



CENTER FOR COALFIELD JUSTICE

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RE: Oral Testimony of Center for Coalfield Justice for Public Conference for Draft Plan Approval PA-63-01001B for the ETC Revolution Cryogenic Gas Processing Plant

Good evening, my name is Seth Sherman and I am a Staff Attorney with the Center for Coalfield Justice ("CCJ"). CCJ is an environmental justice non-profit based in Washington and Green Counties made up of thousands of members both local and regional who have been on the frontlines of the environmental and human health impacts of our region's extractive industries. I would like to first thank the DEP for hosting this meeting as well as thank the many other concerned residents and organizations that have provided their testimony and input regarding this draft plan approval. This testimony is intended to supplement additional written comments CCJ will submit after this conference.

It's very telling that today's meeting is taking place at Burgettstown High School, a sensitive receptor just a few miles from the Revolution Plant. As this building is the school serving the residents who work and send their children here, who will be the most affected by the sound, light, traffic, water, and air pollution this facility produces. And many of the impacts from that pollution will specifically be because residents send their children here and get sick because of it. Even putting the laundry list of technical deficiencies aside, from inadequate monitoring procedures and insufficient emission control technology to DEP's acceptance of suspect emission limits to allow for improper permit types to apply, the on the ground experience of residents in Smith and surrounding townships necessitates that DEP use this plan approval as jumping off point to seriously consider cumulative impacts as a part of its permit review process.

JUSTICE FOR COALFIELD COMMUNITIES

The census blocks that make up the communities of Smith Township are among the most environmentally overburdened in the entire state. According to DEP's own data, many of the communities that surround Revolution are above the 95th percentile for pollution exposure. From Revolution and Harmon Creek to the numerous compressor stations, oil&gas wells, and legacy mining impacts, this community has become an environmental justice community. And while DEP has at least attempted to engage in the enhanced public participation elements of its own EJ policy, when is DEP going to hear, process, and understand the experiences of those who live in this community and use that as a basis for meaningful change in the permitting that goes on here? Because all CCJ and the residents who are here today have seen, is piece-meal expansion after piece-meal expansion, where the operators somehow manage to avoid needing a Title V permit, or are permitted not to consolidate its expansions under existing permits, all so they can be evaluated separately, often under less stringent regulations.

But by the very nature of the impacts this community has and will continue to experience, the flaws in the way DEP is evaluating these air permits are clear. DEP must begin applying cumulative impact analysis as part of the review process of permits that will operate in overburdened communities. With the DEP looking at each permit the way it does, it fails to see the big picture of how these emissions translate to community impacts, and undermines their authority and duty to provide clean air and water to the citizens of the Commonwealth as our State Constitution requires it. It's time for DEP to stop merely being the logistics network of industry and actually stand up and protect our residents from the environmental and human health impacts that Revolution causes.

Thank you,

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