

**Testimony for Control of VOC Emissions from Oil and Natural Gas Sources
Before the Pennsylvania Department of Environmental Protection
By the Southwest Pennsylvania Environmental Health Project
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Members of the Department of Environmental Protection and the Environmental Quality Board:

My name is Alison Steele, and I am the executive director of the Southwest Pennsylvania Environmental Health Project. EHP was founded in 2011 to defend public health in the face of growing concerns about unconventional shale development. We gather health information and air quality data from communities throughout the region, examine leading research from scientists and health professionals nationally and globally, and consolidate our findings in a fact-based and unbiased manner for residents in frontline communities, advocacy groups, and legislative offices.

On behalf of EHP, I wish to express my gratitude that the Department of Environmental Protection is taking steps to protect public health through this ruling on methane and Volatile Organic Compound (VOC) emissions, and also that you are providing the opportunity for public feedback through these hearings. As we know, methane is a potent greenhouse gas, 86 times more powerful than the same amount of CO₂ over a 20-year period. Unchecked methane releases pose a significant threat to our climate, but there is another concern as well, one that is less-often addressed but just as dire: the impact of methane and any accompanying VOCs on health.

Short-term exposure to some VOCs can cause irritation of the eyes and respiratory tract, headaches, dizziness, fatigue, allergic skin reactions, nausea, and memory impairment. Long-

term effects from VOCs can include damage to the liver, kidneys, and central nervous system. Two VOCs in particular (formaldehyde and benzene) are known human carcinogens.

Pollution from shale activity can travel long distances, increasing air quality problems, such as smog, and resulting in tens of thousands of additional asthma attacks every year. A 2019 study from FracTracker Alliance showed that more than one million Pennsylvanians lived within two miles of an unconventional well. 25% of these Pennsylvanians are children, who are impacted at a greater level than adults because their bodies are still developing.

Health impacts are compounded by the presence of multiple sites and multiple types of activity associated with the approximately 10,000 active unconventional wells located across the state. VOCs are released in every stage of the process, including at well pads, compressor stations, and processing plants, as well as from truck traffic and gas-fired power plants. A reduction in VOC emissions will reduce the risk of illness in those being exposed.

We at EHP encourage the DEP to further strengthen this proposed ruling by closing the loophole that exempts low-producing wells from leak detection and repair requirements. Not every well leaks, but any well could, and it could happen at any time. Because of that fact, we also encourage the DEP to eliminate the provision that allows operators to reduce inspection frequency if previous inspections have gone favorably.

Researchers have documented the myriad health impacts of emissions from shale gas development sites, and many of those researchers use Pennsylvania data. This significant health issue is quite literally in our back yards, and the DEP has the opportunity to address it head on. On behalf of EHP, we would be happy to answer any questions or provide any additional information that may be useful to this process. Thank you once again for your time and consideration.