in which liner membrane sheets are lapped and chemically and/or heat “welded” together. The process may include seam joint sealants and cover or batten strips of membrane material bonded over seams. The integrity of membrane liner seams is a fundamental weakness of this type of system. Final seaming, the laps, welding and seals, will take place on the project site, subject to site environmental and physical conditions. Seaming relies on first rate workmanship, elimination of human error, quality materials (elimination of product and systems defects), and rigorous, continuous, jobsite inspection and testing.

The following recommendations related to the brine pond liner and its installation is offered:
- An irregular shaped pond liner more difficult to install than a basic rectangular pond liner. Reevaluate the design configuration of the pond. The proposed generally “kidney shaped” pond is more difficult to fabricate and install.
- A typical warranty 20 years is specified – require extended warranty and bond(s) for repair and/or replacement during the warranty period?
- Subject installation work to continuous onsite inspection?
- Require “Special Inspections” of manufactured products and their installation by an independent third party under provisions of NYS Building Codes?
- Continuous inspection of field lapping and seaming/sealant work. Specify “premium” laps and seals. Shop fabricate liners in maximum sizes possible, subject to factory inspections.
Brine overtopping berm due to sustained heavy rainfall or high winds – please give consideration to the following:

Is the design adequate or can it be improved upon?
- This is the time of year (late summer and early fall) when the brine pond will be full to capacity as the salt cavern(s) are loaded with LPG.
- Overtopping berm on north, east and south sides should be a serious concern regardless of the freeboard built into the design. Please consider adding a spillway and collection channel to capture brine? Strengthen or harden construction of the top of the berm as a safety precaution should brine overtop the berm due to a sustained high wind event or heavy rain storm (tropical storm or hurricane conditions). If a projected wind gust of 55 mph is estimated, design for it or greater, instead of the 50 mph design. If the projected severe rainfall event is 10-inches from a 100 year storm, design to a higher standard and greater rainfall. 100 year storms seem to be occurring with greater frequency in the region seemingly every five years or so.

Surface ground water collection channel (swale) along west pond berm. Please give consideration to the following suggestions:
- The bottom of the swale and bottom of the pond berm are one in the same. Due to the length of the brine pond, numerous existing drainage channels that originate upslope and drain eastwardly to the brine pond berm are being collected and drained around the pond to the north and south. Suggest the design be reconsidered to provide a new separate swale as primary collection and a secondary smaller swale at the base of the brine pond berm.

Flare Stack:
As designed and proposed, the adequacy of the flare stack has been questioned. If other solutions are not available to dispose of excess gas to replace the flare stack, recommend DEC require the best, most efficient solution for this design issue:
- Has HAASE high temperature combustion flare stack system, or better, been incorporated into the design? If not, I suggest that it should be considered.

Other concerns must be addressed prior to completion of a Supplemental Environmental Impact Statement and issuance of permits for construction and operation of the proposed facility. I share
several concerns of Seneca Lake Pure Water Association (SLPWA), Gas Free Seneca, and other organizations and individuals. These concerns include the following:

1. I am concerned that the salt caverns do not have the geologic stability to properly contain the Liquefied Petroleum Gas (LPG) under the pressures specified without failure and potential harm to Seneca Lake. I strongly recommend that the dSEIS Scoping Outline include additional geological assessment of these salt caverns based on public comment made during the first public hearing.

2. I share concern about the environmental safety of Seneca Lake in regards to a catastrophic failure of the proposed brine pond above Seneca Lake. 
   - Gas migration;
   - Produced water and water migration;
   - Storage cavern pressures and pressure fluctuation; and
   - Prevention of salt intrusion into gas storage cavity and migration of stored gas from the cavity.

3. An independent third party evaluation of a Quantitative Risk Assessment has merit and should be pursued to evaluate the geologic stability of the US Salt solution salt caverns, and the feasibility of such a facility near Watkins Glen given the geographic location within a glacial valley.

4. A study to evaluate the social-economic impacts of the project on the already established and growing tourism and wine industry of the region must be done. New development of the scale proposed must not be allowed to negatively impact what is already here. Risking the vitality of this growth in an area that has faced economic uncertainty in the past may be misguided.

Certain specific Impacts on air quality and noise must be mitigated to a higher standard, or eliminated altogether, for example including but not limited to:

- Compressor and other facility equipment exhaust; and
- Compressor and other facility equipment noise.
  1. Sound attenuation of equipment, mufflers, and high performance motors;
  2. Compressors located in acoustically improved, sound attenuated buildings or structures; and
  3. Emissions control, mitigation
Increased truck traffic on NYS Rte 14 passing through the Village of Watkins Glen must be thoroughly studied and appropriate mitigation measures implemented. Truck traffic on Rtes 14/14A at the access to the proposed facility may require:

- New traffic signals to access the proposed facility where none presently exists;
- Alternatively, consideration should be given to construction of a new on and off ramps and bridge over Rte 14 to access the facility;
- Mitigation of truck noise;
- Mitigation of visual impacts of the truck railroad loading facilities; and
- Negative impacts to public health and safety due to truck and rail traffic.

Due consideration must be given to “home rule” rights to protect the communities of the Finger Lakes region, Seneca Lake and its watershed. The capabilities of the salt caverns to store LPG and the natural gas within our watershed and will not go away in the future. DEC shares an obligation to indefinitely delay these proposed activities until we are certain of their environmental and fiscal impact to our communities, our lake and its watershed. This is a moral right and obligation.

Thank you for your consideration.

Respectfully submitted,

(signed)

Michael K. Swasta
411 Watkins Road
Horseheads, NY 14845
Telephone/Fax: 607-739-2948
Email: mswasta@stny.rr.com
Dear Mr. Bimber:

As a resident of the Finger Lakes region, I am writing today to express my deep concern regarding the gas storage hub proposal. For the record, I am strongly opposed to the idea for economic & environmental reasons. I am aware the state of New York is facing many difficult issues at present, but the risks involved in the proposal are, from my perspective, too great for us to bear.

If the history of Niagara Falls has anything to teach us, it is that as a state, and a unique geographic location, our greatest resource that sets us apart from the rest of the country is our abundance of water and the beautiful vistas that surround them. These must be protected with the utmost care, for our future economic welfare and more importantly, for the welfare of the generations that follow. Surely there must be other solutions that could be implemented to generate more favorable economic conditions within the state without risking the very resources that forge our identity.

In closing, I wish to respectfully remind you that any solutions set forth should always be in the best interest of future generations of this state and nation, for that matter. Any solution that does not consider the larger picture is a mistake. It is easy, for political reasons, to succumb to the quick solution that will foster immediate gratification with the people. But how will our legacy be viewed for posterity? This is the greater question, the only issue of lasting importance.

Sincerely,
JD Perry
The Dictionary Definition Of "Safe" Is "Free From Harm Or Risk"

By Robert E. Davis, publisher of www.preservethefingerlakes.com

Proponents of hydraulic fracturing claim that it is "safe" and should be allowed in New York. How can this be when even companies involved in it admit that their operations are hazardous and risky. Their admissions are self-indicting and damning.

