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Submitted via email to Lawrence Slavitter [lawrence.m.slavitter@usace.army.mil](mailto:lawrence.m.slavitter@usace.army.mil)

**Re: CENAP-OP-R-2016-0181-39 -- Gibbstown Logistics Center port expansion.**

To Whom It May Concern,

The Delaware Riverkeeper Network requests that you formally re-open the comment period on CENAP-OP-R-2016-0181-39 for expansion of the Gibbstown Logistics Center port. Critical information has come to light about the intended use of this expansion to support Liquefied Natural Gas (LNG) exports. These important facts were not properly disclosed to the public with sufficient clarity or detail to support informed public comment, nor were they meaningfully considered by the US Army Corps of Engineers in the public notice or project materials in a way that could/would support informed and meaningful public comment or Army Corps decision-making. As a result, the public has been denied a full and fair opportunity to comment on this proposal. In addition, there has been a failure to fulfill your obligations for review pursuant to the National Environmental Policy Act, critical for Army Corps decision-making and informed public comment. Therefore, we request that full disclosure of the LNG aspects of the proposal be released to the public, including the environmental, port, and public safety consequences, and thereafter a 90-day public comment period be provided.

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## **The Army Corps Will Violate Federal Law If It Approves the Gibbstown Logistics Center Proposal.**

The US Army Corps of Engineers (Army Corps) has not fulfilled its legal obligations pursuant to the National Environmental Policy Act (NEPA). The Army Corps has not undertaken the necessary reviews or made the public disclosures required by NEPA. Issuing an Army Corps approval for the Gibbstown Logistics Center (CENAP-OP-R-2016-0181-39), which now undeniably includes an LNG export operation, would be a violation of federal law that will be subject to legal challenge.

NEPA is our “basic national charter for protection of the environment.”<sup>1</sup> NEPA makes environmental protection a part of the mandate of every federal agency<sup>2</sup> by requiring that federal agencies take environmental considerations into account in their decision-making “to the fullest extent possible.”<sup>3</sup> Pursuant to NEPA federal agencies must consider environmental harms and the means of preventing them in a “detailed statement” before approving any “major federal action significantly affecting the quality of the human environment.”<sup>4</sup> This required analysis serves to ensure that “the agency will not act on incomplete information, only to regret its decision after it is too late to correct.”<sup>5</sup> Approval of the LNG export facility proposed definitely meets the standard of requiring NEPA review.

### **A. Army Corps Has Failed to Provide Proper Public Disclosure.**

In addition to fulfilling its overall legal obligation to provide a full and fair opportunity for public comment, including providing full information on the actual project being proposed, there is an obligation on the Army Corps for full disclosure and an engaged public process pursuant to NEPA.

NEPA “guarantees that the relevant information [concerning environmental impacts] will be made available to the larger audience,” including the public, “that may also play a role in the decision-making process and the implementation of the decision.”<sup>6</sup> As NEPA’s implementing regulations explicitly provide, “public scrutiny [is] essential to implementing NEPA.”<sup>7</sup> The opportunity for public participation guaranteed by NEPA ensures that agencies will not take final action until after their analysis of the environmental impacts of their proposed actions has been subject to public scrutiny.<sup>8</sup>

NEPA is an “environmental full disclosure law.”<sup>9</sup> It requires that an agency obtain and consider detailed information concerning environmental impacts, and it “ensures that an agency will not act on incomplete information, at least in part, by ensuring that the public will be able to analyze and comment on an action’s environmental implications.”<sup>10</sup> The information provided to the public “must

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<sup>1</sup> 40 C.F.R. § 1500.1(a).

<sup>2</sup> See 42 U.S.C. § 4332(1).

<sup>3</sup> 42 U.S.C. § 4332.

<sup>4</sup> Id. § 4332(2)(C).

<sup>5</sup> *Marsh v. Oregon Natural Res. Council*, 490 U.S. 360, 371 (1979).

<sup>6</sup> *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989).

<sup>7</sup> 40 C.F.R. § 1500.1(b).

<sup>8</sup> See *N. Plains Res. Council v. Surface Transp. Bd.*, 668 F.3d 1067, 1085 (9th Cir. 2011) (noting that where “data is not available during the EIS process and is not available to the public for comment,” the process “cannot serve its larger informational role, and the public is deprived of their opportunity to play a role in the decision-making process”) (quoting *Robertson*, 490 U.S. at 349).

<sup>9</sup> *Monroe Cnty. Conservation Council, Inc. v. Volpe*, 472 F.2d 693, 697 (2d Cir. 1972).

<sup>10</sup> *Ohio Valley Env'tl. Coal. v. U.S. Army Corps of Eng'rs*, 674 F. Supp. 2d 783, 792 (S.D. W. Va. 2009) (internal quotation marks and citations omitted).

be of high quality” because “[a]ccurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.”<sup>11</sup>

The Army Corps did not fully or fairly disclose the intended use of the proposed Gibbstown Logistics Center expansion to support LNG exports, including bringing LNG to the site via truck and/or rail. These important facts were not properly disclosed to the public with sufficient clarity or detail to support informed public comment, nor were they meaningfully considered by the Army Corps in the public notice or project materials in a way that could/would support informed and meaningful public comment or agency decisionmaking. As a result, the public has been denied a full and fair opportunity to comment on this proposal as anticipated by NEPA.

The fact that the Army Corps, on page 3 of the public notice for comment, mentions that the “site will be designed to handle a multitude of products” amongst them being LNG does not provide full and fair public notification when you look at the notice as a whole and when you look across the board at the discussion by the agencies and file materials Delaware Riverkeeper Network secured through legal information requests. The Army Corps may have made a passing reference to LNG in its April 4, 2019 public notice and call for comment but that passing mention cannot be said to rise to the level of being clear about what is being proposed for the site – the notice merely states that the “site will be designed to handle a multitude of products” and lists several items with LNG being part of the list. This reference does not make clear to the public that LNG exports is an intended and primary focus of the new expansion, nor does it give any detail about the volumes of LNG being proposed, the thousands of truck trips that will be required to bring the gas to the site, the level of rail traffic that will be required, the source of the gas and the implications of its extraction, to what degree there will be onsite storage and increased shipping traffic, etc. In addition, given that dearth of information about the LNG export goal, plan and/or impacts in the documents we secured via FOIA, as well as the lack of NEPA documentation and analysis, the public notice cannot be said to rise to the level of full and fair public notice of the proposal; rather, it is a clear and obvious obfuscation.

**B. The Army Corps Did Not Assess nor Disclose to Any Meaningful Degree, the Environmental, Safety, Community, Economic or Port Impacts.**

A proper NEPA assessment must fully assess and disclose the complete range of environmental consequences of the proposed action, including “ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, [and] cultural” impacts, “whether direct, indirect, or cumulative.”<sup>12</sup> Direct effects are “caused by the action and occur at the same time and place.”<sup>13</sup> Indirect effects are those impacts that are caused by the action, but occur “later in time or farther removed in distance, but are still reasonably foreseeable,” and may include “growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”<sup>14</sup> Cumulative impacts are “impact[s] on the environment which result[] from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes

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<sup>11</sup> 40 C.F.R. § 1500.1(b).

<sup>12</sup> 40 C.F.R. §§ 1502.16(a), (b); 1508.8.

<sup>13</sup> 40 C.F.R. § 1508.8(a).

<sup>14</sup> 40 C.F.R. § 1508.8.

such other actions.”<sup>15</sup> NEPA also prohibits segmentation in order to avoid full and fair review of the implications and impacts of a project or action.

