### **ISSUE BRIEF • JUNE 2021**



IMAGE COURTESY OF U.S. LIBRARY OF CONGRESS

# **Natural Gas Liquids:** Fracking's Hazardous Plastics and Pollution Scheme

The deluge of fracked natural gas has unleashed a dangerous buildout of wells, storage facilities and pipelines, worsening climate change and spreading a toxic web of pollution throughout the United States. As companies have looked for ways to absorb the excess natural gas, hedge against an electrified future and ensure fossil fuel dependence, they have turned to reliable moneymakers: a fracking byproduct known as natural gas liquids (NGLs), and the petrochemical facilities that rely on it. But a petrochemicals buildout fueled by NGLs means more plastic and more pollution — and a step backward for climate at a time when we should be taking the most aggressive action.

## **Key findings**

• The natural gas glut is fueling increased NGL exports and more unnecessary petrochemical and plastics facilities. The United States is now the biggest global producer of NGLs. NGL production grew nearly threefold between 2007 and 2019 as fracking took off, while prices for NGLs plummeted 66 percent. Likewise, the real wholesale price for natural gas fell 62 percent as total production rose. This glut has led companies to rely on petrochemical manufacturing and NGL exports to spur increased demand and domestic production. Over the past five years, from 2015 to 2020, U.S. NGL exports increased 117 percent.

 The cheap oversupply of NGLs has led to an infrastructure buildout frenzy, especially in wet gas-rich areas like Appalachia. Over the past 10 years, oil and gas and chemical companies have committed to spending at least \$200 billion on shale gas, with nearly 350 gas-dependent chemical plants in the works across the United States. For example, the proposed Appalachian



### foodandwaterwatch.org

Storage and Trading Hub would create a multibillion dollar natural gas storage complex and an associated network of gas pipelines designed to capitalize on the region's shale gas to supply chemical and plastics inputs for manufacturing plants.

- NGLs and NGL infrastructure are notoriously dangerous to public health and safety. NGLs are "extremely flammable" and typically odorless, making leaks from infrastructure easily undetected. Unlike natural gas, NGLs usually do not have a sulfur-based odorant added to them for leak detection. Many NGL pipelines are not federally regulated, and there is no federal siting or permitting process for these pipelines. Moreover, NGL storage facilities can leak, erupt into flames or form sinkholes, and petrochemical facilities can explode.
- Petrochemical plants are disproportionately sited in or near low-income communities and communities of color. The petrochemical plant-laden "Cancer Alley" region between New Orleans and Baton Rouge along the Mississippi River has been polluted for decades; in general, areas that are home to more communities of color have some of the worst air in the country. The petrochemical building boom in the Upper Ohio River Valley is taking place alongside a wide range of other industrial polluters in vulnerable communities.

## The Natural Gas Liquids Bonanza

Over the past decade, the U.S. fossil fuel industry has surged by employing new techniques and technologies that combine horizontal drilling and hydraulic fracturing (or fracking) to extract oil and gas from shale rock formations. This boom in lowpriced natural gas and natural gas liquids (NGLs) has spawned a resurgence in North American petrochemical and plastics manufacturing — and the pollution that comes with it.<sup>1</sup>

Natural gas is mostly methane, but some reserves contain other hydrocarbons called NGLs, which include ethane, a raw material used to manufacture and produce finished petrochemicals such as plastics.<sup>2</sup> "Wet" natural gas reserves, like the Utica and Marcellus shale formations under Ohio, Pennsylvania and West Virginia, contain higher concentrations of these NGLs.<sup>3</sup> NGLs are often confused with liquefied natural gas (LNG) due to their similar acronyms, but they are in fact quite different. LNG is the supercooled form of dry natural gas (methane), which allows it to take the form of liquid, making it easier to transport.<sup>4</sup>

The fracking boom has enabled the development of more petrochemical facilities, like ethane or ethylene crackers, that utilize NGLs — locking in the demand for natural gas and increasing dangerous pipeline infrastructure, toxic air pollution, greenhouse gas emissions, plastics pollution and other public health threats.<sup>5</sup> Petrochemical manufacturing is the biggest consumer of NGLs, and 55 percent of this manufacturing goes toward the production of plastics and other products.<sup>6</sup>

Ethane is converted into ethylene to be used in manufacturing plastic. Other NGLs can be used in heating and cooking fuels (propane), transportation fuel blends (butane and pentane) and for energy recovery from some wells and oil sands.<sup>7</sup> Liquefied petroleum gas (LPG), a mixture of propane and butane, is used for heating, cooking and transportation purposes.<sup>8</sup> Recently, power plants have started experimenting with the use of ethane as a fuel blend with natural gas to produce electricity.<sup>9</sup>

The largest NGL hubs in the United States include Mont Belvieu, Texas and Conway, Kansas; in addition, a massive Appalachian Storage and Trading Hub is being promoted in the Pennsylvania, West Virginia and Ohio region.<sup>10</sup>

## NGLs Boost Petrochemicals and Plastics Growth

U.S. fracking has produced an oversupply of cheap gas and ethane in the past few years.<sup>11</sup> Collapsing prices undermined the profitability of oil and gas companies, but all that additional gas has been a boon to the U.S. plastics industry.<sup>12</sup> Due to low ethane costs in the early 2010s, chemical companies began aggressively investing in petrochemical plants and export facilities to capitalize on the ethane glut.<sup>13</sup> The United States is now the largest producer of NGLs globally, accounting for over a third of production.<sup>14</sup>

Persistently low prices have challenged the economic viability of the fracking industry's continuous and steady expansion. Between 2007 and 2019, the real wholesale price for natural gas fell 62 percent as total gas production rose (see Figure 1).<sup>15</sup> Likewise, NGL growth remained fairly steady until the fracking boom

took off around 2007; it then grew nearly threefold to 5 million barrels per day in 2019 (see Figure 2). During this same period, the NGL composite price plummeted 66 percent.<sup>16</sup> To prop up a flailing industry, low prices have propelled frackers into a symbiotic relationship with the petrochemical and plastics industries that use NGLs as manufacturing feedstock.