A statement by Cabot Oil and Gas in a 2009 filing with the Securities and Exchange Commission stated:

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D. C. 20549
FORM 10-K
ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d)
OF THE SECURITIES EXCHANGE ACT OF 1934
For the fiscal year ended December 31, 2009
Commission file number 1-10447

We face a variety of hazards and risks that could cause substantial financial losses

Our business involves a variety of operating risks, including:

- well site blowouts, cratering and explosions;
- equipment failures;
- uncontrolled flows of natural gas, oil or well fluids;
- fires;
Our operation of natural gas gathering and pipeline systems also involves various risks, including the risk of explosions and environmental hazards caused by pipeline leaks and ruptures. The location of pipelines near populated areas, including residential areas, commercial business centers and industrial sites, could increase these risks. As of December 31, 2009, we owned or operated approximately 3,500 miles of natural gas gathering and pipeline systems. As part of our normal maintenance program, we have identified certain segments of our pipelines that we believe periodically require repair, replacement or additional maintenance.

Another company has made a similar admission in a Prospectus supplement.

Range Resources Corp · 424B5 · On 5/18/06

Filed On 5/18/06 9:51pm ET · SEC File 333-134157 · Accession Number 950134-6-10262

Our business is subject to operating hazards and environmental regulations that could result in substantial losses or liabilities

Oil and natural gas operations are subject to many risks, including well blowouts, craterings, explosions, uncontrollable flows of oil, natural gas or well fluids, fires, formations with abnormal pressures, pipeline ruptures or spills, pollution, releases of toxic natural gas and other environmental hazards and risks. If any of these hazards occur, we could sustain substantial losses as a result of:

- Injury or loss of life;
- Severe damage to or destruction of property, natural resources and equipment;
- Pollution or other environmental damage;
- Clean-up responsibilities;
- Regulatory investigations and penalties; or Suspension of operations.

As we begin drilling to deeper horizons and in more geologically complex areas, we could experience a greater increase in operating and financial risks due to inherent higher reservoir pressures and unknown downhole risk exposures. As we continue to drill deeper, the number of rigs capable of drilling to such depths will be fewer and we may experience greater competition from other operators.
Dear Mr. Bimber,

I'm sending the following statement to you post-November 14th since its basis is not so much a yea or nay to the Inergy LPG Project plan, covered under DEC guidelines for comment, as it is a general concern about the infrastructure needed to support that plan. Do what you will with it; I wrote it with the intent of suggesting some points to be thinking about as the project moves forward. Pass it along to interested parties or hold it off to the side for further review later on, my purpose in drafting it was to raise some issues as DEC final approval for the project is pending. My strong guess is that this project is going to proceed forward no matter what we in the public have to say about it; nevertheless, I'd ask Inergy, you at the DEC, and other NYS agencies seriously take a look at what's need to carry this project through successfully and safely for our community. That means thinking about traffic impacts, real impacts on local businesses, and the personal impact on those of us who live here and have to deal with these matters on a daily basis. If you at the State level haven't already done so, I'd ask for a full review of the project by ALL pertinent state agencies: DEC, DOT, etc. That way, the project can "be done right." If LPG is going to go through for Watkins anyway, we might as well see to that it's done properly. That means we should have the infrastructure to sustain it—both economically and in terms of local roadways/traffic concerns. If we don't, we all might as well hang up the towel on the entire project.

Thank you for listening to my concerns.

Luke Rondinaro
Watkins Glen, NY
**INERGY LPG PROJECT SHOULD NOT GO FORWARD WITHOUT IMPROVEMENTS TO LOCAL TRANSPORT INFRASTRUCTURE**

**INTRODUCTION**

Regarding the proposed LPG storage facility just north of Watkins Glen, New York, I wish to lend my voice to those speaking out against the project. Many have already raised concerns about the environmental impact of the plan. My own concern is for what effect it might have on the local community in terms of the physical sense of its infrastructure.

Without further infrastructural development to the transit ways of Watkins Glen, the Town of Reading, and other surrounding rail and roadways in our area, I'm afraid an already growing problem of gridlock and traffic congestion in our localities is going to get far worse.

We already have a problem with the Forth Street & Main intersection in WG. With growing business in our village and in nearby townships through our wineries and budding tourism industry, we're already seeing backup in Watkins throughout the year but especially during the Summer months. What happens when we add Inergy's proposed project to the mix? ... Even more gridlock! Even if with supposedly minimal truck traffic and increased rail traffic moved through in Wintertime, we can expect the average output of all traffic (cars, trucks, and trains) to increase if this project moves through. Add that to what we get from business transits from/to Walmart, race traffic in the Summertime, and our burgeoning tourism/wineries business in the Finger Lakes region and esp. here in-and-around Seneca Lake and you've the makings of an infrastructural nightmare for our area.

Without serious consideration given to throughput in Watkins Glen, Montour Falls, and the surround we'll be putting our traffic ways and our businesses in unnecessary stress/strain over a problem that can be easily averted. Therefore, I ask the following two points be brought into consideration. (1) Put a moratorium on the project until ALL these possible impacts environmentally, socioeconomically, and infrastructurally can be more intensively analyzed and assessed. (2) But if the project is to move through anyway, at least advise local and state governments to push for and secure from Inergy corporation promises to allocate monies for the repair and re-design/development of local infrastructure.

**MY RECOMMENDATIONS:**

Revisit and redesign the intersection between Franklin Street (Rt.14) and Forth Street. Means must be found for keeping normal car and truck traffic through Watkins Glen continuously moving without jam, either in the North-South direction along Route 14 or in the East-West direction. Business traffic to major local businesses (Cargill plant, US Salt plant on Salt Point Road, and Walmart store) can't viably be competing with normal through-traffic and winery goers/tourists for precious space on these roadways as they now stand, without the bottleneck that already exists there getting far worse and causing a bad accident now or in the near future with any possible environmental fallout that comes from it, should say a tractor trailer tip over spilling its load into the street and causing a pileup of vehicles thereby increasing the potential damage from such an accident. Therefore, in order to avoid this problem, this intersection in Watkins should be redesigned and reconstructed. How to do it of course is an open question. But one point is clear. Trucks should not have to be making their wide berth turns in this intersection no matter how 'wide-enough' authorities in question think this junction between Forth Street and Main is.
Secondly, I would recommend a bypass be built around the eastern edge of the village. In part, this would be for trucks and other delivery vehicles … making it more simple and efficient for getting to Walmart and the Cargill plant. However, it would also be useful too for through-traffic wanting to get from Watkins and on to their desired destination outside of our community, should they want to. Now while there's a clear advantage business-wise for having them move thru downtown Watkins Glen, it's a major headache on a busy day just trying to get in and out-of-town when all they want to do is pass through without having to stop or be slowed down by jammed up traffic. So, by building a bypass on the outskirts of Watkins near the East side of town, we'd be relieving some of this traffic burden thereby preventing the possibility of a serious accident taking place in midst of our village.