LNG has significant ramifications environmentally, for public safety, and for shipping on the Delaware River system. There is no discussion or analysis of any of these issues, including but not limited to: the safety, pollution and health implications of trucking (anticipated to at least triple; the anticipated truck traffic created by the LNG facility for the local community has the likely potential of being quite massive given that the LNG will be transferred to the ships via a truck rack that is being designed to handle 200 to 220 trucks per day) and railing in the significant volumes of LNG anticipated for the site (1.5 million metric tonnes per year); the ramifications of storing LNG on a ship while it is slowly loaded over a period of at least 15 days; what LNG exports from Gibbstown means for shipping, ship traffic and the business operations of other shippers operating through Delaware River ports; the climate change and other environmental impacts of exporting LNG from this site including the onsite impacts, but also the ramifications from the gas extraction activities that will be induced/supported by this operation and the downstream impacts from the use of the gas; the safety ramifications of having an LNG operation of this kind on the Delaware River including for the surrounding community; the implications for other shippers and port operations (there is anticipated to be 2 LNG export operations a month – 24 a year – from this site); the impacts on the endangered Atlantic and Shortnose Sturgeon or the designated Atlantic Sturgeon Critical Habitat in the River; the water quality ramifications due to the release of ballast water from LNG ships; the air and other ramifications of flaring off of gas and/or the construction and operation of a small capacity liquefier on site; just to name a few.

It is notable that in a November 16, 2017 letter to the US Coast Guard, Delaware River Partners notes the limitations caused by having just a single-berth at this site while also accommodating an LNG operation there – i.e. that “LNG, LHG, or other hazardous or non-hazardous cargo operations will not run concurrently, as the single-berth wharf only permits one vessel to dock at a given time for a single commodity.” Clearly, the applicant and the agencies knew that LNG was an intended goal of this project whether it was a single-berth or two-berth design and so there is no excuse not to have considered the impacts that constructing and operating an LNG export facility at this site (including the delivery of LNG by rail and truck) during review of stage 1 as well as the current stage 2 of this project and there is no excuse for not having notified the public of this intended use in the Army Corps’ April 4, 2019 public notice.

In addition to the failure to consider the environmental, safety, economic, and port ramifications of the proposed LNG operation at the site, there has also been a failure to consider the proposed Liquefied Hazardous Gas (LHG) Handling facility proposed for the site. According to the November 2017 letter to the Coast Guard the LHG operation is anticipated to include 24 vessels a year (2 a month) at the site creating additional potential pressures for Delaware River port traffic, particularly when considered along with the anticipated 24 vessels a year of LNG. In addition, there will be constructed ~100,000 BBL of onsite storage, with the vessels also being used for storage in order to increase the onsite storage capacity. LHG will be brought to the site via rail car, the environmental and safety ramifications of which have also not been analyzed. The project includes ~3 acres of tanks and associated equipment as additional project elements. This information also required full analysis

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<sup>15</sup> 40 C.F.R. § 1508.7 (emphasis added).

by the Army Corps, particularly the ramifications of having both the proposed LNG and LHG at the same location.

### **C. The Current Proposal is a Clear Case of Illegal Segmentation.**

NEPA prohibits segmentation of projects for purposes of NEPA review. As stated by the DC Circuit in *Delaware Riverkeeper Network, et al. v. Federal Energy Regulatory Commission*, 753 F.3d 1304, 1307 (D.C. Cir. 2014):

“An agency impermissibly “segments” NEPA review when it divides connected, cumulative, or similar federal actions into separate projects and thereby fails to address the true scope and impact of the activities that should be under consideration. .... The justification for the rule against segmentation is obvious: it “prevent[s] agencies from dividing one project into multiple individual actions each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” *NRDC v. Hodel*, 865 F.2d 288, 297 (D.C. Cir. 1988)” The rule against segmentation requires the federal agency, in this case, to consider all connected and cumulative actions.”

It has now become clear to the Delaware Riverkeeper Network that the prohibition against segmentation has in fact been violated. Not only was the expansion of the facility reasonably foreseeable, but it now appears that this expansion was planned all along and that expansion was documented by the company.

- In a July 24, 2016 Philadelphia Inquirer news article, the company admits that it had envisioned LNG for this site: “Although a company prospectus last year envisioned a liquefied natural gas (LNG) facility at Repauno - disconcerting some residents and environmental groups such as the Sierra Club and the Delaware Riverkeeper – ‘that is no longer in our designs,’ Lewis said.” As a result, having an LNG operation at this site was clearly considered and therefore it was reasonably foreseeable that LNG would become a serious component of this operation at some point. It now seems obvious that while Delaware River Partners removed the LNG prospect from its application materials in 2016, it had every intention to restore that component of the project at a future date, and simply removed it to lighten the level of agency and public scrutiny and review that would be given to the project during the reviews that were taking place for stage 1 of the Gibbstown Logistics Center.
- A November 16, 2017 Letter of Intent was submitted to the US Coast Guard specifically describing the project as being an LNG facility. This letter was sent to the US Coast Guard before the Army Corps issued its approval for stage 1 of this project on December 21, 2017. And so, it is clear that Delaware River Partners knew, and the Army Corps should have known, that the ultimate goal of the project was to build an LNG facility at this site. The letter to the Coast Guard has significant detail, including the anticipated export capacity of the site (1.5 million metric tonnes). The failure to consider the full project, including the LNG component, is a clear case of segmentation in violation of federal law. It is clear, should have been clear to the Army Corps, and would have been clear to the Army Corps had it done its NEPA due diligence, that the two stages of the project were and are interdependent and are clearly two parts of the same whole. There is a clear violation of the prohibition against segmentation that has taken place/is taking place at this site.

- There is clearly a foreseeable expansion of the facility to accommodate additional LNG capacity in the future (i.e. a state 3 of the project) given that the November letter to the Coast Guard describes the current project as “proposing an LNG facility with an initial capacity of up to approximately 1.5 million MTPA of LNG (roughly 1,670,000 BBL per month).” The descriptive language of “initial capacity” makes clear that more LNG exports are to come, that there will be additional expansions, and that such expansions need consideration as part of this current project in order to avoid additional segmentation violations.

Further, NEPA requires consideration of all reasonably foreseeable impacts resulting from a proposed action, activity or project. The facts above make clear that the LNG component has always been reasonably foreseeable.

#### **D. A Full Environmental Impact Statement Is Clearly Mandated.**

Authorizing the Gibbstown Logistics Center to export LNG and to construct and operate LNG export facilities demands an Environmental Impact Statement (EIS) pursuant to NEPA because this project will clearly have significant effects on the human environment. Unquestionably, construction and operation of the export facilities, including the transportation of the liquified natural gas (LNG) to the site via truck and rail will have significant effects that trigger the mandate for a full NEPA EIS. In addition, there will be upstream and downstream impacts with respect to the extraction and use of the source fracked gas that are related and reasonably foreseeable actions which must be considered. Export of LNG will induce additional shale gas extraction/production in upstream regions, result in increased downstream uses, increased domestic gas prices, and increased greenhouse gas emissions and global warming. Each of these effects has direct importance to the Army Corps’ consideration of the Gibbstown Logistics port expansion proposal which includes LNG export as a significant, if not primary, goal of the project.

LNG operations pose specific and adverse risks to surrounding neighborhoods as well as the local, regional and national environment. The inclusion of LNG operations is a significant aspect of the Gibbstown Logistics Center expansion that must receive full NEPA EIS review. Further, the Applicant has already segmented its operations at Gibbstown into different projects, even though they all support each other. Continuing to permit such segmentation masks the environmental and health harms of Delaware River Partners’ operations as a whole. The proposal to truck/rail in the LNG along with long offloading times resulting in at least 15 days of storage on vessels raises additional impacts that need to be assessed and addressed, in addition to the environmental (including climate change) and health consequences at the point of gas extraction and as the result of downstream use. There are also implications for port traffic along the Delaware River in need of meaningful consideration and review.

