

The Albany Compressor Station is Located in an Environmental Justice Community

According to U.S. Census data, 73.5% of the population of Albany, Georgia is “Black or African American alone.”⁵ The community directly surrounding the Albany compressor station site is likewise predominantly African American. Specifically, 84% of the residents within a half-mile radius of the site are African American, as are 82% of the residents within a one-mile radius. Comments on Draft EIS for the Southeast Market Pipelines Project (Accession No. 20151027-5089) at 28-29. *See also Sierra Club v. FERC*, 867 F.3d 1357, 1370 (D.C. Cir. 2017) (“The neighborhood in question is a 100% African American census block.”). Accordingly, African Americans will “bear a disproportionate share of the negative environmental consequences resulting from” operation of the Albany compressor station. U.S. Environmental Protection Agency, *Final Guidance for Incorporating Environmental Justice Concerns in EPA’s NEPA Compliance Analyses*, § 1.1.1 (1998) (“EPA Guidance”).

Compressor Stations Emit Harmful Air Pollutants that Cause Respiratory Problems

Compressor stations emit air pollutants known to cause serious adverse effects including respiratory problems, lung damage, and premature death. FERC has “recognized that pollutants from compressor stations ‘are known to increase the effects of asthma and may increase the risk of lung cancer.’” *Friends of Buckingham v. State Air Pollution Control Bd.*, 947 F.3d 68, 85 (4th Cir. 2020).

According to FERC, the Albany compressor station has the potential to emit 9.14 tons/year of particulate matter (PM₁₀/PM_{2.5}), 46.77 tons/year of nitrogen oxides (NO_x), and 57.8 tons/year of volatile organic compounds (VOCs). Sabal Trail Final EIS (Accession No. 20151218-4001) at 3-257. EPA has linked particulate matter “to a variety of problems, including: premature death in people with heart or lung disease; nonfatal heart attacks; irregular heartbeat; aggravated asthma; decreased lung function; [and] increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing.”⁶ Short-term exposure to nitrogen oxides can trigger asthma attacks, and may be related to chronic obstructive pulmonary disease and other respiratory diseases.⁷ Ozone, which forms by a reaction between NO_x and VOCs, can result in “respiratory symptoms, reduced lung function, and airway inflammation, as well as more serious effects such as increased hospital admissions and increased daily mortality.”⁸

For ozone and particulate matter, there is no “threshold concentration below which these pollutants are known to be harmless.” *Am. Trucking Ass’n v. EPA*, 283 F.3d 355, 360 (D.C. Cir. 2002). Even when the national ambient air quality standards (NAAQS) are not violated as to particulate matter, exposure to PM_{2.5} increases the risk of asthma, heart attacks, and death. *Friends of Buckingham*, 947 F.3d at 92. Moreover, the NAAQS “address regional air quality concerns... [but] do not adequately assess risk to human health for residents living in close proximity to

⁵ <https://www.census.gov/quickfacts/fact/table/albanycitygeorgia/RHI225218#RHI225218>

⁶ EPA, *Health and Environmental Effects of Particulate Matter (PM)*, <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulatematter-pm>.

⁷ EPA, *Integrated Science Assessment for Oxides of Nitrogen Health Criteria*, lxxxiii (2016).

⁸ EPA, *Ozone Pollution and Your Patients’ Health*, <https://www.epa.gov/ozone-pollution-and-your-patients-health/course-outlineand-key-points-ozone>.