

Factsheet on issues being considered in today's hearing

Dominion Energy is asking Maryland regulators' permission to emit far more pollution from its gas export facility in Cove Point.

The Cove Point facility requires the construction of an energy-intensive plant on site to liquefy and cool fracked gas before shipping it to other countries. In granting Dominion its permit in 2014 to construct this power plant, the Maryland Public Service Commission (PSC) conceded that the export terminal would not benefit state residents, so it required Dominion to contribute \$48 million to programs that would "advance and protect" the environmental and economic interests of Marylanders.

Now, Dominion wants the PSC to amend its original approval and give the company permission to inflict more harm on Cove Point and its neighbors. Dominion has a long track record of asking for one thing, then asking for more once it builds the first thing. It's a dishonest way of doing business, and the PSC shouldn't allow it.

Dominion is asking for two things:

1) to use additional generators to help supply power to its fracked gas export terminal and liquefaction facility in Cove Point; and

2) to throw out numeric monitoring of its emission of volatile organic compounds (VOCs).

Dominion is currently restricted by its PSC permit to emit no more than 2.53 tons of VOCs per year. In one fell swoop, Dominion is saying it now plans to emit 20.1 tons of VOCs per year, and the company is asking to no longer be restricted to stay within any numeric limit at all for VOC emissions.

Vast Increase In components:

Dominion is permitted to emit 2.53 tons/year of VOCs based on claiming the project would have 15,000 components (valves, gauges, fittings, inspection ports and connections). Now, it's saying there are 162,700 such components, more than half of which would likely leak and emit an estimated 20.1 tons/year of VOCs.

Because of the magnitude of its initial estimating error, Dominion lacks credibility in its commitment to manage VOC emissions. Since Dominion made such a large fundamental error in estimating the number of components in its initial filing, the PSC can have no confidence in Dominion's competence for managing fugitive VOC emissions and should not consider granting Dominion's request.

LDAR is a delayed repair program:

Instead of having its VOC emissions held to a numeric limit, Dominion wants to use "leak detection and repair (LDAR)," which is a delayed repair program. That means when a leak is detected and Dominion deems it is advantageous to delay the repair, those components can continue to leak or spew VOCs, greenhouse gases and toxic air pollutants until Dominion gets around to fixing the leak on its own schedule.

The time it takes to detect a leak and repair any one or all of the 88,700 potentially leaky points could be catastrophic to human health if there is no measurement of volume. Eliminating numeric limits would violate the PSC's mission to protect the health and safety of Marylanders.

Health Impacts of VOCs:

VOCs are volatile chemical compounds that can combine with other chemicals in the atmosphere to form compounds dangerous to human health. VOCs are known carcinogens, and increased VOCs worsen ozone quality. Calvert County's ozone levels are already bad, receiving an "F" grade.

Health effects from VOCs can include loss of coordination, nausea, and damage to the liver, kidney and central nervous system. Even at low levels, breathing ozone can cause chest pains, coughing and throat irritation. Increased ozone can also aggravate lung diseases like emphysema, bronchitis and asthma. Exposure to ozone is associated with increased numbers of premature deaths. Ozone pollution is particularly dangerous for children and those who are exercising outdoors, such as during school sports and recreation.

Close proximity to population:

This facility is being built in the most populated part in Calvert County. More than 20,000 people live in the Lusby area. Within a two-mile radius of the facility, there are 2,365 homes, 19 in-home daycare centers and two elementary schools. Homes are as close as across the street. Southern Calvert County's primary sports and recreation fields are immediately adjacent to the facility.

This project was permitted in part because Dominion grossly misrepresented the population here. Dominion told regulators that 4,906 people live between Solomons Island and Prince Frederick, completely leaving out the population of Lusby and many other locales. In truth, there are 44,638 people in this area as of the last census.

Previous fines and omissions:

In 2015, Dominion was cited by the Environmental Protection Agency and fined hundreds of thousands of dollars for failing to report 27 separate excessive releases of ammonia from this facility in 2012 and 2013.

Precedent for other facilities:

Removing a numeric limit on VOC emissions would not only allow far more pollution to enter our air and have a serious negative impact on the health of the surrounding community, especially the children, it sets a precedent that could lead to increased emissions from other gas infrastructure projects and sets back efforts to keep pollution capped at specific thresholds.

PSC approval of the Dominion request would reward either engineering malfeasance or corporate dishonesty, whichever is at the root of this application. Approval of this request would send a signal to every gas-processing company requesting a PSC permit that it does not have to worry about making significant errors in its estimates of pollution emanations because it can correct them, without penalty, after PSC approval. This would open the door for gaming all future permit applications.

What we recommend:

Instead of eliminating VOC emission limits, the PSC should be pushing to improve the accuracy of the measurement technology. To protect public health, we must retain pollution limits and require confirmation of compliance by monitoring actual emission levels.

Given the poor air quality throughout Maryland and current improvements in technology, we urge the PSC to deny Dominion's request for an amendment to its permit, and instead to require stricter independent and transparent monitoring of emissions from fossil fuel facilities in the state. The benefits of improving air standards in Maryland will have a long-term impact of improving the health of everyone in our region and tremendous savings on health care expenses.

For more information, or to get involved with efforts to restrict the harm Dominion and similar companies have on our communities, visit www.WeAreCovePoint.org.