The Delaware Riverkeeper Network (DRN) has been reviewing documents from multiple agencies regarding this Gibbstown Logistics Center expansion. Delaware Riverkeeper Network has conducted file reviews, secured and reviewed documents via the Freedom of Information Act and state right to know laws. At no point did the Delaware Riverkeeper Network see documents in the file that even resembled the necessary review pursuant to NEPA – neither an Environmental Assessment nor an Environmental Impact Statement—of the LNG export proposal being advanced here. And certainly, there has been no NEPA public comment process that would allow the public to assess and/or comment upon such an analysis.

As noted throughout this letter, there are a wealth of environmental and public impacts that need to be fully assessed pursuant to NEPA. Issues that need to be considered in a NEPA EIS include, but are not limited to:

- The safety, pollution and health implications of truck and rail traffic necessary to support the LNG (and LHG) operations proposed for the site. It is anticipated that truck traffic will at least triple over current levels as a result of the LNG export portion of the proposal. Truck racks that will be used to transfer the LNG from truck to ship will be designed to accommodate 200 to 220 trucks per day; a clear indication of the massive volume of truck traffic that will be created by the proposed LNG operations at the site. This will result in tremendous air pollution, noise pollution, property value, quality of life, traffic impact and traffic safety concerns that must be assessed. LNG volumes anticipated for the site are 1.5 million metric tonnes per year. It is anticipated that offloading from truck to rail will take 15 days. There will clearly be a massive uptick in the volume of truck traffic that this LNG facility will induce.
- The ramifications, particularly safety ramifications, of storing LNG on a ship while it is slowly loaded over a period of at least 15 day.
- The ramifications of the proposed LNG exports for shipping, ship traffic and the business operations of other shippers operating through Delaware River ports as well as for endangered populations such as the Delaware River Atlantic Sturgeon that are being severely impacted by ship strikes along the Delaware. Given that there are less than 300 spawning adults left of the Delaware River's genetically unique population of Atlantic Sturgeon, the ramifications of increased ship traffic and ship strikes is serious and potentially catastrophic.
- The onsite environmental impacts of exporting LNG from this site.
- The upstream climate and environmental ramifications of the gas extraction activities that will be induced/supported by this operation. Increased shale gas extraction, including drilling and fracking, is a related, connected and foreseeable outcome of the proposed Gibbstown LNG facility given that the facility is intended to secure and support increased shale gas development in order to supply the facility with shale gas for export. As such, NEPA requires consideration of the environmental and community impacts of shale gas development that will result in order to supply the Gibbstown LNG facility. Shale gas development is an extraordinarily land and water-intensive process that converts agricultural, forest, and range lands to industrial uses, consumes millions of gallons of water per well, and generates huge quantities of hazardous wastes, and results in tremendous and harmful volumes of climate changing emissions as well as the release of other hazardous air pollutants.<sup>16</sup>

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<sup>16</sup> Shale gas extraction is also a significant source of hazardous air pollution, including methane, volatile organic chemicals (VOCs), and air toxics such as benzene and ethylbenzene. In July 2011, EPA proposed a suite of draft regulations under the Clean Air Act to set new source performance standards for VOCs and sulfur dioxide, an air toxics standard for oil and natural gas production, and an air toxics standard for natural gas transmission and storage. Final regulations are due by April 3, 2012. See <http://www.epa.gov/airquality/oilandgas/> The Department of Energy's advisory panel on shale gas has urged EPA to extend these rules to existing shale gas production sources and to adopt regulations addressing methane explicitly. Bridget DiCosmo, "DOE Panel Urges EPA to Strengthen Proposed Air Rules for 'Fracking,'" Nov. 10, 2010, <http://insideepa.com/201111102381935/EPA-Daily-News/Daily-News/doe-panel-urges-epa-to-strengthen-proposed-air-rules-for-fracking/menu-id-95.html> Methane is twenty times more potent a greenhouse gas than carbon dioxide. See <http://www.climate-science.gov/infosheets/highlight1/default.htm>

The oil and gas industry is the single largest source of methane emissions in the US, accounting for nearly 40% of national methane emissions. See <http://epa.gov/airquality/oilandgas/pdfs/20110728factsheet.pdf>

- The downstream environmental and climate impacts from the use of the gas to be exported.
- The safety ramifications of having an LNG operation of this kind on the Delaware River including for the surrounding community.
- The implications for other shippers and port operations that will result from the LNG export use of the site at a rate of 2 LNG export vessels a month / 24 a year.
- The impacts on the endangered Atlantic and Shortnose Sturgeon and the designated Atlantic Sturgeon Critical Habitat that will be impacted. The Delaware River population of Atlantic Sturgeon is genetically unique with a surviving population that includes less than 300 spawning adults.<sup>17</sup> With numbers this precariously low, the responsibility for vigilant protection by our federal agencies could not be greater. The Delaware River population of Atlantic Sturgeon, along with the entire NY Bight Distinct Population Segment (DPS), of which the Delaware River population is a part, are designated as endangered pursuant to the Endangered Species Act. In addition, the Delaware River’s population of Shortnose Sturgeon is also listed as federally endangered and suffers low population figures.
- The water quality ramifications due to the release of ballast water from LNG ships. The “... discharge of ballast water and sediment from ships during LNG terminal loading operations may result in the introduction of invasive aquatic species.”<sup>18</sup>
- The water quality ramifications due to dredging and the potential resuspension/reintroduction from CDF discharges of contaminants to the Delaware River, including PCBs. CDFs holding dredged sediments from Delaware River dredging projects have been a demonstrated source of toxic contamination to the River, inflicting serious water quality impacts.
- The air and other ramifications of flaring off of gas and/or the construction and operation of a small capacity liquefier on site as discussed in a letter sent on November 16, 2017 to the US Coast Guard.
- Releases, spills or leaks during storage, transfer and/or transport of LNG.<sup>19</sup>
- Risk of accidents, incidents, fire or explosion during transport storage and/or transfer of LNG.<sup>20</sup> While it is asserted there will be no onsite storage of LNG, the process of loading each ship will take on the order of 15 days—this translates into 15 days of storage on the vessel while loading operations are taking place. The potential safety implications need to be examined and disclosed. “Natural gas is combustible, so an uncontrolled release of LNG poses a serious hazard of explosion or fire.”<sup>21</sup> The greatest LNG hazards include pool fires, flammable vapor clouds and flameless explosion.<sup>22</sup>
  - A pool fire occurs if LNG spills near an ignition source and in fact ignites, “the evaporating gas in a combustible gas-air concentration” burns above the LNG pool, and then proceeds

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<sup>17</sup> ASSRT (Atlantic Sturgeon Status Review Team) 2007. Status Review of Atlantic Sturgeon (*Acipenser oxyrinchus oxyrinchus*). Report to National Marine Fisheries Service, Northeast Regional Office. February 23, 2007. 174 pp.

<sup>18</sup> IFC, Environmental, Health, and Safety Guidelines for Liquefied Natural Gas (LNG) Facilities, April 30, 2007.

<sup>19</sup> IFC, Environmental, Health, and Safety Guidelines for Liquefied Natural Gas (LNG) Facilities, April 30, 2007.

<sup>20</sup> IFC, Environmental, Health, and Safety Guidelines for Liquefied Natural Gas (LNG) Facilities, April 30, 2007.

