



Seneca Lake Pure Waters Association

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October 3, 2011

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo,

In September 2009 Inergy, a Kansas City based company proposed a \$40 million project to expand the storage and distribution of propane and butane on a 576 acre site near Routes 14 and 14A, north of Watkins Glen. The proposal is to use existing salt caverns with a capacity of 88.2 million gallons to store LPG. The caverns currently are filled with salt brine. The LPG would displace the salt brine which would be stored in a 14 acre lined surface pond above Seneca Lake. As LPG is withdrawn the stored brine from the pond would be used to displace the LPG in the cavern. Inergy has also announced plans for a transfer station to transport propane and butane by truck from the site and butane by rail. Since Feb. 2010 the NYS DEC has been in charge of the State Environmental Quality Review (SEQR).

Seneca Lake Pure Waters Association has provided the attached comments regarding the proposed LPG storage facility by the Finger Lakes LPG Storage LLC in Watkins Glen, New York. Our comments were in response to a request by the NYSDEC for public comments in regards to the Draft Supplemental Environmental Impact Statement (DSEIS) submitted for this project (DEC 8-4432-00085/00001 issued August 1, 2011. Our Association represents over 400 member residents within the Seneca Lake watershed.

As stated in the attached documents we have the following primary concerns regarding Seneca Lake:

1. We are 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.
2. We are concerned about the environmental safety of Seneca Lake in regards to catastrophic failure of the proposed brine pond above Seneca Lake.

In addition, while outside of our association's mission as the "Voice of Seneca Lake", SLPWA believes that the DEC should give consideration to three other issues related to the proposal by Inergy.

1. An independent 3rd 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.

2. A study to evaluate the social-economic impact of the project on the already established and growing tourism and wine industry of the region. Risking the vitality of this growth in an area that has faced economic uncertainty in the past maybe misguided.
3. The ability of first responders (police, fire and rescue teams and medical facilities) to cope with an emergency at the proposed facilities should not be overlooked and properly funded by Inergy, prior to approval for construction.

Seneca Lake Pure Waters Association strongly recommends that the SEIS Scoping Outline include additional geological assessment of these salt caverns to assure that the proposed facility can be used safely for the long term storage of LPG. We also urge the DEC to require Inergy to look for a more environmentally suitable location for the brine pond that would protect Seneca Lake from a catastrophic failure.

Sincerely,

Phil Cianciotto
President, Seneca Lake Pure Waters Association

cc.

NYS Lt. Governor Robert J. Duffy
NYS DEC Commissioner Joe Martens
NYS Attorney General Eric T. Schneiderman
NYS Assemblyman Brian M. Kolb
NYS Assemblyman Christopher S. Friend
NYS Assemblyman Philip A. Palmesano
NYS Senator Michael F. Nozzolio
NYS Senator Thomas O'Mara
US EPA Region 2 Administrator Judith A. Enck
Village Board of Watkins Glen, NY
Town Board of Reading, NY