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## Delaware Riverkeeper Network Opposes Pennsylvania's Proposed Air Emissions Permit GP-5 Calls for addressing deposition of air pollutants from gas operations on water

Harrisburg, PA – Delaware Riverkeeper Network submitted comments today to PA Department of Environmental Protection's (PADEP) Air Quality Bureau in Harrisburg regarding PADEP's proposed revisions to the General Plan Approval and/or General Operating Permit for Natural Gas Production and Processing Facilities, known as GP-5. PADEP noticed the proposed revisions in March with a comment deadline of May 2 but then extended the comment period to May 23. The revisions apply to natural gas operations throughout the Commonwealth and were necessary to address changes in US Environmental Protection Agency performance standards and national emissions standards for hazardous air pollutants.

For a copy of DRN's comments go to:

http://www.delawareriverkeeper.org/resources/Comments/PADEP%20GP-5%20Comnt%205.23.12%20submitted.pdf

DRN's comment focuses on the issue of atmospheric deposition of airborne pollutants from natural gas production and processing facilities. DRN concludes that the proposed GP-5 is not effective for the protection of human health or the environment and advocates that PADEP correct the deficiencies in the proposed permit before moving ahead.

"The deposition of pollutants emitted by natural gas operations on to water will lead to water quality degradation and provides a substantial pollution pathway that PADEP does not address in the proposed GP-5", said Maya van Rossum, the Delaware Riverkeeper. "This is a huge missing piece of the air pollution puzzle that faces all Pennsylvanians because of the dangerous pollutants the gas industry emits. The problem must be solved by addressing the whole picture, not just little bits. PADEP needs to fix this and fix it now," said van Rossum.

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drn@delawareriverkeeper.org www.delawareriverkeeper.org DRN engaged an air expert, Cherelle Blazer, MESc, of Texas to conduct a technical review of the GP-5 in regards to the issue of the deposition of air pollution on water; her report is included in the link to DRN comments above. Ms. Blazer found the proposed permit revisions to be inadequate in protecting public health and the environment because it does not go far enough in addressing the problem of deposition. Ms. Blazer recommends action be taken to analyze cumulative effects and then institute a plan to address them, to make more substantive cuts to emissions and to explore ways to prevent emissions such as restricting certain polluting activities (i.e. gas well flaring).

Ms. Blazer reviewed the scientific literature on this issue and points out that employing Best Available Control Technology (BACT), which is the primary method used in the GP-5, is simply not enough to keep air emissions from degrading the environment. In fact, the use of BACT in other parts of the country where drilling has been occurring has not resulted in effectively controlling Nitrogen and Sulfate, two of the dangerous air pollutants emitted by gas facilities that are deposited on to water. In Sublette County Wyoming where BACT is mandatory, Nitrate and Sulfate emissions have actually increased and there is evidence of atmospheric deposition in the water and on the land near gas fields there. Ms. Blazer points out that the proposed GP-5 permit can result in the same situation in Pennsylvania.

"Many pollutants are released by natural gas activities and they all must be stopped. Some of these toxics are deposited on land, vegetation, and surface water, where they cause water quality pollution that affect millions more people downstream as well as downwind. PADEP is proposing to do the same old thing - a strictly technological fix. Well, this isn't working anywhere in the nation. PADEP needs a new model – they need to prevent the pollution that is harming people and polluting our air and water," said Tracy Carluccio, Deputy Director, Delaware Riverkeeper Network.

For more information on gas drilling go to <a href="http://www.delawareriverkeeper.org/act-now/urgent-details.aspx?ld=102">http://www.delawareriverkeeper.org/act-now/urgent-details.aspx?ld=102</a>