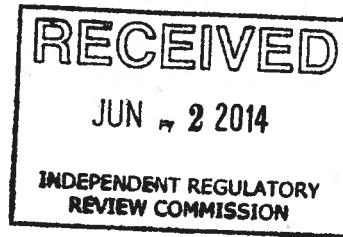


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**LEAGUE OF WOMEN VOTERS®
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**Testimony Given to the Environmental Quality Board
Proposed Rulemaking
Norristown, PA May 28, 2014
[25 PA. Code CHS, 121 AMD 129]
Additional RACT Requirements for Major Sources of NOx and VOCs
[44 Pa.B. 2392] April 19, 2014]**

I am Elizabeth Tatham, Vice President of the League of Women Voters of Pennsylvania for Issues and Action, speaking on behalf of the League. Thank you for the opportunity to comment on the proposed amendments to PA. CODE, Chapters 121 and 129 to adopt presumptive reasonably available control technology (RACT) requirements and RACT emission limitations for certain major stationary sources of oxides of nitrogen (NOx) and volatile organic compound (VOCs).

The League of Women Voters has a strong commitment to protecting our environment based on research, getting input from different perspectives and reaching consensus positions. These positions lead to advocacy, an important part of League work on the national, state and local level. The League believes that natural resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health.¹ Because of this longstanding commitment to protect the environment and public health, the League would like to express deep concerns about a major aspect of the proposed rulemaking.

1. <http://www.lwv.org/content/natural-resources>

Additional testimony will be given by our Board President at tomorrow's hearing, addressing additional concerns the League has that have led us to the conclusion that some of the proposed changes are not in the best interest of the people of our Commonwealth and especially public health protection.

The Clean air Council and other nonprofit environmental organizations will provide a more detailed analysis of the proposed changes and how they will most likely affect Pennsylvania's "Ambient Air Quality," if approved by your board and accepted by the EPA. I would therefore like to focus my remarks here on the proposal to address emission reductions by allowing plants that were in existence on or before 2012 to "average" results for both Volatile Organic Compounds and Oxides of Nitrogen. Averaging is proposed on a facility-wide or a system-wide basis or both on a rolling monthly basis. Owners and operators could petition for operating permit modification and an alternate compliance schedule in order to report in the proposed system.

While facilities that are 25 years old and older will undoubtedly face greater compliance challenges, it is important to continue to require all stationary sources of air pollution to report on a daily basis and to record those results individually rather than in the aggregate. It is the individual "spikes" in air pollution that are especially dangerous to vulnerable populations which include babies in utero and pregnant women, small children (due to low body weight), people who are already ill from other causes and the frail elderly. According to the Clean Air Council one single day and even just a few hours when these hazardous pollution readings have spiked, can lead to accelerated illness or premature deaths.

Besides blurring or obfuscating the facts, the proposed system of reporting aggregate, rather than individual pollution results, would give the impression that emissions are less hazardous to human health or pets, than is actually the case and it is less likely that steps will be taken to address problems.

As a mother and a grandmother, I'd like to share an analogy from a personal perspective. If my child's temperature today and it is 105 degrees, I would

know that a doctor is needed and the child could have serious complications or even die. However, if I average it with yesterday's temperature of 100 degrees, I would feel that 102.5 degrees isn't a terribly high fever. If I then add last week's normal temperature, I might not even notice that anything is wrong and measure the fever since the temperature is just slightly elevated at 101 degrees. So that, "averaging" provides a false sense of security.

With many new oil and gas wells, compressor stations, impoundments (frack wastewater ponds) and other facilities that are related to horizontal or multi-directional gas and oil extraction added every year, it is extremely important to count all sources of pollution emission and to have government and the different industries working together to protect our air and water. Attached is the testimony of two people from the Dimock area who testified at the FERC hearing on the construction of the Constitution Pipeline that explains some of the health hazards that exist near compressor stations and other polluting infrastructure near natural gas wells.