Over the last 10 years, oil and gas and chemical companies have committed to spending at least \$200 billion to squeeze North American shale for all it



#### FIG. 2: U.S. Natural Gas Liquids Production and Price

PRODUCTION IN MILLION BARRELS PER DAY, INFLATION ADJUSTED PRICE PER MILLION BRITISH THERMAL UNIT IN 2019



DATA SOURCE: U.S. Energy Information Administration

is worth.<sup>17</sup> Across the United States, nearly 350 chemical plants are in the pipeline, "representing oil companies' life-or-death bet on plastics as the future."<sup>18</sup>

Oil and gas companies also look to petrochemicals and plastics to hedge against the decline in demand for fossil fuels as they anticipate the growth in electric vehicles and the growing fight against climate change.<sup>19</sup> With transportation fuel consumption expected to peak at the end of the 2020s with the transition to electric vehicles, NGLs are seen as a safeguard for the oil and gas status quo.<sup>20</sup> ExxonMobil projects NGL consumption in the chemicals sector to double in the next 20 years and expects this to mitigate the reduced demand for oil and gas from the transition to electric vehicles.<sup>21</sup>

## **The NGL Buildout Frenzy**

The cheap oversupply of NGLs has led to a buildout frenzy. The number and capacity of gas processing plants, NGL pipelines, petrochemical facilities and other infrastructure have exploded in the past decade, particularly in wet gas-rich areas like the Appalachian region.<sup>22</sup> These projects have included at least three proposed or planned cracker plants in Ohio, Pennsylvania and West Virginia; the Appalachian Storage and Trading Hub; the controversial Mariner East and Falcon pipelines in Pennsylvania; and various underground storage facilities like the proposed Mountaineer NGL Storage facility in Monroe County, Ohio.  $^{\rm 23}$ 

The Trump administration ballyhooed the Appalachian region's natural gas and NGLs as engines for economic growth, dubbing the buildout a "renais-sance."<sup>24</sup> Ethane crackers are being proposed and built at breakneck speed to take advantage of cheap NGLs and to fill overseas demand.<sup>25</sup> IHS Markit and the American Chemistry Council estimate that Appalachian ethane could support around five to nine ethane cracker plants, including the Shell plant under construction in Beaver County, Pennsylvania.<sup>26</sup>

Low prices have increased the competitiveness of NGLs and U.S.-produced petrochemicals overseas due to their edge over heavier, more expensive oilbased feedstocks (i.e., naphtha) used by European and Asian producers.<sup>27</sup> From 2014 to 2020, U.S. NGL exports increased 117 percent (see Figure 3).<sup>28</sup> The glut has spurred the development of petrochemical plants, shipping terminals, storage facilities and upgrades both domestically and abroad to feed this international appetite,<sup>29</sup> and much of the new added capacity and production of NGLs and NGL-derivatives (i.e., ethylene and polyethylene) is set for abroad.<sup>30</sup> Petrochemicals and plastics producers also look to emerging markets where industry lobbyists are promoting greenwashing recycling programs and hamstringing attempts to limit plastics.<sup>31</sup>



DATA SOURCE: U.S. Energy Information Administration

In 2016, one of the first ethane export routes formed connecting Pennsylvania NGL production with European petrochemical manufacturing. The Europebound ethane is extracted by fracking in Pennsylvania and then carried via Sunoco's Mariner East pipeline to the Marcus Hook export facility near Philadelphia. From there, large vessels dubbed "dragon ships" carry the ethane to cracker plants in Norway and Scotland owned by Ineos, a European chemical company.<sup>32</sup> More recently, along the Houston Ship Channel, a new marine terminal joint venture between Enterprise Products Partners LP and Navigator Holdings Ltd. shipped its first ethylene cargo to Japan in early 2020. Enterprise is also developing two ethylene pipelines linking the hub in Mont Belvieu, Texas to the state's underground Markham storage hub.33

While investors rush to take advantage of the NGL gold rush, the economics justifying these projects can change unexpectedly due to circumstances such as plunging plastics prices, growing plastic pollution awareness, the coronavirus crisis and ballooning construction costs.<sup>34</sup> Banking on NGLs may have severe risks and ramifications for taxpayers and for local and state governments, which face an uncertain future in these assets.<sup>35</sup>

## **The Dangers of NGLs**

The boom in NGL processing and production has been accompanied by a litany of documented incidents, including explosions, fires, environmental degradation and fatalities, a side effect of their hazardous nature. NGLs are volatile and flammable, and because their presence in air can go undetected, they can be particularly dangerous.<sup>36</sup>

NGLs remain in liquid form under very high pressure or very cold temperatures, but under normal atmospheric conditions (i.e., those outside of a pipeline), they exist in an invisible gaseous state and are colorless and nearly odorless (ethane is odorless, whereas butane, propane and propylene have a slight petroleum odor, and ethylene has a sweet odor).<sup>37</sup>

When exposed to typical atmospheric conditions, the liquids vaporize into extremely flammable/ explosive gases.<sup>38</sup> As this happens, the gases can go undetected because they typically do not have a sulfur-based odorant added for pipeline leak detection.<sup>39</sup> According to the company that is building the Mariner East 2 pipeline: "The addition of odorant is not possible, given the potential end uses of the products such as textiles and plastics. This is one reason that the addition of odorants in transmission pipelines is not required by regulation."<sup>40</sup> In other words, there is concern that an odorant could cause plastic bottles to smell or taste like rotten eggs.

Unlike methane, which tends to migrate upward into the atmosphere when leaked, heavier NGLs stay close to the ground and disperse horizontally in a downwind fashion, creating vapor clouds.<sup>41</sup> These vapor clouds may disperse with no impact, or they could ignite and burn or explode, depending on their concentration in air, the amount released and other factors.<sup>42</sup> In some instances, electrical items as seemingly innocuous as a cell phone can ignite a pipeline leak.<sup>43</sup> Impacts from explosions can range from ruptured ear drums to fatality, as well as structural damage to surrounding buildings and danger to those inside.<sup>44</sup>

NGL-related accidents such as explosions and fires have been catastrophic over the years. In 2011, an inferno erupted at a Mont Belvieu Enterprise Partners NGL storage complex — the flames burned for hours and killed a plant worker.<sup>45</sup> In January 2015, a rupture in the ethane Appalachia-to-Texas (ATEX) pipeline led to an explosion that burned for hours in Brooke County, West Virginia.<sup>46</sup> A 2017 blast at an NGL pipeline station about 30 miles west of New Orleans resulted in a days-long inferno, causing the evacuation of 60 homes; one worker was hospitalized and another presumed dead.<sup>47</sup> In July 2020, an explosion occurred at an Energy Transfer NGL facility after a contractor hit a line carrying NGLs, resulting in a fire that lasted for over two hours.<sup>48</sup>

### **Poorly Regulated Pipelines**

NGL pipelines carry substantial safety risks. They are classified as hazardous liquid pipelines, which transport liquid hydrocarbon substances like crude oil, refined petroleum products and highly volatile liquids. Highly volatile liquids include NGLs, condensates and any other products that can form a vapor cloud when exposed to the atmosphere.<sup>49</sup> Pipelines are the most common and cheapest method of NGL transportation, moving more than 90 percent of all NGLs by volume. There are approximately 54,000 miles of documented NGL pipelines in the United States, designated for everything from purity products to downstream products like petrochemicals and fuel mixes.<sup>50</sup>

The Hazardous Liquids Pipeline Safety Act (1979) sets minimum nationwide safety standards for hazardous liquid pipelines.<sup>51</sup> The Pipeline and Hazardous Materials Safety Administration (PHMSA) is the primary agency that oversees and enforces pipeline safety, but the U.S. Environmental Protection Agency, the Coast Guard, the Occupational Safety and Health Administration and state agencies may also be involved with other safety concerns such as inspection, spill response, cleanup and worker safety – although oftentimes jurisdiction is unclear.<sup>52</sup> Federal standards and enforcement also apply to intrastate hazardous liquid pipelines unless a state chooses to assume those responsibilities instead.<sup>53</sup>