My third recommendation concerns Salt Point Road, namely the South entrance to Salt Pt. (also known as County Route 30). Currently this intersection is three-way junction for traffic coming up from local properties on Seneca Lake, regular traffic coming from Salt Point itself, and incoming cars, trucks, and other vehicles going to/coming off Route 14 outside of Watkins Glen. As such, it's another potential bad accident waiting to happen. Cars/trucks rush onto the road from the highway, tractor trailers end up making blind wide berth turns off and onto the road itself, and other vehicles are seen rushing up from the lake. For those trying to get off Salt Point, they often have to rush out into traffic just to get on the highway when there's a break in the space of moving vehicles. But for those already on Route 14 seeing people suddenly pop onto the highway can't be all that welcome a sight either, esp. when they've done it right in front of them. Therefore, it only makes sense to install a traffic light at the entrance to Salt Point Road. That way, we're being mindful of all's concerns and accounting for everyone's safety at this junction between County Route 30 and Route 14.

Similarly, even though it's been mentioned in company documents from Inergy corporation, I would strongly recommend all the same that a separate access road be built for getting to said LPG facilities and the Salt Plant on Inergy LP's properties here outside of Watkins Glen. That way, with any increase in traffic that does accompany Inergy's further development of the US Salt Plant and the LPG project, residential Salt Point Road itself won't be made into a crazy, noisy madhouse for the people who live there, for those who come here during the Summertime, vacationers, bicyclists, and pedestrians. By constructing a separate access road, and having that be the main entryway for plant workers, trucks going to and from these facilities, and others who've business with either the Salt Plant or the new LPG operations, we'd be doing better both for local residents and business at said plants in question. Traffic output could be increased without having to be a major nuisance for people on Salt Point Road or the condition of the roadway itself. That's why I believe a separate access way would be good for us all if indeed this LPG project moves forward upon receiving a DEC go-ahead.

Finally, I wish to raise a word of caution about our railroads, access ways, and interchanges. I recognize Norfolk-Southern, who maintains our local train routes, considers them all safe and reports they are all well-inspected and maintained without additional need of improvement or repair. However, upon considering at least thee different cases where the conditions of these transport zones are brought into question, it seriously begs the issue of how reliable these statements of railroad safety are here. At least one spot in need of attention is the railroad bridge spanning the Gorge in Watkins Glen State Park. If history is a guide we should be very cautious about assuming the safety of this railroad trestle. Built largely to the specs of the original bridge after it was washed away in the Flood of 1935, the current one stands to have the exact same things happen to it as happened with the first. In this regard, then, I recommend a detailed case study be made of the washout of the trestle during that flood. Upon doing that, the railroad bridge should be re-designed to prevent such circumstances from occurring again in the future. Only by doing that, and by honestly accounting for what effect both the heavy usage of these railways and the possibilities for unforeseen accidents might have upon them, will we be able to better
ensure the real safety of these rail routes around Watkins Glen as they begin to be used more per the LPG transport plan. Similarly, a cold hard look should be taken of the condition of the trackway and embankment stretching from right outside of the village of Watkins, down alongside Salt Point Road, and towards the premises of the former US Salt Plant (now owned by Inergy since 2008). Although exterior repairs/improvements have been made along this section of rail track (namely relocating a rail car changing station from the former Municipal Water Plant at the beginning of Salt Pt. to a spot three quarters up the road), no real attention has been paid the ground underneath assessing whether its gravelly base can actually better support an increase in rail traffic over that span. People have lake frontage/properties all along this distance. If increased train traffic dislodges this ground base, people's shore properties could very well be lost in the washout of heavy rains. This would further undermine the stability of the track way and end up dumping large amounts of railroad gravel, coal, and other filler onto the depleting shoreline and into the lake. Where, necessary, therefore, this railway route should be studied for its stability and its potential for erosion by the elements; as needed, it should be bolstered and abutted by concrete embankments and more solid foundation materials. Failure to do so, it seems, will only result in the degradation of the railroad itself; the very same train route we're using to insure the safe delivery of product to and from the Salt Plant. Why take that risk? ... Instead of leaving these outcomes to chances as with my last two examples, or with the railroad overpass spanning Route 329 outside of Watkins Glen, why not ensure their safety to begin with? ... Why not reassess these railway points and rebuild them to better handle the carrying capacity of the LPG project's transport loads? To do so only guarantees the safety and success of the project overall. Not to do so only ensures the kinds of accidents the project's detractors have warned us about from the beginning.

CONCLUSION

In summary then, the LPG storage plan is wrong for our area. In order to “do it right” requires an investment in local infrastructure that people here in our community would be unwilling to take to actually make the plan feasible. Furthermore, I doubt Inergy representatives, local politicians, or businesses would be willing to make these changes either to area highways, railroads, and interchanges. With that in mind, I maintain that the LPG project is wrong for Watkins Glen, the Town of Reading, and Schuyler County. I ask the DEC to withhold its support for the project until such time as the different parties involved in this discussion are willing to support these changes I've outlined above.

Thank you.

Luke Rondinaro
Watkins Glen resident
Town of Reading

November 18, 2011
November 9th 2011

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

Dear Mr. Bimber,

I moved to Hector, NY 2.5 years ago. Hector is a flourishing town dependent on agriculture and tourism. The south end of Hector looks across to the town of Reading and the U.S. Salt Plant, the site chosen for the LPG project. This letter is to urge you to rescind the application to continue with the development of this facility. I am originally from Elmira, NY. I am working on my dissertation in child psychology and admittedly, have limited knowledge on environmental engineering. However, due to my current living situation, I knew that it was my civic duty to educate myself on LPG and possibility of future hydraulic fracturing in this area. I have read the draft and attended a number of hearings. I feel confident now in an informed decision that an LPG facility could be detrimental if not devastating to our pristine region.

I moved from Elmira when my boyfriend and I decided to move in with one another. My boyfriend grew up in Hector. He left temporarily to study graphic design in Boca Raton, FL. Immediately after completing his degree, he returned to Hector. The hustle and bustle of a concrete jungle deterred him. Sure, pay was great for graphic designers. But nothing was comparable to life in Hector. My boyfriend grew up in the Vineyards. His family has owned farmland since the mid-1800s and planted grape vines in the 1970s. They witnessed, first hand, the surge of the wine industry in this area. This is no longer just rural farmland, but a community of loving residents who primarily support their families by working in the wine industry. My boyfriend, in fact, opened his own winery last year. Using his knowledge of viticulture and marketing, he is hoping to grow into a lucrative business while remaining true to the long history of his family and the community.

The environmental threats of LPG and “fracking” are considerable dangers to his and our community’s futures. I understand the importance of tapping into our natural resources and reducing dependence on other countries. In this case, it is simply not worth the risks.