<sup>21</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>22</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

to spread as the LNG pool expands away from its source and continues evaporating.<sup>23</sup> Pool fires are intense and will burn more hotly and rapidly than oil or gasoline.<sup>24</sup> Pool fires cannot be extinguished – “all the LNG must be consumed before they go out.”<sup>25</sup>

- Flammable vapor clouds happen if there is an LNG spill that does not immediately ignite and instead evaporates forming a vapor cloud.<sup>26</sup> Vapor clouds can drift a distance from the site of the spill.<sup>27</sup> If the vapor cloud encounters an ignition source then “those portions of the cloud with a combustible gas-air concentration will burn.”<sup>28</sup> While a vapor cloud is not toxic, it can displace breathable air and as a result cause asphyxiation.<sup>29</sup> Extremely cold LNG can injure through direct contact.<sup>30</sup> It has been said that “environmental damage associated with an LNG spill would be confined to fire and freezing impacts near the spill since LNG dissipates completely and leaves no residue.”<sup>31</sup>
- “LNG spilled directly onto a warm surface (such as water) could result in a sudden phase change known as a Rapid Phase Transition (RPT).”<sup>32</sup> “If LNG spills on water, it could theoretically heat up and regasify almost instantly in a ‘flameless explosion’.”<sup>33</sup>

- Given the site’s history of industrial operations, the known contamination that has and still does exist on the site, and its superfund status, there is a need to consider the potential synergy of harm that could occur if there was a catastrophic release at the site. Known contaminants of concern at the site include: nitrobenzene, aniline and mixed acids, sodium nitrite and nitrosylsulfuric acid.
- The entire site is in the flood hazard area. What are the implications of a flood for the LNG operations and LHG operations if there were a flood during transfer operations or storage onsite? With climate changing increasing the frequency, duration and magnitude of floods, this is an obvious and serious consideration. The ramifications of catastrophic flooding due to climate change is compounded by the known flood and safety ramifications of storm surge in the Delaware Estuary.
- The Gibbstown Logistics Center is located next to a residential area. There is a day care center and housing in Gibbstown adjacent to the Block and Lot of this site. These residential and day

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<sup>23</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>24</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>25</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>26</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>27</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>28</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>29</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>30</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>31</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>32</sup> IFC, Environmental, Health, and Safety Guidelines for Liquefied Natural Gas (LNG) Facilities, April 30, 2007.

<sup>33</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

care uses are not compatible with an LNG export operation. The safety issues of the trucking, rail transport, storage, and transfer of LNG is dangerous if there is an accident or incident, and is in need of careful consideration.

- The economic ramifications of the proposed LNG export. By causing an increase in shale gas prices here in the U.S., there is widespread concern that the export of shale gas to foreign countries will adversely impact a number of other industries and the economic benefits and jobs they provide.<sup>34</sup>
- LNG infrastructure can be vulnerable to terrorist attack.<sup>35</sup> This threat needs serious consideration. While, according to a report prepared for Congress in 2003, it was reported that “No LNG tanker or land-based LNG facility has been attacked by terrorists ... similar natural gas and oil facilities have been favored terror targets internationally.”<sup>36</sup> Among the catastrophic events that can result from an accident or attack at an LNG facility are pool or vapor cloud fires.<sup>37</sup>
- EPA identified the Repauno site in 2003 as one of the largest PCB point sources in the Delaware Estuary (among the top 10). Additional dredging, site disturbance and stormwater systems will disturb PCBs, which have been found in near-shore sediments and in runoff from the site. There is a zone of highly contaminated sediments immediately adjacent to the shore and port facility. The remobilization (and dewatering of dredged sediments) will create re-release of PCBs into the estuary, including in Atlantic Sturgeon spawning habitats. The ramifications for the reintroduction of PCBs into the environment needs careful assessment. Given that there is a reasonably foreseeable future expansion at this site to accommodate increased LNG operations, there needs to be consideration of this expansion for issues such as PCBs and other environmental effects.
- The job impacts of the proposal are in need of consideration and public disclosure. LNG exports, while creating some jobs in the gas industry, many temporary, creates a net job loss effect for the country. In fact, LNG exports could result in the net loss of as many as 270,000 jobs per year in our country.<sup>38</sup> The job implications must be assessed

The Army Corps is in clear violation of NEPA if it grants any approvals for the Gibbstown Logistics Center CENAP-OP-R-2016-0181-39 at this time. In addition, the Army Corps is in violation of its legal and moral obligations to ensure the public is fully aware, and given full opportunity to comment upon, the proposal to place an LNG export facility in the heart of our Delaware River community so close to residential communities, including vulnerable populations such as children. We urge and request that you take a step back; that you provide full and accurate information to the public about this project, including the LNG exports; and that you give the public a full 90 days to review and comment once that information has been released. We also urge that you fully comply with NEPA, and that means undertaking a full EIS review, including associated public comment.

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<sup>34</sup> [Unanswered Questions About the Economic Impact of Shale Gas Exports: Don't Jump to Conclusions. Comments on NERA Study](#), prepared by Jannette M. Barth, Ph.D., Economist, Pepacton Institute LLC, Dec 11,2012.

<sup>35</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>36</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>37</sup> CRS Report for Congress, Liquefied Natural Gas (LNG) Infrastructure Security: Background and Issues for Congress, Sept 9, 2003.

<sup>38</sup> [Will LNG Exports Benefit the United States Economy](#), Synapse Energy Economics Inc, January 23, 2013

Respectfully & Urgently,



Maya K. van Rossum  
the Delaware Riverkeeper  
Delaware Riverkeeper Network



Tracy Carluccio  
Deputy Director  
Delaware Riverkeeper Network

Attachments:

1. *Plan to revive old South Jersey industrial site draws fans and fears*, Philadelphia Inquirer, July 24, 2016
2. Letter to Captain Scott Anderson, Captain of the Port, USCG Sector Delaware Bay, from AcutTech, November 16, 2017

Cc: Captain of the Port, U.S. Coast Guard Sector Delaware Bay



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November 16, 2017

Captain Scott Anderson  
Captain of the Port, USCG Sector Delaware Bay  
ATTN: Facilities and Containers Branch  
U. S. Coast Guard  
Sector Delaware Bay  
1 Washington Avenue  
Philadelphia, PA 19148

Re: Letter of Intent for Repauno Port and Rail Terminal, Gibbstown, New Jersey

Dear Captain Anderson:

Delaware River Partners LLC ("DRP") proposes to site, construct, and operate a multi-use, deep-water port and logistics center that may include a variety of separate uses including handling of imported and exported automobiles, other bulk freight and liquid energy products including, but not limited to liquefied petroleum gas ("LPG") and liquefied natural gas ("LNG"). LPG is classified as a liquefied hazardous gas ("LHG") by 33 C.F.R § 127.005.

The focus of this submission is a joint LNG / LHG facility which will be referred to as the "Project". In accordance with the requirements contained in 33 C.F.R. § 127.007, DRP is pleased to submit the following information about the Project. Please note that at the appropriate time, DRP will make the necessary submission(s) to the COTP pursuant to 33 C.F.R. §§ 126 and 154 as it relates to the other proposed uses.

Given the common stakeholders involved throughout the approval and assessment process, as well as the interdependent risk factors that must be examined, DRP requests that the LNG and LHG be examined jointly through a combined Waterway Suitability Assessment ("WSA") that will accurately represent the envisioned operations of the proposed Project. Enclosed with this Letter of Intent is a Preliminary WSA.

The Project would be operated at the site of the proposed Repauno Port and Rail Terminal ("Repauno Facility"), which is located on a 218-acre portion of a 1630-acre tract formerly known as the Dupont Repauno Works at 200 North Repauno Avenue in Gibbstown, Gloucester County, New Jersey. The Repauno Facility will be consistent with other industrial facilities along the riverfront.

The Project's LNG operations will maintain an export capacity of approximately 1.5 million metric tonnes per annum ("MTPA") (roughly 1,670,000 BBL per month). The LHG operations will maintain an

export capacity of approximately 9,600,000 BBL per annum (800,000 BBL per month). Notably, LNG, LHG, or other hazardous or non-hazardous cargo operations will not run concurrently, as the single-berth wharf only permits one vessel to dock at a given time for a single commodity.