Despite this framework, many thousands of miles of pipelines remain unregulated and fall outside the scope of any federal and state oversight.<sup>54</sup> For instance, the PHMSA only regulates 4,000 miles out of an estimated 30,000 to 40,000 miles of onshore hazardous liquid gathering lines, and most states have chosen not to pick up the slack.<sup>55</sup> Moreover, there is no formal federal siting or permitting process for hazardous liquid pipelines; as a result, the process varies significantly from state to state.<sup>56</sup>

### **Mariner East 2: A Pipeline of Problems**

Since construction of Sunoco's Mariner East 2 pipeline began in 2017, accidents have been plaguing local communities and contaminating their water resources. This 350-mile project runs through densely populated communities, close to people's homes and schools, and there are no proper, publicly available safety plans for evacuations in place — all so that Appalachian NGLs can be transported to the Sunoco's Marcus Hook facility for export, including across the Atlantic Ocean for the manufacture of plastics in Europe.<sup>60</sup>

Sunoco has been hit with multiple fines and shutdown orders by state

regulators.<sup>61</sup> In September 2018, the Revolution pipeline — a natural gas gathering line that feeds into two other pipelines, including Mariner East 2 — was the site of an explosion that resulted in extensive property damage, evacuations, the closure of an interstate and an 11-month moratorium on construction permitting for the pipeline operator, Energy Transfer Partners. The explosion resulted in a \$30.6 million fine to Energy Transfer Partners (Sunoco's parent company), one of the largest ever issued by the state.<sup>62</sup>

Nationally, Sunoco has some of the highest numbers of self-reported incidents and federal enforcement actions over the years. According to a *StateImpact Pennsylvania* analysis of PHMSA data, Sunoco Pipeline reported 302 hazardous liquid pipeline incidents between 2006 and 2018. The company had the second-highest number of incidents out of more than 2,100 operators in the agency database, with over 1.2 million gallons spilled (and only half recovered) during the same period.<sup>63</sup>

Still, despite these violations and enforcement actions, the company has continued to harm surrounding communities; large sinkholes have opened up along the pipeline route, and around 140 industrial waste spills have polluted waterways and wetlands.<sup>64</sup> The Federal Bureau of Investigation (FBI), along with county and state prosecutors, is currently investigating if Pennsylvania Governor Tom Wolf's administration pressured environmental protection officials to issue construction permits for Mariner East 2.<sup>65</sup> Wolf has received over \$300,000 in campaign donations from the oil and gas industry, including contributions from Energy Transfer Partners, and members of his administration also have personal ties to the oil and gas industry.<sup>66</sup>



Mariner East 2 pipeline construction cuts through a suburban neighborhood in Uwchlan, Pennsylvania.

PHMSA data show that there have been 245 pipeline spills of NGLs and their derivatives over the past decade, resulting in around 10.2 million gallons being released into the environment, often without any remediation or assessment of long-term impacts. Costs related to property damage, emergency response and the environment total more than \$59 million.<sup>57</sup> These numbers may even be substantially higher, due to the consistent underreporting of spills.<sup>58</sup> For example, a 2015 NGL pipeline spill in western North Dakota was initially reported to be 10 gallons but later turned out to be at least 240,000 gallons (the amount recovered) and may have been as large as 11 million gallons, with an estimated cleanup timeframe of up to 15 years.<sup>59</sup>

### Storage

A combination of above- and below-ground facilities is used to store surplus NGLs.<sup>67</sup> These can involve above-ground tanks or underground salt, shale, granite or limestone formations that have been hollowed out to form caverns.<sup>68</sup>

In Appalachia, the proposed Appalachian Storage and Trading Hub would create a multi-billion dollar natural gas storage complex and associated network of gas pipelines designed to capitalize on the region's shale gas to supply chemical and plastics inputs for manufacturing plants.<sup>69</sup> The actual storage facility would be the region's cornerstone for the entire petrochemical development plan. It would hold up to 2 million gallons of ethane and other NGLs hundreds of thousands of feet underground in a geological salt formation between the Marcellus and Utica shale basins, and provide a steady stream of ethane to nearby crackers — acting as a trading post for fracking companies looking to sell their NGLs to petrochemical plants and plastics facilities.<sup>70</sup>

While underground storage locations like salt caverns are considered a safer way to store hydrocarbons, they are not without significant risk.<sup>71</sup> Underground storage increases the risk of sinkholes, which can lead to evacuation, property damage and lasting impacts on affected communities.<sup>72</sup> Leakage of stored NGLs can also harm local communities.

Awareness around fugitive NGL emissions and leaks from salt caverns has existed for decades.<sup>73</sup> NGL

leakage from underground storage can contaminate water resources and air, lead to dangerous explosions and displace communities.<sup>74</sup> NGLs have been leaking from caverns in Conway, Kansas since the mid-1950s, contaminating local groundwater and causing the relocation of 30 households in the 1980s. In March 2004, more than 100 tons of NGLs escaped from a salt cavern facility at the Huntsman Polymer site in Odessa, Texas.<sup>75</sup>

Structural flaws in underground cavern facilities, such as leaky well casings, can also result in the escape of NGL gases to the surface. Propane, ethylene and propylene can be especially dangerous because they are heavier than air and are flammable, which puts nearby neighborhoods at risk. Gas release incidents have resulted in home explosions and evacuations. Ethane leakage from a hydrocarbon storage cavern in Fort Saskatchewan, Alberta in 2001 resulted in the ethane catching fire. While the accident occurred above ground, it was exacerbated by the huge volume of ethane located in the underground cavern.<sup>76</sup>

### **Dangerous Contaminants**

Aside from NGLs, the NGL stream has many other dangerous substances. These include mercury, radioactive material and more.<sup>77</sup> Mercury is found in the raw natural gas stream and in NGL processing. Maintenance workers are often exposed to mercury vapors at concentrations above the legal limit during routine maintenance, and there is also potential for mercury accumulation in certain system processes and equipment.<sup>78</sup>

Moreover, radioactive material can contaminate natural gas and NGL processing. These contaminants include radon isotopes that occur naturally in the Earth's crust (known as naturally occurring radioactive material, or NORM) that decay into isotopes of radium, lead and polonium during the natural gas and NGL processing stream.<sup>79</sup> Due to the affinity that the radon isotopes have for natural gas, the radioactive contaminants migrate from the Earth's crust to the surface at the wellhead and can concentrate in NGL processing installations, storage tanks and pipelines.<sup>80</sup> Certain wet shale plays, like the Marcellus Shale, have higher levels of NORM than other fracking-intensive regions.<sup>81</sup> NORM that is present in NGL infrastructure like natural gas processing plants can occur at levels harmful to workers; it has been found to contaminate the surrounding environment and can present disposal challenges.<sup>82</sup>

## More NGLs Mean More Petrochemical Plants and Pollution

The scramble to develop NGLs and their associated infrastructure means more pollution and worsening environmental justice.