I have fallen in love with an area sweeping with vineyards, farmland, kinship, and tourists eager to indulge in our beautiful resources (wine, hiking trails, water sports, gorges, and waterfalls). While Inergy insists that LPG is a “safe facility” I have learned that this is not an iron-clad promise. There are numerous holes in their theory and highlighted in the draft. Please refer to the number of written and verbal comments from seasoned environmental engineers concerning these deficits.

I and the vast majority of this community is fearful... incredibly scared, in fact... that the land once cherished by the Iroquois, and carefully tended to by generations of local Hector residents, could vanish in an instant given even the smallest mishap at the LPG facility. We need to maintain the purity of this land for future generations and for tourism that exponentially grows due to international recognition. I kindly insist that you revoke the permit for this facility.

Thank you for your time and utmost consideration,

Rose L Wozniak

Hector, NY 14841
Dear Mr. Bimber,

This letter is to urge you to rescind the permit for the LPG facility planned in Reading, NY. I have spent nearly all of my 26 years in Hector, NY—a town quite near to Reading. My family has lived in Hector since shortly after its founding in the late 1700s. Our livelihood is based entirely on agriculture. My great grandparents began growing fruit and making profit from the harvest in the 1850s. 40 years ago, we planted over 100 acres of vineyards. These vineyards support a number of wineries. My rich family history of wine grape growing inspired me to continue the tradition. I have recently opened an Estate winery. Our grapes come entirely from my family’s farm. We cater to thousands of national and international tourists each year that come to experience our timeless and nearly untouched terroir and the fruits of our and the land’s labor.

When the LPG facility was initially proposed, I knew I would have to learn about a project that could have a significant impact on my business and on our area as a whole. I have spoken with and heard the comments of members of Inergy, Gas Free Seneca, and the community. As a result of these interactions, it is undoubtedly evident to me that an LPG facility carries enormous negative risks to the things our community believes in and strives for. I am now one of many local businesses who stand as a coalition against the LPG facility. However, it is not just enough to post notices on our lawn and sign petitions. I wanted to take an opportunity to personally write to you. My passionate opposition cannot be adequately illustrated in a signature.

I trust that you will make the best decision with regard to the development of the LPG facility. Inergy frequently states that they will be creating eight new jobs. My winery alone has created that many. It has also created job security for hundreds of vineyard workers in the area. In the past year alone, I know of three other wineries within just a few miles of my own that have opened. New wineries are popping up all the time. These are year-round businesses that promote tourism and sustain local livelihood. Even a small mishap at an LPG facility could destroy what has taken locals and our ancestors centuries to build and preserve. The tourist and wine industry are in grave danger—both of which has sustained our proud community for generations.

Thank you for your time,

Jason M. Hazlitt
Employees at Hector Wine Company are insistent on educating visitors to the tasting room. We recently began distributing a letter for those that heard and agree with our plea. Enclosed, you will find a number of these letters signed by concerned tourists. This land matters to them as well. Please include these among the 350+ letters you have received to date.
Dave L. Bimber  
Deputy Regional Permit Administrator  
Division of Environmental Permits  
New York State Department of Environmental Conservation (Region 8)  
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,

I am a visitor to The Finger Lakes Region. I have not read the Draft Environmental Impact Statement issued to The New York State Department of Environmental Conservation by Inergy Corporation. I do, however, understand that the plan to store liquid petroleum gas in the salt caverns below Seneca Lake sounds very risky.

The idea alone, of any increased traffic in Watkins Glen, New York makes me very hesitant to consider travelling through that town – there’s really entirely too much truck traffic as it is. Not to mention the dangerous cargo that could be moved if this plan were to take place. Even if this proposed hub focuses on rail car transportation, the rail road tracks go straight through Watkins Glen as well.

From what I understand gas storage within salt caverns is very dangerous, and does not have a good track record. It will also require a brine pit, and possibly a gas plume. These toxic signs of a heavily industrialized area are not why I visit The Finger Lakes Region. I keep seeing the “No LPG” yard signs, and it is made obvious that many of the residents surrounding Seneca Lake do not want this project to continue. I understand there are over 4,000 signatures on petitions against this project, and over 150 businesses in a coalition opposing it as well. (I would assume that those are considered as public comments?) I visit this area to enjoy the wine, the natural beauty, and the people. I will unfortunately have to reconsider if it is further industrialized by this specific project. I can vacation where ever I want, I picked Seneca Lake.

If this proposed gas storage facility is not done safely I may not return to spend my hard earned money in these wonderful wineries. If there is any risk of this project hurting the area in any way, I must say Seneca Lake is special enough to reconsider the entire idea. I do not want to see this landscape change at all. I do not want to see large corporation, gas company industrialization happen here. It seems this project is ill suited to this area and should be done else where. I understand there is a similar facility in Savona, why not there? Mr. Bimber, please revoke the permit for this project in The Finger Lakes.

I visit Seneca Lake for WINE NOT BRINE.

Thank you for considering my comments,
Sincerely,

[Signature]

08 Nov 2011
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Sincerely,

[Signature] 11-8-11

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

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[Signature]

Emma Schockner
Dave L. Bimber  
Deputy Regional Permit Administrator  
Division of Environmental Permits  
New York State Department of Environmental Conservation (Region 8)  
6274 East Avon-Lima Road  
Avon, New York 14414-9516  

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Mary M. Budack
Dave L. Bimber  
Deputy Regional Permit Administrator  
Division of Environmental Permits  
New York State Department of Environmental Conservation (Region 8)  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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[Signature: Donna Bates]
Dave L. Bimber  
Deputy Regional Permit Administrator  
Division of Environmental Permits  
New York State Department of Environmental Conservation (Region 8)  
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[Signature]

Cynthia L Carolp
**CCU Comm Correspondence Unit - Correspondence [Rodrigues, Kylie] #185906A**

**From:** Elizabeth Reisinger <Elizabeth_Reisinger/NYEC@chamber.state.ny.us>  
**To:** <ccu@gw.dec.state.ny.us>  
**Date:** 10/3/2011 4:27 PM  
**Subject:** Correspondence [Rodrigues, Kylie] #185906A

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*** Please Do Not Reply to this e-mail Message.***  
*** Any questions regarding this correspondence should be directed to the staff person listed below as the 'Please Respond To' contact. ***

This correspondence has not been acknowledged and is being forwarded for appropriate handling. Please provide a copy of response or any other instructions to ECO router. -- Please respond to Elizabeth Reisinger

Mrs. Kylie Rodrigues  
6258 State Route 414  
Hector, NY 14841  
bure3028@yahoo.com  
County Schuyler  
Addressed to: Governor

Issue 1 40010 Dept. of Environmental Conservation

Correspondence Number: 185906A  
Date Of Correspondence: 09/29/2011  
Date Received: 09/29/2011  
Date Entered: 10/03/2011  
Referred To: DEC  
Date Referred:

Routing History:

10/03/2011 04:27 PM (Routed By --> Elizabeth Reisinger) (Routed Via Outside Agency Email to --> DEC) This correspondence has not been acknowledged and is being forwarded for appropriate handling. Please provide a copy of response or any other instructions to ECO router. -- Please respond to Elizabeth Reisinger

Incoming Correspondence:

I would like to express my severe disappointment in your lack of interest in a major event occurring in the Finger Lakes Region of New York State- the same state that you are suppose to be representing and you should know what is happening in your backyard. Inergy Midstream, LLC is purposing to but a very
Dear Mr. Bimber:

SUBJECT OF THIS DOCUMENT: Safety Hazards of the Proposed LPG Storage and Need for a Risk Analysis by an Independent Third Party.

