

Public Comment Guide

Moriah Energy Center: Air Permit Public Hearing

What is the Moriah Energy Center?

Dominion Energy has proposed a liquified natural gas (LNG) storage facility in Person County, near the borders of Durham and Graham counties, called the Moriah Energy Center (MEC).

Background information

- The MEC would initially store 25 million gallons of liquified natural gas, with plans to construct a second storage tank in the future to double its capacity.
- The proposed site of the MEC is hundreds of feet away from private homes and near a number of water bodies that are home to threatened aquatic species.
- The MEC would consist of two liquefaction units that would be powered by gas combustion, which would produce air pollution.
- If built, the MEC would only provide up to 12 full-time jobs, none of which are guaranteed to go to Person County residents.
- This facility is being proposed amidst a larger planned expansion of methane gas infrastructure in North Carolina, including multiple new gas pipelines and power plants.
- Dominion Energy is already polluting the community. During the pre-construction phase, Dominion clearcut 70 acres of land, causing sediment pollution in creeks adjacent to the site and various neighbors' land.



Attend and Speak at the Air Permit Public Hearing

- The Division of Air Quality (DAQ)—part of the NC Department of Environmental Quality—is seeking input from the public on the draft air permit for the MEC.
- **If the DAQ approves this permit, Dominion will be permitted to begin construction of the MEC.**
- Your presence and comment at the public hearing are crucial in slowing down and stopping the MEC from being built!

MORIAH ENERGY CENTER AIR PERMIT PUBLIC HEARING

Thursday, August 1 @ 6PM
Vance–Granville Community College,
Civic Center Auditorium
200 Community College Road
Henderson, NC 27563

Speaking at a Public Hearing

Steps in preparing your comment

See talking points on page 7

1

Identify who you are and why the Moriah Energy Center is relevant to you

- Identify if you live near the proposed MEC/in Person County.
- OPTIONAL - If you have any formal expertise or training that is relevant to the subject matter you are speaking on, include your professional credentials, area of expertise, and years in the field.
- OPTIONAL - Do you own or operate a business in Person County or North Carolina? Do you hold any formal or informal community leadership roles (e.g. faith community leader, local government official, etc.)? You can also speak to how the MEC would impact you in these roles.

2

State what decision you want the Division of Air Quality (DAQ) to make

- For example, “I request that you deny the Moriah Energy Center Draft Air Quality Permit.”

3

Discuss your concerns with the air permit

- Clearly state what changes you’d like to see to the air permit and what your requests for the DAQ are
- Check that your talking points are organized in a way that’s easy to follow.
- **Tip: Since there are many talking points to draw from, coordinate with a buddy to cover different points from each other.*

Steps in preparing your comment

4

Speak to your experience and/or expertise

If applicable, weave in how your concerns relate to your personal experience. Providing facts plus appealing to emotions and ideals makes for a strong comment.

- How do you see yourself and your community being impacted?
- How would the safety and security risks impact you?
- How would air pollution and worsening climate change affect you?

5

Back yourself up

- If you include statements that aren't directly speaking to your personal experience, feel free to include supporting evidence, facts, and sources (such as scientific articles, reports, news articles, etc.), to back yourself up.

6

Restate what decision you want the DAQ to make

- If you have time, concisely restate other asks you made earlier in your comment regarding the changes you want to see in the permit.

Public Comment Checklist

- Is everything in your comment relevant to the air permit?
- Is your comment clearly organized and easy to follow?
- If applicable, did you connect your concerns to your personal experience and/or expertise?
- Do you clearly state your requests to the DAQ?
- Is the tone respectful?
- Is your comment **3 minutes or less**?
Longer comments can be shared in writing at the hearing, but your verbal comment time will likely be limited.

At the Public Hearing

- There will likely be a time limit for your verbal comment (typically **3 minutes**). They will state when your time is up.
- If possible, bring a written copy of your comment
 - If you run out of time while speaking, you can submit a written copy at the hearing for your full comment to be considered
 - Submit your longer written comment when you go up to speak
- Arrive early—the hearing is scheduled to start promptly at 6 p.m.
- At the hearing, you'll sign-up on a sheet to give a comment. Folks will be called on to give their comment in the order they signed up.
- You won't be able to ask the DAQ any questions at the hearing.