Plants that convert natural gas and NGLs into petrochemicals emit massive amounts of air and climate pollutants including polycyclic aromatic hydrocarbons, carbon dioxide, ozone-creating volatile organic compounds (VOCs, such as benzene and toluene) and nitrogen oxides.<sup>83</sup> These plants pump out mountains of toxic plastics that pile up in our landfills and oceans.<sup>84</sup>

The development of new petrochemical facilities, crackers and plastics plants will compound the existing pollution problems where the industry is expanding and spread it to new areas where projects are being developed. This pollution would worsen existing air quality and public health problems. The Gulf Coast has some of the highest pollution levels and pollution-related illnesses and diseases,<sup>85</sup> and the Tri-State region of Ohio, Pennsylvania and West Virginia already faces stark environmental and associated public health challenges from a century of industrial pollution.<sup>86</sup>

## **Environmental Justice, Health and Safety**

Like other industrial polluters, pipelines and petrochemical plants are often sited in or near predominantly low-income and Black communities, in areas that have long borne a disproportionate share of toxic air and dirty water. In Louisiana, the petrochemical plant-laden "Cancer Alley" region between New Orleans and Baton Rouge along the Mississippi River has been polluted for decades; in general, areas that are home to more communities of color have some of the worst air in the country.<sup>87</sup>

In the Tri-State area, where one of the biggest petrochemical building booms is taking place, a sprawling network of pipelines, underground storage facilities, petrochemical plants and plastics facilities, including a Shell ethane cracker plant and the Mariner East 2 pipeline, exist to soak up the natural gas glut in Appalachia.88 In this area — the Upper Ohio River Valley — the buildout is occurring alongside a wide range of other industrial polluters in vulnerable communities.<sup>89</sup> In 2015, people of color and low-income residents made up large portions of the population (10 percent and 17 percent, respectively) living within one mile of the more than 200 industrial facilities in the Upper Ohio Valley (excluding Allegheny County, Pennsylvania, where people of color made up 23 percent of the population near industrial facilities).90

Mont Belvieu, Texas, along the Houston Ship Channel in petrochemical alley, is the largest NGL hub in North America. With more than 240 million barrels of NGL storage capacity, the region contains multiple underground salt dome storage facilities and an extensive network of pipelines and fractionation facilities; it is also in close proximity to NGL end users, including petrochemical plants and oil refineries, and various modes of transportation – pipelines, rails, trucking and cargo vessels for domestic and international export.<sup>91</sup>



The Houston Ship Channel — a sprawling petrochemical, refinery and dirty energy exports complex in Texas — includes Mont Belvieu, the largest NGL hub in North America. IMAGE COURTESY OF U.S. LIBRARY OF CONGRESS

The region serves as a striking example of the environmental blight and menace to public health brought on by a petrochemical buildout, with frequent and sometimes fatal explosions, pipeline ruptures, groundwater contamination, frequent evacuations due to leaks and other dangerous industrial incidents since the 1950s.<sup>92</sup> The area has also seen high levels of air pollution like VOCs from petrochemical plants, resulting in dangerous ozone formation.<sup>93</sup>

NGLs also fall under the classification of VOCs, and their emissions can harm public health and the environment due to the formation of ground-level ozone. Since 2009, atmospheric concentrations of ethane and propane have increased in the Northern Hemisphere near oil and natural gas production regions, a reversal of three decades of reductions. These increases in emissions have also led to increases in ground-level ozone at levels in violation of air quality standards and harmful to human health near fracking-intensive areas.<sup>94</sup>

Prolonged contact with ground-level ozone is linked to asthma and chronic obstructive pulmonary disease. When mixed with particulate matter, which has been linked to various cancers, smog can form.<sup>95</sup> In addition to asthma, long-term exposure to smog has been connected to premature deaths in adults and to low birthweight in babies.<sup>96</sup> Further, chronic exposure to air pollution can cause various illnesses and impairments, including cognitive deficits.<sup>97</sup>

Several studies have demonstrated that people's exposure to petrochemical facility pollutants is associated with heightened cancer risks, acute irritative



symptoms (such as nausea and eye and throat irritation) and respiratory-related illnesses, especially for children.<sup>98</sup> Health burdens from these pollutants disproportionately impact people of color. Roughly 13.4 percent of Black children suffer from asthma, with a mortality rate of one in 1 million; in contrast, 7.3 percent of white children have asthma, and have a mortality rate of one in 10 million.<sup>99</sup>

NGLs and petrochemical infrastructure are also high risk when it comes to natural disasters.<sup>100</sup> With climate change worsening, extreme weather events like hurricanes and flooding may become even more common, in addition to NGL infrastructure accidents that result in fires or explosions or even loss of life.<sup>101</sup> When a storm makes landfall, facilities release extra pollutants when they shut down and later resume operations. In the wake of Hurricane Harvey in 2017, 46 facilities reported around 4.6 million pounds of airborne emissions that exceeded state limits; these plants included the Chevron Phillips chemical plant that released over 550,000 pounds and a Formosa Plastics plant that released 1.3 million pounds of excess emissions.<sup>102</sup>

Petrochemical plants have been the source of multiple fires and explosions over the years. In Pasadena, Texas in 1989, an NGL-derivative line or valve failed at a petrochemical complex, causing an explosion that killed 23 people and injured over 100.<sup>103</sup> In November 2019, 60,000 residents across four towns in southeast Texas were forced to evacuate after a butane derivative processing unit at a petrochemical plant in Port Neches exploded and spewed VOCs into the air. The accident was the fourth petrochemical infrastructure incident that year involving fires, which cumulatively resulted in one fatality and dozens of injuries.<sup>104</sup>

### **Conclusion and Recommendations**

The fracking boom and the resulting NGL and petrochemical gold rush has resulted in a blighted environmental landscape, worsening public health and proliferating plastic pollution. As fossil fuel corporations build NGL infrastructure at breakneck speed, health and safety regulations to safeguard those living near developments cannot keep pace. Now, more than ever, more people are being put at risk by the expansion of the petrochemical and plastics industry.

The expansion of drilling and fracking is associated with significant quality-of-life and public health problems and endangers society by worsening climate instability. This cheap and dirty fossil fuel is also proliferating its toxic legacy by facilitating the expansion of petrochemical plants, which are polluting and unsustainably producing materials that often end up in landfills. Rather than continually investing in fossil fuels and chemical industries, we must invest in clean, renewable energy.

To protect people and the climate, we need to overhaul our energy system. A movement is growing to support a large-scale effort to move the United States away from fossil fuels by building renewable energy and electrifying infrastructure. Technology for a largescale transition to renewables has existed for more than 20 years and is cheaply available now — we just need strong government policies backed by political will to see it through.

### Food & Water Watch recommends:

- An immediate national ban on fracking and its associated infrastructure, like pipelines, power plants and petrochemical facilities.
- Transitioning to 100 percent clean, renewable energy by 2030 through an investment in a New Deal-scale green energy public works program that fosters a rapid transition to real zero-emission clean energy like solar and wind, accompanied by widescale deployment of energy efficiency.