**1. Name, address and telephone number of the owner and operator**

The Project will be owned and operated by DRP, a limited liability company organized under the laws of the State of Delaware, which is doing business as Repauno Port and Rail Terminal. The address and telephone number for DRP is:

Delaware River Partners LLC  
d/b/a Repauno Port and Rail Terminal  
200 North Repauno Avenue  
Gibbstown, NJ 08027  
Phone: 856-224-7067

**2. The name, address, and telephone number of the Federal, State, or local agency having jurisdiction for siting, construction, and operation**

The lead agency with jurisdiction over the Project is the New Jersey Department of Environmental Protection ("NJDEP"). NJDEP will have the responsibility of reviewing the siting, environmental and safety aspects of the project and preparing the environmental documents required pursuant to the agency's governing laws and regulations. The mailing address and telephone number for general inquiries are:

New Jersey Department of Environmental Protection  
Bureau of Release Prevention  
401 East State Street  
Mail Code 22-03D  
P.O. Box 420  
Trenton, NJ 08625-0420  
Phone: 609-633-0610

In addition to the siting and environmental reviews by NJDEP, other agencies participate in the process, such as the U.S. Department of Energy for authorization to export LNG to both Free Trade Agreement and Non-Free Trade Agreement countries, and the Greenwich Township and Gloucester County Planning Boards for related local site plan and construction approvals. A Section 10/404 permit for construction of the Repauno Facility is pending before the U.S. Army Corps of Engineers ("USACE").

### **3. Name, address, and telephone number of the Repauno Facility**

The project name is "Repauno Port and Rail Terminal." The project management offices and point of contact are:

Mr. Jimmy Osman  
V.P. Engineering & Development  
Repauno Port and Rail Terminal  
200 North Repauno Avenue  
Gibbstown, NJ 08027  
Phone: 856-224-7067

### **4. The physical location of the Project**

The Project will be located on a portion of the Repauno Facility currently being redeveloped by DRP on the site of a former industrial facility along the Delaware River. The Repauno Facility will feature a single, multi-use, deep-water berth and associated port and logistics center facilities, including the proposed Project. The Project will be located at 200 North Repauno Avenue in Gibbstown, Gloucester County, New Jersey, at river mile 86.5 and at Latitude N 39.846/Longitude W 75.296. The Project is adjacent to the Tinicum Range of the Delaware River Channel. A site location map is shown in Figure 1, a site plot plan showing the major components that are planned for the Repauno Facility are shown in Figure 2, including the alignment of the LNG and LHG operations. Figure 3 shows a more detailed view of the wharf.