The extreme seriousness of the potential danger of an LPG storage facility of this magnitude at this location is shown by a) the nature of LPG and the quantity involved and b) prior histories.

a) The nature of LPG and quantity involved:

Concerns about the storage of LNG should also bring concerns about the storage of LPG, since the auto ignition temperature of LNG is 1004 deg F and LPG is 850-950 deg F; i.e. LPG will self-ignite at a lower temperature than LNG. (source: http://www.beg.utexas.edu/energyecon/lng/documents/CEE_LNG_Safety and_Security.pdf <http://www.beg.utexas.edu/energyecon/lng/documents/CEE_LNG_Safety%20and_Security.pdf> )

The energy density (energy/kilogram) of LPG is 46.4 megajoules and TNT 4.6 megajoules; i.e LPG has more than 10 times the energy density of TNT. (source: http://en.wikipedia.org/wiki/Energy_density
Two comments regarding the quantity of LPG:

First, According to the Description of Action: The proposed storage facility can contain 88.2 million gallons of LPG. The calculation below shows that:

We have the explosive equivalent of 129 atomic bombs dropped on Hiroshima Japan at maximum proposed storage at Watkins Glen!

From http://www.ecotec-systems.com/Resources/FUEL_CONVERSION_WORK_SHEET.pdf

We have, 1 gallon of LPG = 96.3 megajoules HHV (88.1 LHV)

Taking the average of HHV and LHV gives: 
96.3+88.1= 184.4 / 2 = 92.2 megajoules

Converting to gigajoules gives: 92.2 x 0.001 gigajoules/megajoule = 0.0922 gigajoules / gallon

0.0922 gigajoules / gallon x 88.2 million gallons gives:
8,132,040 gigajoules at maximum storage.

And from http://convert-to.com/conversion/energy/convert-gj-to-tn.html

We have 1 ton of TNT = 4.184 gigajoules

So, 8,132,040 gigajoules at maximum storage / 4.184 gigajoules per ton TNT = 1,943,604 tons TNT

We now divide this by 15,000 tons TNT / explosive equivalent of the atomic bomb dropped on Hiroshima Japan.

We have the explosive equivalent of 129 atomic bombs dropped on Hiroshima Japan at maximum proposed storage at Watkins Glen!


1 American Gallon = 0.0037854 cubic meters

and so, multiplying by the storage capacity of 88.2 million gallons we have 333,872 cubic meters of LPG at maximum proposed storage at Watkins Glen.

Note that as of 2008 the newest and largest LNG tankers held 265,000 cubic meters of LNG. Therefore 333,872 / 265,000 = 1.26 equivalent LNG tankers stored at maximum capacity at Watkins Glen!

This number is important because one tanker’s amount of LPG was enough for the DOE to commission Sandia Labs to evaluate the dangers of a natural accident as well as a terrorist attack at sea, in a harbor and in above ground storage tanks; i.e. this volume must be taken very, very seriously, since LPG has over 90% of the energy capacity/ton of LNG.

b) Prior Histories

The disaster in Italy from an LPG train “accident” is significant for this proposal.
The following is much of the non-technical part of their paper:

Simulation of the LPG release, dispersion, and explosion in the Viareggio railway accident
Sara Brambilla, Roberto Totaro, Davide Manca
Dipartimento di Chimica, Materiali e Ingegneria Chimica “G. Natta”
Politecnico di Milano – P.zza Leonardo da Vinci, 32 MILANO, ITALY

The manuscript analyzes the accident that occurred in the railway station of Viareggio (Italy) on June 2009. A freight train carrying LPG went off the rails and five out of fourteen wagons derailed and overturned. A hole formed in the first tank car due to the impact with a signaling stake. The pressurized LPG was released as a two-phase jet: the liquid phase formed a boiling pool on the ballast while the dense gas dispersed in the atmosphere. The dense cloud spread and moved towards the neighboring houses.

Afterwards, the cloud was ignited and exploded. The overpressure destroyed some residential buildings in the area closest to the explosion epicenter, while glasses were shattered in a larger area. Thirty-one people died and a number of residents were injured due to the fires that engulfed the surrounding houses. Starting from the data related to the tank cars, meteorological data, pictures of the site after the accident, aerial photos, witnesses of both civilians, and rescue teams, the manuscript reconstructs the dynamics of the accident by means of a dedicated software.

1. Qualitative description of the accident
On June 29th, 2009 at 11:48 pm a train loaded with LPG went off the rails while it was crossing the station of Viareggio (Italy). A tank wagon was damaged and the released LPG spread around, finally exploded, and burnt out. Thirty-one people died and more than thirty people were seriously injured. The train transported 14 cars with a nominal capacity of 110 m³, each loaded with 45 t of LPG. When the train came in the Viareggio station, the front axle of the first wagon broke and the wagon went off the rails. The first car detached from the tractor, overturned, and dragged nine more cars off the rails. Of the nine derailed wagons, only the first four overturned. The first wagon, which derailed and overturned, was dragged on the ballast, and crashed into a stake that was embedded in the ground. The impact of the tank with the stake produced a longitudinal crack in the metal vessel about 40-50 cm long and a few centimeters wide. When the axle failed, it plowed the ground, sheared several sleepers, and raised a heap of pebbles on the ballast. The drivers felt a strong jerk on the traction; they went to the window and saw the first tank car gone off the rails. The drivers applied immediately the emergency brakes and they could smell the gas. They had enough time to collect the carriage sheets, jump off the train, and run away trampling on the LPG pools on the ballast. Eventually, the drivers took shelter behind a party wall of the station and immediately after occurred the explosions and the fires (Dellacasa, 2009).