### **Endnotes**

- American Chemistry Council (ACC). Economics & Statistics Department. "Shale Gas and New Petrochemicals Investment: Benefits for the Economy, Jobs and US Manufacturing." March 2011 at 5; Fraizer, Reid R. "Houston cleaning up pollution by going after ethane cracker emissions." The Allegheny Front. October 27, 2013.
- 2 Soylu, Seref. Iowa State University. Retrospective Theses and Dissertations. "Autoignition of modeling of natural gas for engine modeling programs: An experimental and modeling study." 2001 at 1; U.S. Energy Information Administration (EIA). "What are natural gas liquids and how are they used?" (2012); Farag, H. and Anwar Elmessirie. "Maturity in the petrochemical industry features, motives and combating." TESCE. Vol. 30, No. 2. December 2004 at 722.
- 3 Carter, Kristin M. et al. Appalachian Oil & Natural Gas Research Consortium at West Virginia University. "A geologic study to determine the potential to create an Appalachian storage hub for natural gas liquids." August 1, 2016 to July 31, 2017 at 1.
- 4 Food & Water Watch (FWW). "The Fracking Endgame: Locked Into Plastics, Pollution and Climate Chaos." June 2019 at 8, 9 and 11.
- 5 *Ibid.* at 5; Holden, Emily. "Will a push for plastics turn Appalachia into next 'Cancer Alley'?" *Guardian* (UK). October 11, 2019.
- 6 Ebinger, Charles K. and Govinda Avasarala. The Brookings Institution. Natural Gas Task Force. "Natural Gas Liquids." Issue Brief 1. March 2013 at 7.
- 7 EIA. "Today in Energy: What are natural gas liquids and how are they used?" April 20, 2012. Available at https://www.eia.gov/todayinenergy/detail.php?id=5930#. Accessed September 20, 2019.
- 8 Unnasch, Stefan and Love Goyal. Life Cycle Associates LLC. Prepared for Western Propane Gas Associates. "Life Cycle Analysis of LPG Transportation Fuels Under the California LCFS." Life Cycle Associates Report LCA.8103.177.2017. October 24, 2017 at vi, 12 and 40.
- 9 Cocklin, Jamison. "Pennsylvania power plant said first to tap ethane for electricity." *Natural Gas Intelligence*. March 27, 2020.
- 10 U.S. Department of Energy (DOE). "Ethane Storage and Distribution Hub in the United States." November 2018 at 13; DOE. "Natural Gas Liquids Primer: With a Focus on the Appalachian Region." June 2018 at 30.

- 11 Kraus, Clifford and Eric Lipton. "After the boom in natural gas." New York Times. October 20, 2012; U.S. EIA. "Ethane production expected to increase as petrochemical consumption and exports expand." April 1, 2016.
- 12 American Chemistry Council (ACC). "Plastic Resins in the United States." July 2013 at 15; Kraus, Clifford. "Low oil prices pinch Exxon and Chevron earnings." *New York Times*. April 29, 2016; Kraus and Lipton (2012).
- 13 EIA (2016); EIA. "Growing U.S. HGL production spurs petrochemical industry investment." January 29, 2015.
- 14 Congressional Research Service (CRS). "Natural Gas Liquids: The Unknown Hydrocarbons." R45398. Updated October 26, 2018 at 11.
- 15 FWW analysis of EIA data: "U.S. Natural Gas Gross Withdrawals From Shale Gas (Million Cubic Feet)," "U.S. Natural Gas Gross Withdrawals (MMcf)," "U.S. Natural Gas Citygate Price (Dollars per Thousand Cubic Feet)," "Shale Gas Production." Available at www. eia.gov. Accessed April 2020.
- 16 FWW analysis of EIA data: "U.S. Field Production of Natural Gas Liquids (Thousand Barrels per Day)", "U.S. Natural Gas Liquid Composite Price (Dollars per Million Btu)." Available at www.eia.gov. Accessed April 2020.
- 17 Pooler, Michael. "Surge in plastics production defies environmental backlash." *Financial Times*. February 12, 2020; ACC. [Press release]. "ACC publishes 2019 comprehensive economic profile of \$553 billion business of American chemistry." August 21, 2019.
- 18 Tabuchi, Hiroko et al. "Big Oil is in trouble. Its plan: Flood Africa with plastic." *New York Times*. August 30, 2020.
- 19 Ebinger and Avasarala (2013) at 3; DOE (June 2018) at 8; Tabuchi et al. (2020).
- 20 Pooler (2020).
- 21 ExxonMobil. "2019 Outlook for Energy: A Perspective to 2040." 2019 at 13, 14, 17 and 23.
- 22 DOE (June 2018) at 22 and 23.
- 23 DOE (November 2018) at 25 and 30; Tullo, Alexander H. "Petrochemical makers look ahead to an uncertain decade." *Chemical & Engineering News*. March 16, 2020; Litvak, Anya and Laura Legere.

#### Natural Gas Liquids: Fracking's Hazardous Plastics and Pollution Scheme

"The wooing of a would-be petrochemical plant." *Pittsburgh Post-Gazette*. September 21, 2020; Cocklin, Jamison. "In bright spot, some jobs returning at Shell Pennsylvania cracker." *Natural Gas Intelligence*. April 22, 2020; Burger, Beth. "Permits for storage wells tied to Ohio River Valley petrochemical buildout canceled." *Columbus Dispatch*. October 2, 2020.

