

**Testimony of Myron Arnowitt, Pennsylvania State Director,
Clean Water Action**

**EPA Public Hearing on
Proposed Air Pollution
Regulations on Oil and
Gas Extraction Operations**

**September 27, 2011
Pittsburgh, PA**



On behalf of Clean Water Action's over 120,000 members in Pennsylvania and one million across the country, I would like to thank EPA for their strong proposal to restrict air emissions from oil and gas extraction operations. EPA regulations of these large pollution sources are urgently needed here in Pittsburgh and in many other communities. Unfortunately, gas drilling has been poorly controlled by state governments and we desperately need the federal government to take a strong role in protecting public health and the environment.

The photograph above of a Marcellus Shale gas well being flared was taken from the backyard of a Washington County, Pennsylvania resident. This is one of the most drilled regions of our state, just outside of Pittsburgh. What is important for EPA to consider is that this operation is in fact in someone's backyard. Pennsylvania allows gas wells as close as 200 feet from a residence. Any rules on air emissions must take into account that people are living extremely close to these pollution sources. We should not be protecting people 'on average'. We need to protect everyone living near gas drilling.

A second important consideration for EPA is that these rules are urgently

Philadelphia

1315 Walnut Street
Suite 1650
Philadelphia PA 19107
Tel: 215.545.0250

Harrisburg

115 Pine Street
First Floor
Harrisburg, PA 17101
Tel: 717.233.1801

Pittsburgh

100 Fifth Avenue
Suite 1108
Pittsburgh, PA 15222
Tel: 412.765.3053

Lehigh Valley

901 North New Street
Bethlehem, PA 18018
Tel: 610.691.7395

www.cleanwateraction.org/pa

needed. New air pollution rules can take a long time to be enacted, but we need these rules in place now. There is no moratorium on permits for the Marcellus Shale in Pennsylvania. We already have 3,900 Marcellus wells drilled here. And Pennsylvania DEP has issued 8,400 permits to date, with 60 permits being approved every week, so we know many more are planned. Any delay in putting restrictions in place means allowing thousands of new pollution sources in Pennsylvania that will have a significant impact on our health.

Pittsburgh and the southwest region of Pennsylvania already suffers from poor air quality, including failing to meet federal Clean Air Act standards for ozone and fine particulate matter. Some of the world's largest industrial sources from the coal, steel, and chemical industries, plus thousands of diesel vehicles, have placed a heavy health burden on a region that has many residents without health insurance. We already have local school districts in Allegheny County with asthma rates as high as 37% (Northgate school district, near the industrial area of Neville Island). Adding pollution from natural gas production in the Pittsburgh area could be an air quality hole we could be spending decades to dig ourselves out of.

EPA needs to ensure that these rules are put into place quickly and are the best they can be. Best available control technology should be a standard requirement for all oil and gas operations. All significant sources of air emissions must be included in the rules, such as the thousands of open air frac pits that accompany drilling sites. Remember that these pits can also be only a couple hundred feet from where people live. All relevant pollutants should be directly controlled including methane and hydrogen sulfide. Finally, flaring, such as pictured above, should be completely prohibited. It is simply irresponsible to allow the gas industry to start production at a well, before they have a way to safely control the flow of hazardous emissions.



In closing, I would like to again thank EPA for coming to Pittsburgh and for issuing these important rules. Many residents of Pennsylvania have found our state government extremely unresponsive to our concerns regarding the rush to drill for natural gas here. We are looking towards federal agencies such as EPA to step up to the plate and provide the protect we all deserve.