Figure 1 – Proposed Repauno Facility Location

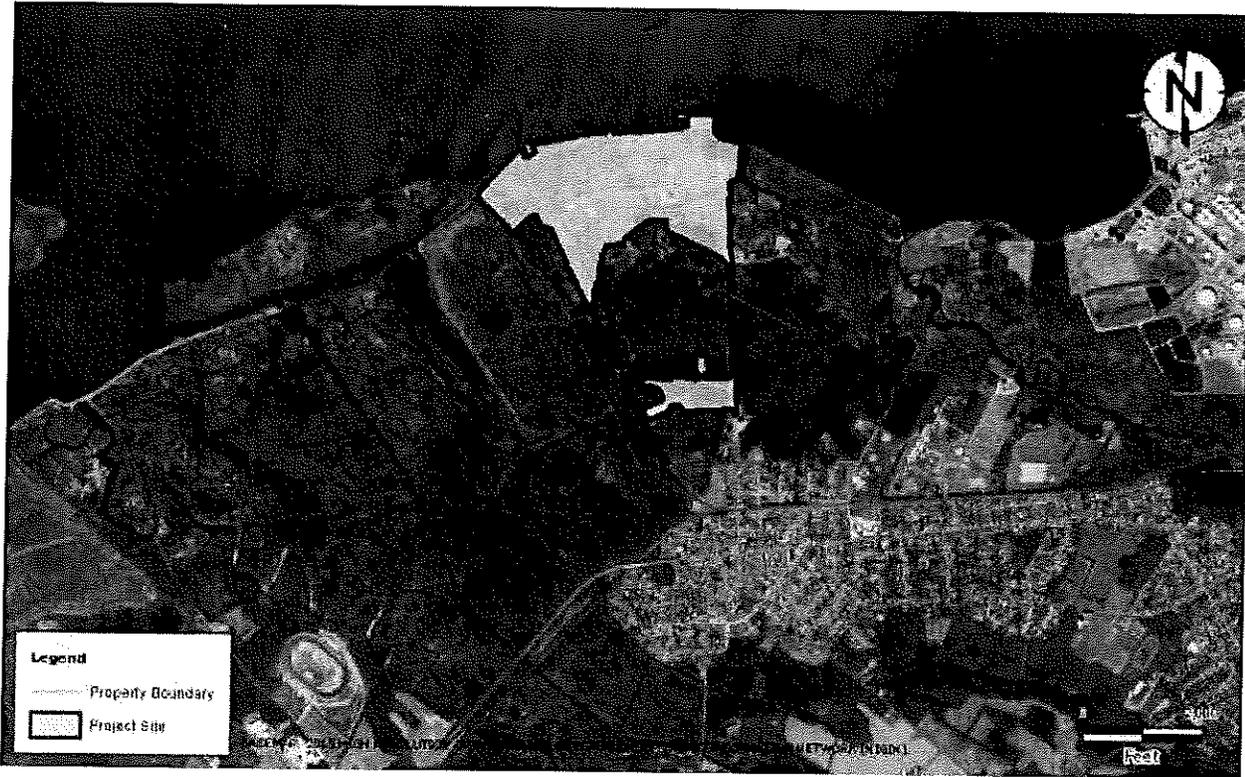


Figure 2 - Proposed Repauno Facility Layout

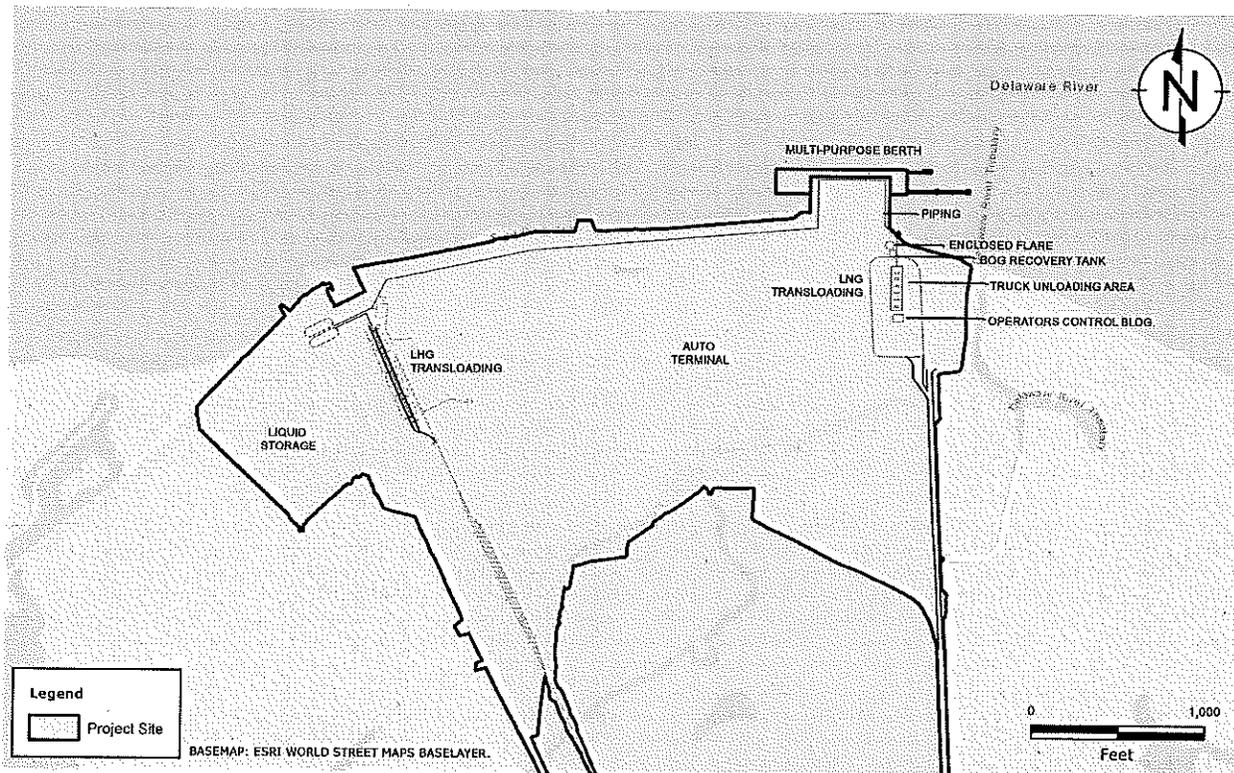
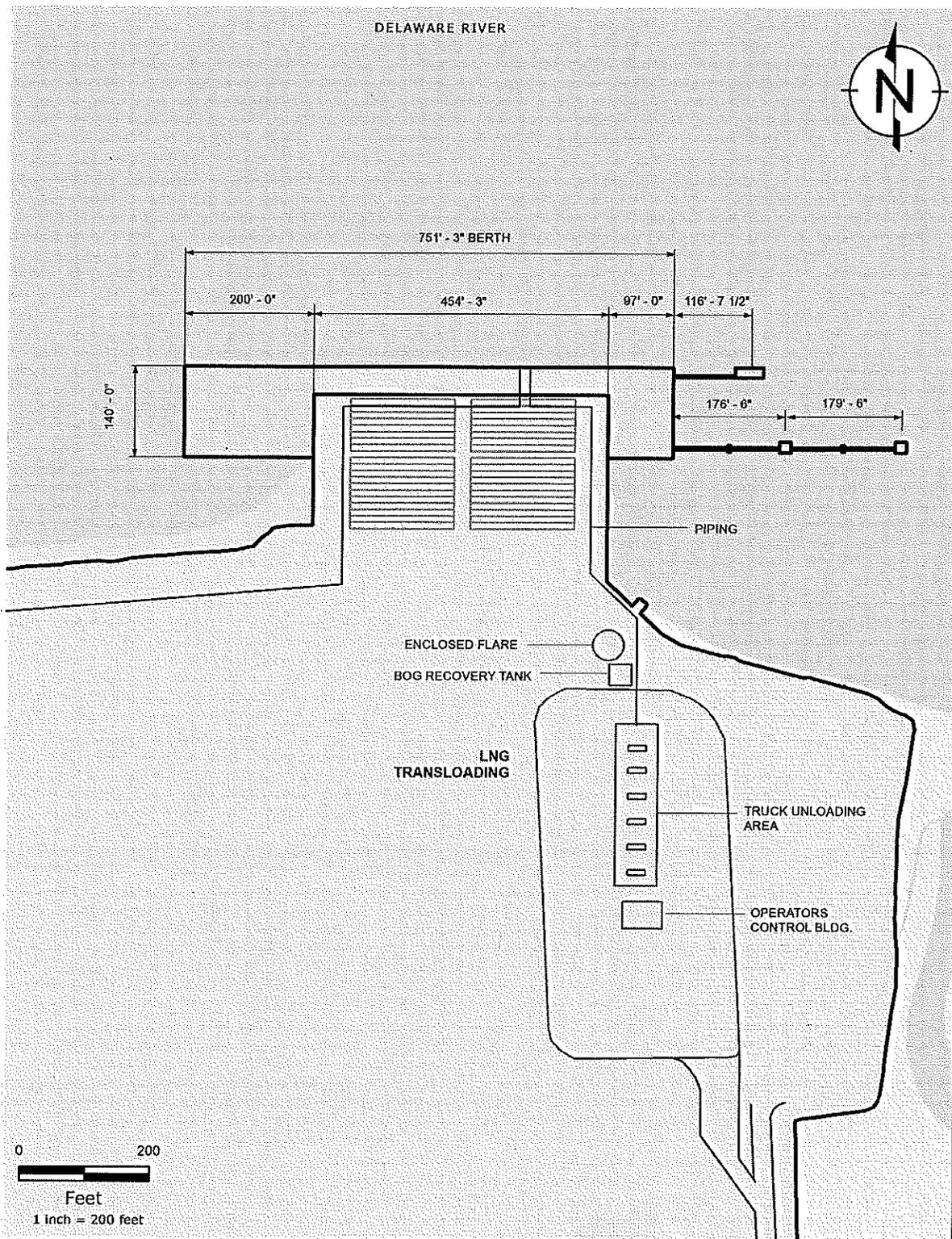


Figure 3 -Proposed Repauno Facility Wharf Layout



## **5. Overview of the Proposed Project**

The Applicant will develop a multi-purpose port facility that will, among other things, provide transloading of LNG and LHG for export. LNG would be delivered to the facility only via trucks and/or rail and pumped directly onboard LNG carriers (“LNGCs”) for export. This process eliminates the need for large-scale, onsite LNG storage or liquefaction while providing an export capacity of 1.5 MTPA (20 MM BBL). Loading a berthed LNG tanker with an expected load of 830,000 BBLs will take an average of 15 days.

LHG would be delivered via railcars or truck, and will be stored onsite. Loading a berthed LHG tanker with an expected capacity of 400,000 BBLs will take an average of 11-12 days.

## **6. Description of the LNG Handling Facility**

The Project would be capable of handling LNG or LHG as described in Sections 6 and 7 hereof. LNG and LHG operations or other cargo deliveries will not run concurrently, as the single-berth wharf only permits one vessel to dock at a given time. For the purposes of this Letter of Intent and the Preliminary WSA, each of the potential maximum yearly LNG and LHG ship calls are analyzed herein. Importantly, however, these projective ship calls represent potential alternatives; they are not cumulative.

The Project will be designed as a modular system to ensure efficient throughput at the facility. The proposed design will allow LNG trucks to unload at a new truck unloading rack located at the east side of the proposed Project site, and south of the new multi-purpose dock. (See proposed Project layout in Figure 2). Notably, the onsite configuration is presently under evaluation and is subject to change during the detailed design of the Project, including the possibility of delivering LNG to the facility via rail.

- LNG will be delivered to the facility through third party LNG trucks. The project is proposing an LNG facility with an initial capacity of up to approximately 1.5 million MTPA of LNG (roughly 1,670,000 BBL per month).
- Product will be pumped directly into the LNGC from the truck rack through ~1,000' long (10" – 12" diameter) vacuum-insulated line via loading arms.
- The new truck rack will consist of a 12-lane rack with 6 unloading pump skids (2 pumps per skid - double sided), and will be capable of unloading 12 LNG trucks simultaneously. (Typical MC-338 DOT LNG Truck has a tank capacity of 290 BBL, but a maximum liquid fill of 260 BBL).
- The proposed capacity of an LNGC that will export LNG from the facility is approximately 1,070,000 BBL, but the maximum liquid fill capacity during loading is 833,330 BBL, in order to accommodate the nominal loaded draft of 40'.
- The LNG transfer line to the LNGC will be sized to handle approximately 2,500 GPM. The estimated volume to be transferred over a 24-hour period is 57,140 BBL. (16 hours actual unloading time and 6-8 hours for hookup, disconnect, and documentation). The truck rack will be able to handle 200-220 trucks per day.

- Loading of a berthed LNG tanker will therefore take an average of 15 days, resulting in approximately 24 LNGC calls on the Project per year, and a total capacity of approximately 20 MM BBL per year (1.5 MTPA).