- 24 DOE. "The Appalachian Energy and Petrochemical Renaissance: An Examination of Economic Progress and Opportunities." June 2020 at iii and 1.
- 25 Brelsford, Robert. "ExxonMobil, SABIC let contract for USGC petrochemical project." *Oil & Gas Journal*. July 19, 2019.
- 26 IHS Markit. "The Shale Crescent USA Region: An Emerging Energy Cluster." March 2018 at 1; ACC Economics & Statistics Department. "The Potential Economic Benefits of an Appalachian Petrochemical Industry." May 2017 at 9.
- 27 Hays, Kristen. S&P Global Platts. "Logistics: Adapting to the Expected Surge in US Polyethylene Exports." March 2018 at 2; Ebinger and Avasarala (2013) at 8.
- 28 FWW analysis of EIA. Petroleum & Other Liquids. "Exports: Natural Gas Liquids." Available at https://www.eia.gov/dnav/pet/PET\_ MOVE\_EXP\_A\_EPL2\_EEX\_MBBLPD\_A.htm. Accessed July 2020.
- 29 Hays (2018) at 2 and 3; Sundria, Saket and Debjit Chakraborty. "Asia gas-to-plastic ventures bleed as US shale output sputters." Bloomberg. June 30, 2020.
- 30 Hays (2018) at 2; CRS (2018) at 13.
- 31 Tabuchi et al. (2020); Pooler (2020).
- 32 Ineos Olefins & Polymers Europe. [Press release]. "Ineos Intrepid leaves USA carrying first shale gas shipment to Europe." March 9, 2016; Davies, Rob. "First shipment of fracked shale gas set to arrive in UK." *Guardian* (UK). September 27, 2016; Farag and Elmessirie (2004) at 722; FWW. "The Trans-Atlantic Plastics Pipeline: How Pennsylvania's Fracking Boom Crosses the Atlantic." May 2017 at 1.
- 33 Baker, Andrew. "Enterprise, Navigator send out first ethylene cargo from Texas export terminal." Natural Gas Intelligence. January 8, 2020; Carr, Housley. RBN Energy LLC. "Friend (and NGL Storage) in Low-Lying Places, Part 3 — Easton Energy's Storage and Pipe Project." October 9, 2019; "New storage at Texas Brine Company LLC's Markham salt caverns for Easton Energy LLC." Storage Terminal Magazine. June 25, 2020.
- 34 Hays (2018) at 2; Stevens, Pippa. "Shale industry will be rocked by \$300 billion in losses and a wave of bankruptcies, Deloitte says." *CNBC*. June 22, 2020; Dickson, Duane et al. Deloitte Research Center for Energy & Industrials. "The Great Compression: Implications of COVID-19 for the US Shale Industry." 2020 at 6 and 9; Nodar, Janet. "US petrochemical market grapples with tariffs." JOC. January 30, 2019; McCoy, Michael. "Gulf Coast petrochemical plants open, and new ones are planned." *Chemical & Engineering News*. February 14, 2019; Pooler (2020); "Daelim Chemical USA withdraws from Belmont County cracker project; PTT says local site still 'top priority.'" *Intelligencer: Wheeling News-Register* (WV). July 14, 2020.
- 35 Sanzillo, Tom et al. Institute for Energy Economics and Financial Analysis (IEEFA). "Proposed PTTGC Petrochemical Complex in Ohio Faces Significant Risks." March 2020 at 2 to 3, 4 and 5 to 15; Shrum, Rick. "Letter to governors questions economic impact of cracker plants." Intelligencer: Wheeling News-Register (WV). June 16, 2020.
- 36 Goswami, M. et al. "Experimental and modelling study of the effect of elevated pressure on ethane and propane flames." *Fuel*. Vol. 166. February 2016 at 411; U.S. Department of Transportation (DOT). Pipeline and Hazardous Materials Safety Administration (PHMSA). "Emergency Response Guidebook." 2016 at 168 to 169.
- 37 DOE (November 2018) at 25 and 28; National Institutes of Health (NIH). "Ethane." PubChem. September 16, 2004 at Compound Summary and 3.2.1; NIH. "Butane." PubChem. September 16, 2004 at Compound Summary; NIH. "Propane." PubChem. March 26, 2005 at Compound Summary; NIH. "Propylene." PubChem. September

16, 2004 at Compound Summary; NIH. "Ethylene." PubChem. September 16, 2004 at Compound Summary.

- 38 DOT PHMSA (2016) at 168; Goswami, M. et al. (2016) at 411.
- 39 U.S. Government Accountability Office (GAO). "Gas Pipeline Safety: Stakeholders' and Officials' Views on Federal Odorizing Requirements." GAO-18-409. April 2018 at 5; Nova Chemicals. "Taking Care Along the Pipelines We Operate: A Guide for Landowners and Neighbours." October 2018 at 16.
- 40 Energy Transfer. "Mariner East Projects FAQs." At 1.
- 41 Pipelines and Informed Planning Alliance (PIPA). Prepared for DOT PHMSA. "Hazard Mitigation Planning: Practices for Land Use Planning and Development near Pipelines." 2015 at 31 and 32; DOT PHMSA (2016) at 168.
- 42 EPA. Office of Pollution Prevention and Toxic Substances. "Flammable Gases and Liquids and Their Hazards." EPA 744-R-94-002. February 1994 at 12 to 14 and 17.
- 43 Energy Transfer. "Are You Prepared to Respond to a Pipeline Emergency?" 2018 at PDF pages 6, 7 and 9; DOT. "Pipeline Safety Update." September 2012 at 35.
- 44 Cekirge, Huseyin Murat. "Determination of safety zones of gas (NG and NGL) pipelines." International Journal of Environmental Monitoring and Analysis. Vol. 3, No. 6-1. October 2015 at 13.
- 45 Seba, Erwin. "Blast rocks Enterprise natgas plant in Texas." *Reuters*. February 8, 2011; Morris, Mike. "Missing worker's remains found after plant explosion." *Houston Chronicle*. February 9, 2011.
- 46 Afzal, Zahid and Jim Magill. "ATEX rupture may reduce NGL production." *Platts Energy Trader.* January 28, 2015.
- 47 Seba, Erwin. "Missing worker believed dead in Phillips 66 pipeline blast." *Reuters*. February 11, 2017.
- 48 "Explosion, fire at Mont Belvieu facility." Star-Courier News (TX). August 6, 2020.
- 49 49 CFR §195.2 (2011).
- 50 CRS (2018) at 9 to 10.
- 51 49 CFR Appendix A to Part 195 (2011).
- 52 U.S. House of Representatives. Subcommittee on Railroads, Pipelines, and Hazardous Materials. "Re: Subcommittee Hearing on 'Pipeline Safety: Reviewing the Status of Mandates and Examining Additional Safety Needs.'" March 29, 2019 at 1 to 2 and 5; Pipeline Safety Trust. "Jurisdictional Issues Relating to Pipelines." Pipeline Briefing Paper #14. September 2015 at 3 and 5; 49 CFR Appendix A to Part 195 (2011).
- 53 49 CFR Appendix A to Part 195 (2011); Pipeline Safety Trust (2015) at 3.
- 54 Lee, Mike and Mike Soraghan. "Explosions from unregulated pipelines can kill in Texas while energy companies go unpunished." *E&E News*. March 7, 2019.
- 55 U.S. House of Representatives (2019) at 2 to 3; 80 Fed. Reg. 61610, 61612. October 13, 2015; Lee and Soraghan (2019).
- 56 Pipeline Safety Trust (2015) at 3 to 4; 49 USC §60104(e).
- 57 FWW analysis of DOT. PHMSA. Distribution, Transmission & Gathering, LNG, and Liquid Accident and Incident Data. "Hazardous Liquid Accident Data – January 2010 to present." Available at https:// www.phmsa.dot.gov/data-and-statistics/pipeline/distributiontransmission-gathering-Ing-and-liquid-accident-and-incident-data. Accessed April 2020.
- 58 Hageman, John. "North Dakota environmental regulators reviewing open spill cases after criticism over underreporting." *Forum News Service*. August 30, 2019.
- 59 MacPherson, James. "2015 North Dakota liquid gas spill much bigger than reported." Associated Press. August 20, 2019.
- 60 Moss, Rebecca. "Are we prepared?" Philadelphia Inquirer. October 15, 2020; Blanchard, Scott. "Mariner East 2 pipeline is up and running, Sunoco says." StateImpact Pennsylvania. December 29, 2018; FWW (2017) at 1 and 4.