I will also leave you the abstract of a recent study done by several departments of Colorado School of Public Health, Aurora, Colorado published in Environmental Health Perspectives last month that suggests that birth defects were significantly higher if the mother's residence was in close proximity to Natural gas development within a 10 mile radius. Flaring of gas wells, venting of compressors and leaking of pipelines and other equipment all add to "stationary facility pollution." The study of more than 120,000 births between 1996 and 2009 in rural Colorado should be duplicated in heavy drilling areas of Pennsylvania and steps taken to protect our unborn children and very young children who are at highest risk.

The League would like to suggest that warning systems be devised to so that people can be alerted that a compressor station will vent, which happens every time it is turned on or off and also when the pressure reaches a certain level. Warnings should also be given when additional hazards exist, such as a heat inversion or a storm is approaching (chemicals can be blown 200 miles).

In summary, addressing emission reductions is critical to public health, especially in certain counties of our Commonwealth. We believe that employing a system of "emission averaging" of Volatile Organic Compounds and Nitrogen oxide is not in the best interest of Pennsylvania residents and visitors and it would set a precedent that could be followed in other areas of reporting hazardous conditions. The people have a right to know and our EPA and this Environmental Quality Board have the responsibility to keep us safe. So does the EPA and we encourage all to deny this request. As the December 19 ruling of the PA Supreme Court made clear, our Constitution – Article I, section 27 gives us those protections. Thank you for giving us the League this opportunity to provide input on a most critical issue.

TESTIMONY GIVEN AT FERC APPROVAL HEARING OF THE CONSTITUTION PIPELINE

From: Barbara Clifford [<mailto:bclifford49@gmail.com>], a resident of the Dimock area.

Subject: BESC comment at FERC hearing on the Constitution Pipeline, on 4/3/14, 7:00 p.m. at Blue Ridge High School, New Milford, PA

My name is Barbara Clifford, I am a member of the Executive Council of BREATHE EASY SUSQUEHANNA COUNTY, BESC, and I am reading the following comments on behalf of BESC. Our Mission and Goal is "To protect regional air quality and health of communities in Susquehanna County, Pa from potentially harmful air emissions released through the processes of shale gas extraction, production and transport." We therefore ask FERC to deny a certificate of convenience, eminent domain, to Williams and Cabot for the CONSTITUTION PIPELINE. As the Constitution Pipeline Project would absolutely induce development in our county and absolutely worsen our air quality, we ask FERC to deny the project outright.

We want FERC to acknowledge Williams use of segmentation, showing a lack of transparency and honesty about concern for our community. Williams continues to state the Williams Central Station is not part of this FERC project thereby evading any required Environmental impact statement for our county. We further ask FERC to require Williams and Cabot to do a comprehensive air study from upstream to midstream to characterize the air pollution during drilling, fracking, flaring/green completions, pipeline fugitive emissions, and dehydrators and compressors. We ask that fugitive emissions be part of this study and that the PICARRO SURVEYOR be employed.

We ask for an independent team of researchers representing all stakeholders conduct this comprehensive air study to also evaluate cumulative public health impacts. We ask for Continuous Emissions Monitoring Systems be employed in this study at all natural gas sites and for the data to be totally transparent for public review. We recommend Dr Michael McCawley, Dept Chair, West Virginia School of Public Health, Dr Robert Jackson, Duke University, Dr Theo Colbourne, Endocrinologist, Dr Marilyn Howarth, University of Pennsylvania Center for Excellence in Environmental Toxicology, and Dr David Brown of the Southwest Environmental Health Project be consulted on and participate in designing and implementing this comprehensive air and public health study

Thank You.
Barbara Clifford
Prospect Street
Montrose, PA

Subject: Rebecca Roter's comment to the FERC environmental panel hearing at Blue Ridge, April 3, 2014