Boil-Off Gas (BOG) and gas removed from the berthed LNGC will be collected via a vapor line and could be handled in any of the following configurations:

- Process BOG and vapors are routed through a small capacity liquefier; then pushed back into the LNGC. The system consists of a cold box, compressor, N<sub>2</sub> tank and a cold storage bullet tank (1430 BBL capacity).
- Flare the BOG and vapors.
- Collect BOG and run through a gas separator for sale to the grid. (This is to be reviewed with the local utility company).

The LNG handling facility will include a Safety Flare and Vent System for emergency purposes. This system will also provide relief to the LNGC vapor return and piping systems.

### **The LNG carrier's characteristics and the frequency of the LNG export shipments from the Project**

Annual waterway transit information will be coordinated with local Pilots. The Project is being designed with berthing and mooring configurations to accommodate LNGCs. Berthing and mooring configurations will be able to accommodate a typical Aframax class LNGC with capacities up to 170,000 m<sup>3</sup> (1.1 MM BBL) (820.2' LOA, 144.4' beam, 40' nominal loaded draft), but the loading capacity will be limited to 833,330 MM BBL in order to accommodate the nominal loaded draft of 40'. There will be approximately twenty-four (24) vessel arrivals each year over a fairly even time period. This results in an estimated two (2) vessels per month.

## **7. Description of the Liquefied Hazardous Gas (LHG) Handling Facility**

As noted above, the single-berth wharf only permits one vessel to dock at a given time. For the purposes of this Letter of Intent and the Preliminary WSA, both the maximum yearly LNG and LHG ship calls are analyzed herein. However, these operations would not run concurrently.

### **LHG Storage**

LHG will arrive at the proposed Project site via rail cars and will then be pumped off into storage tanks. Total onsite storage for this option is ~100,000 BBLs. The vapors from the storage tanks, in addition to BOG from the vessel are compressed, condensed, and then returned to the storage tanks. It is anticipated that a Thermal Oxidizer would also be provided for emergency relief.

Notably, the on-site configuration discussed herein is presently under evaluation and is subject to change during the detailed design of the Project.

## **LHG Product Shipping**

The LHG shipping facilities consist of two LHG tanker loading pumps, each with a rated capacity of 1,750 BBL/hour, a 16" loading line, and an 8" vapor return line, each of which is fitted with fully articulated loading arms (Sizes to be confirmed in the design phase). The 400,000 BBLS refrigerated LHG tanker (Panamax class vessel with 40' nominal loaded draft) will be utilized as a short-term storage vessel during loading periods, enhancing the storage capacity of the facility for the duration of the LHG tanker's berthing. The LHG tanker will dock for approximately 11-12 days for loading operations.

The piping system will be designed as a 300# system to coincide with the pressure ratings of adjoining equipment, including the storage tanks. The vapor generated during the process is recycled to its respective tank. The loading and vapor return arms are then connected to the docked vessel and loading commences at a minimal rate. As conditions in the loading system allow, the loading rate may be increased up to the maximum rate of ~3,500 BBL/hour.

The proposed Project site will include a 20-rail car unloading rack (2x10) capable of offloading LHG at a rate of ~14,000 BBL/day using two 1,750 BBL/hour pumps. These products would be stored in storage tanks built to ASME Sec. VII specifications. Using two 1,750 BBL/hour pumps, the product is transferred from the storage tanks to the berthed vessel via two 16" dock lines for short term storage and eventual export. Cargo will be refrigerated using the LHG tanker's refrigeration system. The associated on-site LHG tank farm could occupy 3+/- acres to accommodate the tanks and associated equipment.

### **The LHG tanker's characteristics and the frequency of the LHG export shipments from the Project**

Annual waterway transit information will be coordinated with local Pilots. The Project is being designed with berthing and mooring configurations to accommodate LHG tankers. Berthing and mooring configurations will be able to accommodate Panamax class LHG tankers with a capacity of 400,000 BBLS. As such, there could be as many as twenty-four (24) vessels calling on the Project each year over a fairly even time period. This results in an estimated vessel arrival twice a month.

## **8. Description of Non-LNG-and-LHG Cargo Vessels**

In addition to LNG and LHG, a variety of cargo vessels (excluding all LNGCs and LHG tankers) could call on the proposed Project. These vessels will transport commodities such as Roll-on/Roll-off ("RoRo"), Break Bulk, and other bulk liquids, potentially including crude oil and refined products. It is important to note, however, that given the constraints of the single multi-purpose berth, if the full number of projected LNG and/or LHG ships call on the Repauno Facility (*i.e.*, 24 LNG and/or LHG vessels per year), no additional cargo types could be accommodated. In short, the cargos and ship calls identified herein are expressed as alternatives; they are not cumulative.

The potential additional cargo types are briefly described below:

- *Roll-on/Roll-off*: A portion of the Repauno Facility could be reserved for transit, storage, and processing facilities for wheeled cargo (i.e., automobiles) transported by RoRo vessels. The Repauno Facility could include facilities for vehicle preparation, intermodal rail transfer, and truck-away loading areas.
- *General and Break-Bulk Cargo*: A portion of the Repauno Facility could also handle perishables, general freight, and break-bulk cargo, including such commodities as fruits and vegetables and other refrigerated goods.
- *Bulk Liquids*: A portion of the Repauno Facility could provide energy product storage. In addition to the liquid petroleum gases identified earlier (including propane and butane), the Repauno Facility could also provide storage for refined petroleum products and crude products.

The multi-purpose berth would be able to accommodate cargo vessels with a maximum length of approximately 870 ft., maximum width of approximately 145 ft., and nominal loaded draft of 40 ft. Vessels would use the Federal navigation channel to move to and from the Repauno Facility. As noted above with respect to the LNG/LHG Project, the single-berth wharf only permits one vessel to dock at a given time. Thus, LNG/LHG and other vessels would not call at the Repauno Facility concurrently. As compared to the above-referenced berthing times for LNG/LHG vessels, a non-LNG/LHG vessel would be at the berth for approximately 2 days during loading/unloading. Thus, these vessels may call on the facility no sooner than every 2 days.

## 9. Description of Annual Vessel Traffic

As summarized on Table 1-1, it is estimated that the LNG/LHG Project would result in approximately 24 LNG or LHG vessels calling on the Repauno Facility in a given year. The potential number of LNG or LHG vessel calls are expressed as independent maximums for the purpose of the within Preliminary WSA. However, since the single, multi-purpose berth can only accommodate one ship at a time, vessels will not call on the Repauno Facility concurrently and this projected vessel traffic is not cumulative.

**Table 1-1: Alternative Utilization of Multi-Purpose Dock for LNG/LHG Project**

<b>Commodity</b>	<b>Annual Volume (Estimated)</b>	<b>Units</b>	<b>Vessel Fill Capacity (Estimated)</b>	<b>Annual Number of Vessels (Estimated)</b>
<b>LNG</b>	20,000,000	BBL	833,330	24
<b>Liquefied Gases</b>	9,600,000	BBL	400,000	24

Additionally, annual cargo ship calls were estimated for the other projected cargo commodities that could be handled at the Repauno Facility. It is estimated that the Repauno Facility could handle a maximum of 91 RoRo vessel calls, 11 break-bulk vessel calls, 13 refined product, and 6 crude oil calls. Again, these projected cargo calls are expressed as anticipated maximums, which would not be cumulative and would be reduced by the number of LNG and LHG vessels that call at the Repauno Facility due to the constraints of the single, multi-purpose berth discussed above. If the full number of projected LNG and/or LHG ships call on the Repauno Facility (*i.e.*, 24 LNG and/or LHG vessels per year), no additional cargo types could be accommodated. In short, the cargos and ship calls identified herein are expressed as alternatives; they are not cumulative. The type and total number of vessel calls will be driven by market demand and berth availability in the region.