#### Natural Gas Liquids: Fracking's Hazardous Plastics and Pollution Scheme

- 61 Hurdle, Jon. "Mariner East 2: Sunoco's incidents, fines and shutdowns fuel residents' safety concerns." StateImpact Pennsylvania. September 25, 2018; Phillips, Susan. "Natural gas pipeline blast in Beaver County prompts evacuation." StateImpact Pennsylvania. September 10, 2018; Caruso, Stephen. "Mariner East 2 owner fined \$30.6 million for western Pa. pipeline explosion." Pennsylvania Capital-Star. January 3, 2020.
- 62 Phillips (2018); Caruso (2020); Energy Transfer LP. U.S. Securities and Exchange Commission (SEC). Form 10-K. Filing year ending December 31, 2018 at 2.
- 63 Hurdle (2018).
- 64 Parrish, Will. "Pennsylvania governor under scrutiny for role in approving pipeline." *Guardian* (UK). April 8, 2019.
- 65 Levy, Marc. "AP exclusive: FBI eyes how Pennsylvania approved pipeline." Associated Press. November 12, 2019.
- 66 FWW analysis of National Institute on Money in Politics. Oil & Gas contributes to Governor Tom Wolf. Available at https:// www.followthemoney.org/show-me?dt=1&c-t-eid=5023799&dcci=33#%5B%7B1%7Cgro=y,d-id. Accessed June 2020; Parrish (2019); Cusick, Marie. "Wolf aide married to gas industry lobbyist may be violating Pa's ethics law." StateImpact Pennsylvania. December 10, 2016.
- 67 DOE (November 2018) at 13.
- 68 CRS (2018) at 10.
- 69 Stephan, Dominik. "10 billion dollar gas storage hub shall make Appalachia the new shale-hotspot in the US." *Process Worldwide*. September 9, 2016; "The \$10 billion petchem growth engine for Appalachia." *Rigzone*. September 6, 2016.
- 70 Carter et al. (August 1, 2016 July 31, 2017) at xiv to xv and 1; Cocklin, Jamison. "Unexpected regulatory delays hinder Ohio NGL storage project." Natural Gas Intelligence. January 12, 2018; Litvak, Anya. "Hunting for caverns: Appalachia's bid to rival the Gulf Coast." Pittsburgh Post-Gazette. June 11, 2017; Cart, Samantha. "Appalachian storage hub: Realizing our potential." West Virginia Executive. June 2, 2016.
- 71 Bérest, P. and B. Brouard. "Safety of salt caverns used for underground storage: Blow out; mechanical instability; seepage; cavern abandonment." Oil & Gas Science and Technology. Vol. 58, No. 3. 2003 at abstract.
- 72 Evans, D. J. British Geological Survey. Prepared for the Health and Safety Executive. "An Appraisal of Underground Storage Technologies and Incidents, for the Development of Risk Assessment Methodology." RR605. 2008 at 134 to 136 and 172 to 173; Wines, Michael. "Ground gives way, and a Louisiana town struggles to find its footing." New York Times. September 25, 2013; Louisiana Governor's Office of Homeland Security and Emergency Preparedness. "Frequently Asked Questions: Bayou Corne Sinkhole Incident." October 30, 2012.
- 73 Bérest, Pierre et al. "Review and analysis of historical leakages from storage salt caverns wells." Oil & Gas Science and Technology. Vol. 74, No. 27. 2019 at 3.
- 74 Ibid. at table 1 at 13 and 20; Evans (2008) at 161 and 165.
- 75 Evans (2008) at 160 and 161.
- 76 Bérest and Brouard (2003) at 367 to 368.
- 77 Honeywell UOP. "Contaminant Removal From Natural Gas Liquid Streams: UOP Adsorbant Solutions Help Remove Contaminants From Natural Gas Liquid Streams." February 2018 at 2; Gray, P. R. "NORM contamination in the petroleum industry." Journal of Petroleum Technology. Vol. 45, Iss. 1. January 1993 at 13 and 14.
- 78 Vickery, James H. and Robert Brunette. "Assessment of mercury exposure risk in eight gas processing plants in the GCC region." Proceedings of the Third International Gas Processing Symposium. Qatar. March 5-7, 2012 at 257, 261 and 264.
- 79 Gray (1993) at 13 and 14.

- 80 International Association of Oil & Gas Producers. "Managing Naturally Occurring Radioactive Material (NORM) in the Oil and Gas Industry." Report 412. March 2016 at 14; New York State Department of Environmental Conservation (NYSDEC). "Final Supplemental Generic Environmental Impact Statement on the Oil, Gas and Solution Mining Regulatory Program: Findings Statement." June 2015 at 15 and 19; Gray (1993) at 13 and 14; Perma-Fix Environmental Services, Inc. Prepared for Pennsylvania Department of Environmental Conservation. "Technology Enhanced Naturally Occurring Radioactive Materials (TENORM) Study Report." May 2016 at 6-1, 6-2 and 6-3.
- 81 NYSDEC (2015) at 15; DOE (November 2018) at 4.
- 82 Gray (1993) at 14; Perma-Fix Environmental Services, Inc. (2016) at 9-10.
- 83 Benchaita, Tayeb. Inter-American Development Bank. Environmental Safeguards Unit. "Greenhouse Gas Emissions From New Petrochemical Plants. Background Information Paper for the Elaboration of Technical Notes and Guidelines for IDB Projects." July 2013 at 3 to 5, 10 and 15; Frazier, Reid R. "Cracker' plant will bring jobs, but what about the air?" *The Allegheny Front*. March 24, 2012; Chen, Mei-Hsia. "A feasible approach to quantify fugitive VOCs from petrochemical processes by integrating open-path fourier transform infrared spectrometry measurements and industrial source complex (ISC) dispersion model." *Aerosol and Air Quality Research*. 2015 at 1110; Rivas-Arancibia, Selva et al. "Oxidative stress caused by ozone exposure induces loss of brain repair in the hippocampus of adult rats." *Toxicological Sciences*. Vol. 113, No. 1. 2010 at 187.
- 84 Lithner, Delilah et al. "Environmental and health hazard ranking and assessment of plastic polymers based on chemical composition." *Science of the Total Environment*. Vol. 409. 2011 at 3322; Jambeck, Jenna R. et al. "Plastic waste inputs from land into the ocean." *Science*. Vol. 347, Iss. 6223. February 2015 at 768 and 770.
- 85 Pezzullo, Phaedra C. "Touring 'Cancer Alley,' Louisiana: Performances of community and memory for environmental justice." Text and Performance Quarterly. Vol. 23, No. 3. July 2003 at 227; DeLaune, Jonathan Zachary. Louisiana State University, Agricultural and Mechanical College, Master's Thesis. "Unwelcome neighbors? Industrial growth and water pollution in Lake Charles, Louisiana, 1940-1960." 2007 at 6; Linder, Stephen H. et al. "Cumulative cancer risk from air pollution in Houston: Disparities in risk burden and social disadvantage." Environmental Science & Technology. Vol. 42, No. 12. 2008 at 4312 and 4314.
- 86 FWW analysis of EPA. Superfund, Resource Conservation and Reclamation Act sites and brownfield sites for the Upper Ohio River Valley watershed. Available at www.epa.gov/cleanups/cleanupsmy-community#map. Accessed July 2018.
- 87 Baurick, Tristan, Lylla Younes and Joan Meiners. "Welcome to 'Cancer Alley,' where toxic air is about to get worse." *Times-Picayune and Advocate* and *ProPublica*. October 30, 2019; Fleischman, Lesley and Marcus Franklin. National Association for the Advancement of Colored People and Clean Air Task Force. "Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil & Gas Facilities on African American Communities." November 2017 at 7, 23 and 26 to 27.
- 88 DOE (November 2018) at 14 and 15.
- 89 FWW. "Another Petrochemical Sacrifice Zone: Proposed Appalachian Gas 'Cluster' Would Pollute Region and Entrench Fossil Fuel and Plastics Infrastructure for Decades." September 2018 at 2.
- 90 FWW analysis of EPA. Toxics Release Inventory (TRI) Story Map data. The counties selected for analysis were based on a U.S. Geological Survey description of the Ohio River Valley. Only counties within this region that had TRI facilities were included in the analysis. Population within one mile of TRI facilities in Belmont, Columbiana, Jefferson and Washington counties, Ohio; Allegheny, Beaver and Washington counties, Pennsylvania; and Brooke, Hancock, Jackson, Marshall, Mason, Ohio, Pleasants, Tyler, Wetzel and Wood counties, West Virginia. Available at https://epa.maps.arcgis.com/apps/Map-