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**If you can't attend the hearing,
you can still submit a comment!**

3 ways to submit a comment:

- **Email** your comments to DAQ.publiccomments@deq.nc.gov with the subject line "Moriah-Energy.23A"
- **Leave a voicemail** at (919) 707-8726
- **Mail** your comments to: NCDEQ Division of Air Quality, 1628 Mail Service Center, Raleigh, North Carolina 27699-1628

**You can submit more than one comment*

Email Juhi Modi with Appalachian Voices at juhi@appvoices.org if you have any questions or want support writing or submitting your public comment.

Talking points

Feel free to use these in your comment

OVERARCHING ASK: We request the NC Division of Air Quality (DAQ) to deny the Moriah Energy Center Draft Air Quality Permit.

A. The Moriah Energy Center (MEC) would pose significant security and safety concerns for the community and the surrounding region.

- Dominion refuses to use common-sense safety features, like the use of leak detection and repair (LDAR) and doubled wall tanks. When asked about safety concerns, Dominion has routinely told us to take their word that there will be no accidents.
- Risk Management Plan - Dominion has argued that they should not be required to create a Risk Management Plan (RMP). They justify this by arguing that they are not a stationary source and that Department of Transportation regulations supersede the need for an RMP. We question this rationale and are worried that Dominion does not have a plan in the case of a spill, explosion or fire at the facility.
 - A similar liquified natural gas facility exploded in Washington State in 2014, leading to evacuation of the nearby community and over \$70 million in damage.¹
- These safety issues are especially concerning given that the MEC would be sited in a rural area with no cell service and limited internet service. Community members have already experienced having to wait 20-40 minutes during the pre-construction phase, as trucks block two-lane roads around the facility. This has raised concerns about access in and out of the surrounding area if an accident were to occur.
- Dominion Energy's safety record is concerning. At other facilities, Dominion has violated the terms of their air permits and released hundreds of thousands of pounds of air pollutants, according to EPA's Toxic Release Inventory.
 - In 2022, a Dominion facility in Chesterfield, VA emitted over 180,000 pounds of pollution beyond their permitted limits due to accidents.²

Ask: We request that the DAQ require Dominion Energy to implement safety features that would reduce the chance of a significant leak or explosion. These include, but are not limited to:

- Creation of a public Risk Management Plan
- Use of double-walled tanks
- Implementation of a formal leak detection and repair (LDAR) program

Talking points (*continued*)

B. Hazardous air pollutant emissions from the MEC pose significant health risks to the surrounding community. Dominion’s air modeling shows that 1-hour concentrations for acrolein and formaldehyde are much higher than the inhalation reference concentrations for those pollutants. Additionally, their modeled formaldehyde concentrations are 77% of the acceptable ambient level, a health-based standard set by the state.

- We suspect the actual concentrations of these hazardous air pollutants will be much higher. The majority of formaldehyde comes from secondary formation not included in Dominion’s modeling.³
- Additionally, researchers are increasingly finding that modeled concentrations underestimate ambient measurements.
 - Across the country in locations with air monitors available for comparison, the median acrolein measurements are 26 times higher than model estimates, and formaldehyde measurements are twice as high as model predictions.
 - In North Carolina specifically, where data is only available from rural sites, the measured formaldehyde concentrations are 1.4 to 1.8 times higher than the modeled estimates.
- Dominion staff have told us that there will be “no negative health impacts” from the MEC, despite having no public health review for this facility.

Ask: We request independent, third-party review of Dominion’s air quality modeling. We also request analysis of public health impacts of the facility, as required by Section 10 of Executive Order (EO) 292, which requires each cabinet agency, including DAQ, to consider public health impacts in permitting decisions.

Ask: We request that this air quality modeling model the 1-hour maximum and average concentration for hazardous air pollutants, such as acrolein and formaldehyde. We also ask that this modeling include formaldehyde precursors.

C. The surrounding community has no data on air quality, so it has to rely on Dominion’s calculated emissions, which are likely significantly underestimated. There is no state monitoring for the pollutants of concern nearby, and Dominion refuses to fund independent air monitoring to understand true concentration levels.