Constitution pipeline - FERC EIS Comments

COMMENT FROM LAST NIGHT'S FERC HEARING for the Constitution Pipeline

My name is Rebecca Roter and I live less than a mile from the Williams Central Compressor Station. Since the weather has warmed up I can hear the low frequency vibration rumble from this station 24/7; this sound is associated with VibrioAcoustic Disease which can among other things affect cardiac function. If I can hear it that means the air is blowing my way and so are all the toxic air emissions like benzene formaldehyde nitrogen oxides pm 2.5 and more hazardous air pollutants per the PA DEP Air Pollution Permits that bring along known human health risks ranging from headaches nosebleeds sore throats to cancer etc. I cannot help but wonder if these toxic air emissions blowing my way have anything to do with my recent sore throat ear ache and general upper respiratory symptoms . Williams still denies the central station is the beginning of their ferc project the 30 inch transmission line the constitution pipeline which lets them off the hook for any accountability to our community for any comprehensive environmental impact study,cumulative air and health impacts, real esate devaluation, increased truck traffic,road damage, induced buildout and general safety living around all the infrastructure . We have no setbacks for any infrastructure except compressors, which is a mere 300 feet. This is a dangerous industry happening in our backyards and no one is accountable to us for transparency or our safety. The services comparable to WILD WELL services out of Houston Texas were required twice that I know of in the past year in my Township to deal with dangerous out of control wells; it takes 24 hours for the emergency crew to get here. No one voluntarily tells us anything whether it is a mercaptan spill, an out of control well, a blowdown, compressor explosions and fires. There is no system to notify residents living around infrastrcture when there are incidents. We are out of the loop when it comes to public safety and transparency. A month ago a Chevron well pad exploded in Green County PA and incinerated a 300 foot radius: industry worker Ian McKee was killed. A half mile radius was blocked off for public safety. Setbacks from homes schools other human dwellings are a real safety issue in our county. I am also concerned about setback for wells pads from compressors. The Teddick Well pad is not that far from the Williams Central, if that well pad blew would the Central Station also blow which is the slated beginning of this 30 inch transmission line?

Jeffrey Wiese, PHMSA's head of safety,told a newspaper reporter the regulatory process he oversees is "kind of dying", he said (PHMSA), has "very few tools to work with" in enforcing safety rules, and he said \$2million dollar civil penalty would not hurt a major corporation. PHMSA is creating a YouTube channel to persuade the industry to voluntarily improve its safety operations and reaching out to the public to socialize the issue.

I ask FERC, need you hear more? The head of PHMSA safety flat out said he cannot protect us from this project. Deny this application as Williams and Cabot segmented the project to avoid accountability to our community, and because even PHSMA acknowledges they cannot protect us. You at FERC have an opportunity to take America back for rural communities like mine or to give a corporate partnership eminent domain to steal American land to export an American resource, natural gas, overseas maximize corporate profit leaving us with all the environmental health and socioeconomic costs. Do the right thing by America and deny this permit.

Rebecca Roter
Turnpike Road
Brooklyn PA

http://www.alternet.org/environment/colorado-investigates-spike-fetal-abnormalities-near-natural-gas-drilling-site?akid=11666.162096.wHK_O&rd=1&src=newsletter977638&t=27

 48 COMMENTS

Colorado Investigates a Spike in Fetal Abnormalities Near Natural Gas Drilling Site

A prevalence of anomalies such as low birth weight and congenital heart defects are found within a 10 mile radius of a concentration of wells.

April 1, 2014 |

The Colorado Department of Public Health and Environment (CDPHE) has called in an epidemiologist to investigate a recent spike in fetal abnormalities in Garfield County on Colorado's western slope. Stacey Gavrell, Director of Community Relations for Valley View Hospital in Glenwood Springs, said area prenatal care providers reported the increase in fetal abnormalities to the hospital, which then notified CDPHE. So far neither the hospital nor the state have released information about the numbers of cases reported, over what span of time, or the amount of the increase.

Gavrell said it is too early to speculate on the causes of the spike in abnormalities.

The report comes shortly after the February, 2014 publication in *Environmental Health Perspectives* of a study that found an association between the density of natural gas wells within a ten mile radius of expectant mothers' homes and the prevalence of fetal anomalies such as low birth weight and congenital heart defects in their infants.

The study examined a large cohort of babies over an extended period of time in rural Colorado, and specifically controlled for confounding factors that also emit air pollution, including traffic or other heavy industries. The abnormalities in infants in the study are associated with exposure to air pollutants like those emitted from natural gas wells, including volatile organic compounds and nitrogen dioxide.

A map of current drilling activity in the Garfield County area shows the number and concentration of active wells along the busy I-70 corridor between Glenwood Springs and Rifle, one of the areas of interest in CDPHE's investigation.

An Interesting Map!