1.1 Consequences of the derailment
The pressurized LPG in the first car was released by the hole, and started spreading and evaporating on the ballast. The surrounding population could hear a loud noise like a gas emitted by a valve. The summer night was rather
hot and the people, who lived in the houses overlooking the station, went to
the open windows to see what was going on. They could see a white and short
cloud of gas that was moving towards their houses. Some people flew to the
top storey of the building although many houses were two-storied; some
decided to pick up some personal belongings but this choice was lethal; some
smelt the gas and ran away from home. The dense gas cloud moved radially
from the derailed tank mainly across the railway line, due to the rather
calm weather conditions. It is worth noting that there was not any safety
distance between the railway and the next houses, being the distance between
the line and the nearest house as short as 10.44 m. Some witnesses reported
that there were two/three explosions. It is not clear whether the first
ignition source was inside the ballast or among the surrounding houses.
However, when the ignition occurred, besides triggering an explosion, it
propagated a fire to the flammable portion of the cloud. It is also
difficult to get a clear idea about the elapsed time between the crack
opening and the first explosion. Some witnesses reported 2 min others 5 min.
The intense emotional agitation of residents in those moments did not allow
analyzing objectively the course of events. Eventually, the dense and short
gas cloud could find an easy way towards Ponchielli Street, which is a
narrow and long street that is parallel to the railway line and comprises
more than forty-two storied houses. A rather loose cement fence divided
Ponchielli Street from the station and the gas cloud went through it.
Finally, the LPG cloud, helped also by the hot night that saw a number of
windows left open, entered the ground floors and basements and accumulated
until an ignition source made it exploding and/or burning.
Five houses collapsed due to inner explosions. Almost all the remaining
houses of Ponchielli Street burned due to the following fires that engulfed
also other areas surrounding the station. The pool fire, produced by the
spreading of LPG released by the punctured wagon, could be noticed far away
and exceeded the electric grid with flame lengths as high as 20-25 m.
Fourteen people died immediately: some under the collapse of buildings; some
due to the toxic substances released by the fire of their houses; some were
literally run over by the flame radiation. The fatalities rose to 22
people the day of the state funerals. Finally, there were 31 fatalities (one
woman had a heart attack) and the last person died exactly two months after
the accident. There were two children among the victims and more than thirty
people were seriously injured. About 1100 people had to evacuate their homes
for safety reasons either due to unsafe buildings or to areas exposed to
further risks. As a matter of facts, the firefighters had to remove the LPG
load from the derailed wagons that withstood the accidental event. The
overall damages that involved the population and the infrastructures were
valued 32 M€. The consequences of the accident would have been even worse if
the stationmaster had not stopped two passenger trains that were arriving in
Viareggio a few minutes later. Nonetheless, the Viareggio accident is the
worst railway accident that ever happened in Italy as far as the
transportation of dangerous goods is concerned. The Viareggio event is also
the worst accident ever occurred in Italy with reference to LPG production
and transportation.

3. Conclusions
The dynamic analysis of the Viareggio accident showed how vast and fast were
the emission and dispersion of the LPG cloud towards the surrounding houses.
It took less than 100 s for the dense-gas cloud to reach the furthest house
that eventually exploded. Such a short time inhibits any emergency-response activities aimed at reducing the accidental outcomes. Conversely, only some kinds of countermeasures, designed and installed a priori (e.g. protective barriers), can reduce the impact of the accident.

I have put the conclusion in bold type and note that we would need at least a hundred foot high protective "wall/barrier" around the entire rail and truck facility!

The next item concerns a projected underground storage site in Canada:

http://www.the-quality-of-life-initiative.info/A_Flawed_Project.html

Corridor Resources
Underground Salt Cavern Storage
In Kings County

The fact that southern Kings County contains a geologically layered deposit of salt does not automatically mean that the Cassidy Lake area is suitable for underground salt cavern storage.

In fact, just the opposite appears to be the case.

1.0 A Dangerous Risk

Salt caverns are the most dangerous of all storage methods, even though they make up only 11% of all underground storage facilities. They account for 41.5% of all serious 'incidents' (leaks, fires, explosions).

According to the most comprehensive study of underground gas storage to date (British Geological Survey, 2008), 41% of all underground salt cavern storage facilities operational in 2005 had experienced serious incidents. One third of all these incidents resulted in casualties or evacuations.

2.0 Structure Unsound

John Hopper says that catastrophic losses in salt caverns occur because of "single point failure." He is in a position to know. As vice-president of TPC Corporation, Hopper helped design the Moss Bluff Gas Storage Facility near Houston, Texas, for Duke Energy.

Beginning on August 19, 2004, explosions and fires rocked the Moss Bluff facility doing $20 million worth of damage, releasing more than $36 million worth of natural gas into the air, and causing the evacuation of some 360 people, up to 5 km away. Moss Bluff is now synonymous with disaster in the underground gas storage industry. Hopper, writing for Energy Markets in 2004, attributes the catastrophe to the single point failure of a valve. He recommends redundant systems to prevent future failures.

The British Geological Survey report concluded that at Moss Bluff a major underground pipe broke, allowed high pressure natural gas to rush to the surface through a brine pipe, rupturing the Emergency Shutdown System with a 'water hammer' phenomenon, and igniting the natural gas. The extreme heat
of the fire blew off the entire wellhead assembly. This failure occurred at a location in the pipework that had suffered a general loss of wall thickness due to internal corrosion – in a pipe only four years old. (Little surprise – what is more corrosive than salt water?)

Single point failure? Moss Bluff was one single point failure after another. The British Geological Survey report, in its risk assessment considerations, lists 3 general causes of salt cavern failure, 18 potential sites for failure, and over 100 vulnerable, specific failure sites. Duplication of virtually the entire facility would be required to insure safety from known hazards alone.

Consider also: If a multi-billion dollar corporation like Duke Energy could not avert the Moss Bluff disaster, who could?

1Depleted aquifers had an incidence rate of only 21%; depleted gas and oil fields only 3%.
4Duke Energy, through its subsidiary, Spectra Energy, owns 75% of the Maritimes and Northeast Pipeline here in New Brunswick. Though its subsidiary, Market Hub Partners (Canada) LP, Duke Energy is a major partner in Corridor Resources bid to build underground salt cavern storage at Cassidy Lake.

The next two items are reports from the British Geological Survey. Their data is applicable and must be used in your analysis.


An Appraisal of Underground Gas Storage Technologies and Incidents, for the Development of Risk Assessment Methodology

Prepared by the British Geological Survey for the Health and Safety Executive 2008


Failure Rates for Underground Gas Storage Significance for Land Use Planning Assessments

Prepared by the Health and Safety Laboratory for the Health and Safety Executive 2008

On page 21 of the above report is a summary of their recommendations
for salt cavern storage and site characterization:

it requires adequate knowledge of:

- the thickness and extent of the salt beds,
- presence and nature/distribution/thickness of non salt interbeds,
- presence and nature of more soluble evaporite beds,
- geological structure, including the likely presence of faulting.

It's clear that the DEC should not issue a permit without fully meeting the above criteria and that such data may require the expertise of an independent third party as part of the risk analysis.