Ask: We request that the DAQ require Dominion Energy to pay for independent, third-party monitoring of formaldehyde and nitrogen dioxide around the fenceline and near surrounding community members’ homes. We request that mobile formaldehyde monitoring be done before facility construction begins and after the facility is operational. We ask that Dominion fund continuous monitoring of National Ambient Air Quality Standards (NAAQS) pollutants around the facility.

Talking points (*continued*)

D. Dominion’s siting of this facility constitutes an environmental justice issue.

Dominion states that the MEC is being built to enhance reliability for surrounding, more affluent counties like Durham, Orange and Wake Counties. Dominion chose to site it on the edge of Person County where they knew they could operate cheaply with less regulatory oversight. Person County is disproportionately vulnerable to climate impacts compared to Durham, Orange and Wake Counties. We believe this constitutes an environmental and climate justice issue.

The Environmental Defense Fund’s Climate Vulnerability Index (CVI) shows that Person County is over 3 times as vulnerable to climate impacts than Durham County, more than 5 times as vulnerable than Orange County and over 6 times more vulnerable than Wake County.⁴ The CVI is a forward-facing tool, looking at how communities will be harmed by climate change in the future unless we act now to curb climate change.

Climate Vulnerability Index Category	Person County (percentile)	Orange County (percentile)	Durham County (percentile)	Wake County (percentile)
Overall Climate Vulnerability	79th	15th	25th	13th
Economic and Productivity Losses Related to Climate Change	82nd	58th	49th	29th
Expected Annual Loss of Agricultural Value caused by Climate Change	81st	29th	16th	25th

Table 1. National vulnerability percentile between counties for several key climate indicators

Ask: We request that the DAQ conduct a formal environmental justice review of the Moriah Energy Center. While the DAQ initially determined that the immediate area around the proposed MEC site did not meet their criteria for an environmental justice review, we believe that the analysis is necessary given Person County’s disproportionate vulnerability to climate change impacts.

Talking points (*continued*)

E. Methane gas will not keep the lights on. Dominion has purported that the MEC is necessary to improve reliability of the energy grid during periods of extreme cold weather. In reality, methane gas routinely fails during winter storms at rates higher than renewable energy sources.⁵ The failure of methane gas plants during Winter Storm Elliot in December 2022 led to over 500,000 North Carolina residents without power during freezing temperatures. Methane gas plant malfunctions accounted for 63% of lost power across the Eastern U.S., while wind and solar were responsible only for 1% and 4%, respectively.⁶

Ask: We request that DAQ reject the Moriah Energy Center's Draft Air Permit because constructing this facility will further our dependence on methane gas and in turn jeopardize the reliability of our energy system.

F. This facility is not in the public interest of Person County. Only 7.6% of Person County residents use methane gas to heat their homes, so only a small portion of the county would potentially benefit from this facility.⁷

Ask: We request that the DAQ reject the Moriah Energy Center's Draft Air Permit, as it will not benefit the local community.

Sources

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2. "Dominion Energy," FencelineData.org, <https://fencelinedata.org/companies/9ac539ff-498a-4233-b152-1cf7b77c9bb8>
3. Ari Phillips, "Formaldehyde Air Pollution in Houston," *One Breath Partnership*, July 1, 2021, <https://int.nyt.com/data/documenttools/2021-houston-formaldehyde-report-final-2021/51dcffdd0bcc17c0/full.pdf>
4. "The U.S. Climate Vulnerability Index," *Environmental Defense Fund and Texas A&M University*, https://map.climatevulnerabilityindex.org/map/cvi_overall/usa?mapBoundaries=Tract&mapFilter=0&reportBoundaries=Tract&geoContext=State
5. Paul Arbaje and Mark Specht, "Gas Malfunction: Calling into Question the Reliability of Gas Power Plants," *Union of Concerned Scientists*, January 9, 2024, <https://www.ucsusa.org/resources/gas-malfunction#:~:text=Gas%20plant%20operations%20are%20particularly,when%20people%20most%20need%20electricity>
6. "Presentation | FERC-NERC-Regional Entity Joint Inquiry Into Winter Storm Elliott," *Federal Energy Regulatory Commission*, September 21, 2023, <https://www.ferc.gov/news-events/news/presentation-ferc-nerc-regional-entity-joint-inquiry-winter-storm-elliott>
7. Discussion with Dominion staff on 10/30/23 and 4/11/2024