#### foodandwaterwatch.org

Series/index.html?appid=c483ab2127e44453b1f8d025af30ce31. Accessed January 2018.

- 91 DOE (November 2018) at 39 to 40.
- 92 Balch, Bridget. "Mont Belvieu area under 'precautionary evacuation' because of leak." Houston Chronicle. June 26, 2016; Peter Applebome. "Chemicals in salt caverns hold pain for Texas town." New York Times. November 28, 1988; Seba, Erwin. "Blast rocks Enterprise natgas plant in Texas." Reuters. February 8, 2011; Morris (2011).
- 93 Souri, Amir Hossein et al. "A 15-year climatology of wind pattern impacts on surface ozone in Houston, Texas." Atmospheric Research. Vol. 174. 2016 at 9 to 10.
- 94 CRS (2018) at 14 to 15; Helmig, Detlev et al. "Reversal of global atmospheric ethane and propane trends largely due to US oil and natural gas production." *Nature Geoscience*. Vol. 9. July 2016 at 490 and 492 to 494.
- 95 Colborn, Theo et al. "Natural gas operations from a public health perspective." International Journal of Human and Ecological Risk Assessment. September 2011 at 1042; Wong, Chit Ming et al. "Cancer mortality risks from long-term exposure to ambient fine particle." Cancer Epidemiology, Biomarkers & Prevention. May 2016 at 839.
- 96 Salam, Muhammad T. et al. "Birth outcomes and prenatal exposure to ozone, carbon monoxide, and particulate matter: Results from the Children's Health Study." *Environmental Health Perspectives*. Vol. 113, No. 11. November 2005 at 1638 and 1643; Bravender, Robin. "Study links smog exposure to premature death." *New York Times*. March 12, 2009.
- 97 Calderón-Garcidueñas, Lilian et al. "Exposure to severe urban air pollution influences cognitive outcomes, brain volume and systemic inflammation in clinically healthy children." Brain and Cognition. Vol. 77, Iss. 3. 2011 at 345 and 353; Mokoena, Mmalebuso Lynnette et al. "Ozone inhalation induces central oxidative stress, cognitive deficits, depressogenic-and anxiogenic-like behavior in stress sensitive rats." FASEB Journal. Vol. 27, No. 1. April 2013 at Abstract; Rivas-Arancibia, Selva et al. "Oxidative stress caused by ozone exposure induces loss of brain repair in the hippocampus of adult rats." Toxicological Sciences. Vol. 113, No. 1. 2010 at 187, 195 and 196; Wong et al. (2016) at 839.

- Yang, Chun-Yuh et al. "Respiratory and irritant health effects of 98 population living in a petrochemical-polluted area in Taiwan." Environmental Research. Vol. 74, No. ER973762. 1997 at 145, 147 and 148; Belli, S. et al. "Case-control study on cancer risk associated to residence in the neighborhood of a petrochemical plant." European Journal of Epidemiology. Vol. 19. 2004 at 49, 50 and 53; Wichmann, Fernando A. et al. "Increased asthma and respiratory symptoms in children exposed to petrochemical pollution." Journal of Allergy and Clinical Immunology. Vol. 123, No. 3. 2009 at 632; White, Neil et al. "Meteorologically estimated exposure but not distance predicts asthma symptoms in schoolchildren in the environs of a petrochemical refinery: a cross-sectional study." Environmental Health. Vol. 8, No. 45. September 25, 2009 at 1; Sopian, Nor Ashikin. "Risk of respiratory health impairment among susceptible population living near petrochemical industry - a review article." Iranian Journal of Public Health. Vol. 45, No. 1. February 2016 at 9, 10, 11 and 15; Kongtip, Pornpimol et al. "Health effects of people living close to a petrochemical industrial estate in Thailand." Journal of the Medical Association of Thailand. Vol. 96, No. 5. 2013 at S67 and S70.
- 99 Fleischman and Franklin (2017) at 8.
- 100 Girgin, S. and E. Krausmann. "Historical analysis of U.S. onshore hazardous liquid pipeline accidents triggered by natural hazards." *Journal of Loss Prevention in the Process Industries*. Vol. 40. 2016 at table 2 on 584 and 588; DOE (November 2018) at 78; Jaffe, Amy Myers et al. Council on Foreign Relations. "Impact of Climate Risk on the Energy System." September 2019 at 20 and 61.
- 101 Girgin and Krausmann (2016) at table 2 on 589; DOE (November 2018) at 78.
- 102 Griggs, Troy et al. "More than 40 sites released hazardous pollutants because of Hurricane Harvey." *New York Times*. September 8, 2017.
- 103 U.S. Department of Homeland Security. Federal Emergency Management Agency. "Phillips Petroleum Chemical Plant Explosion and Fire." USFA-TR-035. October 1989 at 1 and 2; Holcombe, Madeline. "Now-extinguished Deer Park blaze joins the list of explosions and fires that have rocked the Houston area." CNN. March 20, 2019.
- 104 Seba, Erwin. "Residents flee fourth major Texas petrochemical fire this year." *Reuters*. November 27, 2019.

**Food & Water Watch** mobilizes regular people to build political power to move bold and uncompromised solutions to the most pressing food, water and climate problems of our time. We work to protect people's health, communities and democracy from the growing destructive power of the most powerful economic interests.



(202) 683-2500 foodandwaterwatch.org • info@fwwatch.org Copyright © June 2021 Food & Water Watch