The following reports deal with LNG, however given the notes above in a) The nature of LPG and quantity involved: they are suitable guides for caution, the size and significance of the potential problems, and the suggested methodology for risk analysis.

http://www.sutherland.com/files/Publication/bcde16b7-f7c5-4c82-81b6-56172d08c349/Presentation/PublicationAttachment/32b7e47c-07b6-48eb-b33d-cc913a742e2c/50010-042.pdf

OIL AND GAS LNG OBSERVER—ISSUES, TRENDS, TECHNOLOGIES

review process. And state and local govern- Sandia LNG study changes landscape for terminal siting

Jacob Dweck
Steven Sparling
David Wochner
Sutherland Asbill & Brennan LLP
Washington

http://www.coastaladvocates.com/pdf/031606_article_LNG terminal poses adverse impacts.pdf

Related to the above item:

timrileylaw.com A new 2006 Sandia Report reveals that a flammable LNG vapor cloud could extend 7.3 miles from 53 million gallons

Two more items which should be reviewed are:

2003 Safety of Salt Caverns Used for Underground Storage: Blow out; Mechanical Instability, Seepage; Cavern Abandonment.

<http://www.laohamutuk.org/Oil/LNG/app4.htm>

Sunrise LNG in Timor-Leste: Dreams, Realities and Challenges
A Report by La'o HamutukTimor-Leste Institute for Reconstruction Monitoring and Analysis  February 2008

Appendix 4. History of accidents in the LNG industry

It's clear from the above that the gravity of this project requires more than the hand waving of Inergy and that for the DEC, it's crucial to enlist an independent third party for the kind of necessary risk analysis that is beyond the normal capabilities of the DEC. I suggest Sandia Labs as a candidate.

Ignoring is not mitigating. The region and credibility of the DEC are at extreme risk!

Thank you,

Ross M. Horowitz
(member, Danby New York, Gas Drilling Task Force)
Mr. David L. Bimber  
Deputy regional permit administrator-NYSDEC  
6274 East Avon-Lima Rd.  
Avon, N.Y. 14414-9516  
Re: Public comment Project 8-4432-00085

Dear Mr. Bimber,

I entered comments in support of the LPG storage project at your public hearing of 11/3/2011 at the Watkins Glen High School Auditorium. After I spoke I realized that I had not articulated several thoughts that I feel are poignant.

Please consider this as addendum to same;

Please have as part of your approval, a plan that will bring to bear state of the art lighting fixtures and mounting techniques such that light spillage into the night sky will be truly minimal. In so doing, Inergy could minimize local fears of their project "Industrializing" our lovely rural county.

In as much as wine tourism is a driving factor of our local economy, increased truck traffic on weekends could truly interfere. It should be possible to preclude weekend loading and unloading of tractor trails except during the winter heating season.

Thank you for consideration of these inputs.

Regards,

Paul N. Marcellus  
701 N. Franklin St.  
Watkins Glen, N.Y. 14891
Commissioner Joseph Martens  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-1011  

February 26, 2013  

Commissioner Martens,  

For over 20 years, Pleasant Valley Electric has provided electrical contracting services to homes and businesses in New York State. I write today to express my support for Inergy's proposed Finger Lakes LPG Storage project, and to urge you to approve this project that puts New Yorkers to work.  

Safety is paramount to every member of our team. That is why the projects we support are meticulously engineered to meet the strictest regulations and operate at the highest levels of safety and integrity.  

We are enthusiastic to apply our commitment and expertise to the Finger Lakes LPG storage project. This is a shovel-ready project that presents an important economic opportunity for New York State.  

The LPG Storage project will mean $40 million in capital investment to Schuyler County. The project will create 50 skilled construction jobs, 8-10 high quality permanent jobs and generate new tax revenue to strengthen the local economy.  

The project will also support dozens of New York small businesses just like Pleasant Valley Electric, demonstrating that New York is truly open for business.  

Sincerely,  

Jamie Bobnick  
Pleasant Valley Electric  
Ithaca, NY
Commissioner Joseph Martens  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-1011  
February 27, 2013  
Commissioner Martens,  

My family has owned and operated S.P. Wilson Inc., a fuel supply company in Montours Falls, for more than 25 years.  

I am writing as a lifelong community resident and a small business owner who has followed the Finger Lakes LPG Storage project for years to urge the Department of Environmental Conservation to approve this critical energy infrastructure project.  

For small businesses like mine to grow, we need to be equipped with the right tools. The Finger Lakes LPG storage project will do just that. The demand for propane in New York is great. More than 20% of Schuyler County residents rely on propane for heating and cooking. In many Upstate areas, propane is the primary source of fuel. Despite the high demand for propane, our company cannot supply it.  

Why not? Because New York's propane infrastructure is inadequate. Propane must travel a long distance to get here – from far away places like Texas and the Midwest – and the result is high transportation costs and unreliable supply, which is bad for business and for customers.  

Creating a safe, reliable supply of propane right here in Schuyler County will help alleviate the burden of energy costs for hundreds of thousands of New York households and businesses. The project will also mean that my business is able to make this clean-burning alternative fuel available to our community.  

S.P. Wilson has served community residents for more than 50 years. I'm from here. I know that LPG storage is not new to our area. LPG has been stored and transported safely in this region for more than 50 years.  

As a small business owner, I'm always thinking about the future. The Finger Lakes LPG storage project will spur the investment, job creation and critical infrastructure necessary for our community to have a prosperous one. That is why I urge the Department of Environmental Conservation to approve this critical energy infrastructure project.  

Sincerely,  

Jamie Wade  
Owner, S.P. Wilson Inc.  
Montours Falls, NY
Villager Motel & Glen Manor  
106 E. Fourth Street  
Watkins Glen, New York 14891  
607-535-7159 e-mail: glvillmt@aol.com  
www.wg villagemotel.com

Commissioner Joseph Martens  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-1011

February 28, 2013

Commissioner Martens,

As owner of the Villager Motel in Watkins Glen for the past 26 years, I know firsthand how critical tourism is to our economy. My business depends on the visitors who come here to enjoy our scenic views and pristine lakes.

Our natural assets are also engines for economic development. They create jobs, drive investments, and contribute significant tax revenues that help our communities run. In large measure, Watkins Glen has prospered because of its thriving industrial sector and the private investments that boost our local economy.

Inergy is proposing such an investment: $40 million right here in Schuyler County. This is a significant opportunity for our community that will create jobs, generate tax revenues and help strengthen our local economy; which means our kids will have better schools and a better quality of life for our families and neighbors.

I have lived here my entire life. My wife Angie served in the Schuyler County Legislature for more than a decade. We care deeply about the safety of our family, neighbors and protecting the environment that we live in. We care about the future of the region.

Propane has been stored and transported safely in this region for more than 50 years. This project has been tested and reviewed by experts at New York State and Inergy. It’s nothing new.

As you may have heard, in recent weeks a group of opponents have become vocal in opposition to the proposed Finger Lakes LPG Storage project. I have been following this project for years, not weeks. That is why I am writing to encourage you to green light this project.

Sincerely,

Chris Franzese  
Owner, Villager Motel  
Watkins Glen, NY
April 29, 2013

Dear DEC Commissioner Martens,

I am writing to ask New York’s Department of Environmental Conservation to reject Inergy Midstream’s proposal to store Liquefied Petroleum Gas and expand natural gas storage at facilities on the shore of Seneca Lake in Reading, NY. The proposals threaten the health and well-being of residents throughout the region. Specifically:

- There has been almost no documentation of the project’s safety. Inergy Midstream has failed to show that the toxic contents of the cavern will not migrate into groundwater or into Seneca Lake — a drinking water source for more than 100,000 people.