## **10. Figures**

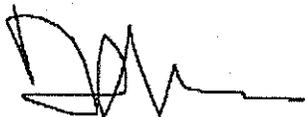
- 1) Proposed Repauno Facility Site Location
- 2) Proposed Repauno Facility Site Layout
- 3) Proposed Repauno Facility Wharf Layout

## **11. Attachments**

- A) NOAA Office of Coast Survey Navigation charts of waterway channels and highlighted LNGC/LHG tanker route.
- B) Commercial, industrial, environmentally sensitive, and residential areas within 15.5 miles of the project site adjacent to the waterway.
- C) Map of waterway channel showing environmental sensitive areas adjacent to the surrounding area.
- D) Preliminary WSA that has been prepared in accordance with the guidance contained in U.S. Coast Guard (“USCG”) NVIC 01-2011.

If the USCG has any questions or requires any additional information or clarification, please feel free to contact Mr. Jimmy Osman, DRP's Vice President of Engineering & Development at 856-224-7067 or [josman@repauno.com](mailto:josman@repauno.com). AcuTech is acting on behalf of DRP as their designated consultant for preparing the WSA.

Best regards,

A handwritten signature in black ink, appearing to be 'D. Moore', with a horizontal line extending to the right.

On behalf of Delaware River Partners, LLC.

David A. Moore, PE, CSP  
President & CEO  
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## Plan to revive old South Jersey industrial site draws fans and fears

by David O'Reilly, Staff Writer, Posted: July 24, 2016



MICHAEL ARES / STAFF PHOTOGRAPHER

Outside a vast brownfield in Gibbstown that is home to crumbling roads, empty storage tanks, and vacant sheds, a modest brick sign points to both the gritty past and the greener prospects of Gloucester County's economy.

*Repauno Plant* shout its bold, stainless steel letters. Below them, the faint outline of a pried off logo whispers a bygone name: *DuPont*.

Home to a DuPont Corp. factory complex that for 120 years manufactured dynamite and the chemicals for making Dacron, the Repauno site belched gas, leaked benzene, shed asbestos, occasionally exploded, and employed thousands, earning it the affectionate nickname "Uncle DuPont" before it shut down nearly 20 years ago.

Now a 300-acre section of this 1,700-acre tract on the Delaware River appears destined to become one of the largest privately owned ports in the Northeast.

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On July 1, after two years of negotiations, Delaware River Partners L.L.C., a subsidiary of Fortress Investment Group L.L.C., acquired the site from a DuPont subsidiary. It will keep the Repauno name.

The project is welcomed by many, but also has aroused trepidation among residents that it will create new hazards with truck and rail traffic.

At the direction of state and federal agencies, DuPont undertook extensive pollution remediation of the tract starting in the 1980s. The company ceased operations here in 1999 but leased parts of it until 2004.

Underground pumps, monitored by the Department of Environmental Protection, still carry away for treatment benzene in the soil that otherwise would leach into groundwater.

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State and local leaders are confident the new port will be a positive presence in the township and county.

"This will be a big job generator," said Senate President Stephen Sweeney, whose Third Legislative District includes Gibbstown, also known as Greenwich Township. "We've been working on this since 2005."

The Repauno port will sit just two miles south of the publicly funded Paulsboro Marine Terminal, due to open this fall. They will be the first major ports built on the Delaware River in more than 50 years.

Sweeney said he was confident the state and county would find the funds to create a connector road from the port to Route 44, I-295, and the New Jersey Turnpike that would allow most truck traffic to bypass Gibbstown's residential areas.

"It's going to happen," he said.

Assemblyman John J. Burzichelli, (D., Paulsboro), chair of the appropriations committee and a former mayor of Paulsboro, echoed Sweeney's optimism.

A similar bypass road connecting the Paulsboro terminal to the highways cost \$22 million.

Like Sweeney - who as a young union ironworker found occasional work at DuPont repairing buildings after they'd exploded - many in town talk excitedly of jobs at mention of the name "Repauno."

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"It was the town," said Kevin Herzberg, 33, whose tidy brick house on Lough Lane was built on land provided by "Uncle DuPont."

"My dad, my uncle, my grandfather, my grandmother, and my great-grandmother all worked there one time or another," said Herzberg, who grew up in Gibbstown.

And no matter what DRP plans to build on the property - "even a refinery," he said - "I think it's a good thing."

No refinery is contemplated, said Gary Lewis, managing director of Manhattan-based Fortress.

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"The Repauno site has all the characteristics that a port developer looks for," Lewis explained in an email last week. "Deep water, rail access, highway access, and most importantly, proximity to major markets."

He said DRP expects to create:

Industrial warehouses for the importation and distribution of fruits, flowers and vegetables;

A "roll-on, roll-off" parking facility for the shipping and distribution of automobiles;

An 8 million gallon storage facility for butane, using an underground granite cavern on the property;

A solar grid capable of generating 20 megawatts of electricity.

Lewis declined to say what DRP paid for the site or what it expects to invest in improvements, but he projects 500 to 1,000 full-time jobs on-site if all the planned elements come to fruition.

The company declined a request by the Inquirer to tour the property. Google Maps' overhead images show several dozen buildings and tanks still standing, and numerous rectangles of concrete or asphalt where former buildings were demolished.

Fortress/DRP hopes this fall to start construction of a 207,000-square-foot refrigerated warehouse, with operations to begin by spring. Gibbstown's planning board gave the warehouse preliminary approval early this month.

Although a company prospectus last year envisioned a liquefied natural gas (LNG) facility at Repauno - disconcerting some residents and environmental groups such as the Sierra Club and the Delaware Riverkeeper - "that is no longer in our designs," Lewis said.

Just how safe and "green" the Repauno site will be under DRP's stewardship remains a matter of concern for some, however.

"This is Railroad Avenue," said 44-year-old Rich Friendlich, who had walked the half block from his home on Logan Avenue to twin railroad tracks running at right angles to his street.

Just beyond lay the open field where DRP wants to build the first of two or more refrigerated warehouses.

"The trains already come through here every 30 to 90 minutes," he said, moments after a lone Norfolk Southern locomotive chugged slowly by. "How many more will there be when they start operations?" he asked.

He and his wife, Karen Capozzi, said they are glad DRP has dropped plans for an LNG port, but butane storage worries them.

Rail carriers already park tank cars close by their home, Capozzi said. "They sit for days, and you can smell this awful chlorine smell."

"And we still haven't heard," Friendlich said, "how they plan to transport the butane."

The couple created the organization Concerned Citizens for the Development of the Repauno site. Its website is [repaunocitizens.com](http://repaunocitizens.com).

Their neighbor Emily Buchenhorst, 46, said her biggest worry is the trucks that will soon be traveling in and out of the port. They will be passing and turning less than 10 feet from her home on Repauno Avenue. "They could hit my house," said Buchenhorst, a resident for 13 years.

Mary Rogers, 61, a 37-year resident of Repauno Avenue, said she fears for the children who play and ride bicycles on her street, and worries that rumbling trucks could disturb the foundations of older homes.

And Suzanne DeRemigio, 60, who has lived 36 years on Logan Avenue, voiced fears that if there are frequent rail accidents in Gibbstown, such as the 2012 Conrail chemical spill in neighboring Paulsboro, "we wouldn't be able to sell our houses."

Greenwich Township Mayor George Shivery was emphatic, however, that he, the township council, and planning board will not allow any new industries to pose the kinds of hazards that DuPont - which manufactured the dynamite used to build the Panama Canal - inflicted.

"We grew up when all this manufacturing was in full bloom," Shivery, 69, recalled. "The acid fumes would put spots on your aluminum siding, and the cancer rate, the asbestosis, was just unbelievable. We all had parents and great-grandparents whose lives were shortened by it.

"We just didn't know about those problems then. Now we do. We're very sensitive to these issues," Shivery said.

"We won't want anything out there that goes 'Boom!' "

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856-779-3841

Posted: July 24, 2016 - 3:01 AM

**David O'Reilly, Staff Writer**

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