- The facility will release toxic air pollution, as will emissions from diesel trucks, and put the health of nearby residents at risk.

- Similar facilities have seen catastrophic accidents including storage cavern collapses and explosions such as in Hutchinson, KS and Mont Belvieu, TX.

- Accidents, explosions, spills, and other issues would pose devastating impacts to the region as a whole.

- The facility and associated heavy industrial activity will undermine the region’s tourism-based economy and property values.
- Inergy Midstream has a history of water quality violations at the site and has already had two brine spills.
- Inergy Midstream has performed grossly inadequate scientific reviews, and has refused to make public a critical study of the project’s safety.

These proposed projects threaten to jeopardize one of the largest sources of freshwater in the United States, threaten the health of countless residents, and threaten to devastate the vitality of the entire region.

Commissioner Martens, do not put homes, families, local economy, and one of our most treasured natural environments at risk. As a lifelong steward of New York and open spaces, do not allow the destruction of Seneca Lake on your watch.

Sincerely,

Susan Thornton, Ph.D.
Dear DEC Commissioner Martens,

This month the Yahoo travel guide online list of 10 lakeside vacation spots that “have it all” includes the New York State Finger Lakes, along with Italy’s Lake Como, Switzerland’s Lake Geneva, Canada’s Lake Louise and Ireland’s Killarney lakes.

The travel entry promotes the wineries, among other attractions. “We are proud to have their natural beauty recognized on an international scale,” Gov. Andrew Cuomo said in a statement announcing the designation.

In light of this international recognition of the beauty of this area and its potential for tourism, I am writing to ask New York’s Department of Environmental Conservation to reject Inergy Midstream’s proposal to store Liquefied Petroleum Gas and expand natural gas storage at facilities on the shore of Seneca Lake in Reading, NY.

An industrial development of the size and scope that Inergy Midstream plans brings significant risk to the natural beauty of the Finger Lakes and its tourism industry.

In addition:
- There has been almost no documentation of the project’s safety. Inergy Midstream has failed to show that the toxic contents of the cavern will not migrate into groundwater or into Seneca Lake — a drinking water source for more than 100,000 people.
- The facility will release toxic air pollution, as will emissions from diesel trucks, and put the health of nearby residents at risk.
- Similar facilities have seen catastrophic accidents including storage cavern collapses and explosions such as in Hutchinson, KS and Mont Belvieu, TX.
- Accidents, explosions, spills, and other issues would pose devastating impacts to the region as a whole.
As already noted, the facility and associated heavy industrial activity will undermine the region’s tourism-based economy and property values.

- Inergy Midstream has a history of water quality violations at the site and has already had two brine spills.

- Inergy Midstream has performed grossly inadequate scientific reviews, and has refused to make public a critical study of the project’s safety.

These proposed projects threaten to devastate the vitality of the entire region.

Commissioner Martens, do not put homes, families, local economy, and one of our most treasured natural environments at risk. As a lifelong steward of New York and open spaces, do not allow the destruction of Seneca Lake on your watch.

Sincerely,

Susan Thornton, Ph.D.
From: tasayco maria luisa <mtj@figueirido.net>
To: <commissioner@gw.dec.state.ny.us>
Date: 12:09 PM 4/30/13
Subject: mltj@figueirido.net

Date of Correspondence 04/30/13

tasayco maria luisa
116 Pinehurst Ave H43
New York NY, 10033

Organization: City College of New York
Email: mltj@figueirido.net
Email received from Website: Commissioner Joe Martens,

I just learnt about another creative and risky way in which a company like Inergy have drilled another gas storage facility on Seneca Lake.
It is not enough that Inergy has already violated the clean water act by dumping excess effluent discharge into Seneca four times a year for 3 years and that there are records of at least 10 catastrophic accidents resulting from using salt caverns for gas storage. Moreover, there are reports of collapses in the caverns used for storage in Seneca lake.

Moreover, it is shameful to learn that the citizens from Seneca like Dr. Steingraber have to use civil disobedience to open the public eye on the threat posed by Inergy on the public health and safety in Seneca lake.

I strongly urge you to ban the use of salt caverns for gas storage in Seneca lake and in NYS because that practice endangers the water, air, and soil of NYS.

Thank you

Maria Luisa Tasayco, PhD
Emerita Professor of Chemistry/Biochemistry from CCNY and The Graduate Center of CUNY
email: mltj@figueirido.net
Dear Commissioner Martens:

This letter concerns the environmental assessment of the Seneca Lake gas storage project.

"Accidents Happen" isn't a homespun cliché, nor is it from a movie screenplay: it exists in reality and it is our experience. From the Challenger Space Shuttle, to the Exxon Valdes, to the Deep Water Horizon, to Duke Energy's Moss Bluff Texas, to the LPG rail explosion in Viareggio Italy, to West Texas, and to the gas pipeline spills and explosions too numerous to mention here...

"Accidents Happen".

The size and location of the proposed Arlington Storage Company LLC natural gas storage facility means that, in addition to the severe construction and operational negative impacts this project will have on the existing economic, physical and social environments, consideration of an accident's impact must be taken into account.

As a resident of the Finger Lakes, I'm aware of the unique importance of Lake Seneca and Watkins Glen to the region. This project represents a dagger into the heart of the Finger Lakes. Why? The area contains sustainable businesses that required decades to achieve their present level. Principal among these are the interdependent wine and tourist industries with many businesses related to these. The entire local and regional economy and the lives that depend on that economy rest on the physical beauty of the landscape, the good water of Lake Seneca and the concomitant peaceful rural environment: not a 24/7/365 industrial hub.

There is absolutely no space in this environment for an accident of the proportions that could arise from a) equipment failure within the proposed Arlington facility and the pipelines feeding it, b) human operational error or disgruntled employee damage, c) leakage through faults and structural deficits within and in the immediate area of the cavern, and d) interaction with an explosion and or leakage from its nearby neighbor, the proposed Inergy Midstream LLC storage facility. Unfortunately, it appears that the mixture of natural gas with 5 to 15% air to achieve explosive conditions is possible in the proposed facility at this location.
The industry hand-waiving assurances aren't good enough. Their lack of insurable responsibility and their lack of a capital fund in case of damage point to an oft-repeated scenario that this environment simply can't endure; i.e. a) destruction of life, property and local economy, b) denial of responsibility, c) decades of legal battles, d) fines which cannot and do not restore. The Finger Lakes isn't "For Sale".

It's my understanding that although the Federal Energy Regulatory Commission and the DEC usually take a very narrow and focused view of projects they assess, there must be an understanding that approving parts of projects that are legally distinct but fundamentally related in business and physical proximity will result in these regulatory agencies being forced, in a de facto way, to approve the larger, overall project. This proposed storage facility, in itself, and as part of the industrialization it will surely invite (fertilizer and gas dependent chemical plants) will destroy the existing working environment and population.

Please do not approve the application for this storage facility.

Thank you,

Ross M. Horowitz
820 W King Rd.
Ithaca, NY 14850
rossmhorowitz@gmail.com