EARTHWORKS

Allegheny County Board of Health Air Quality Permit Public Comment
April 13, 2026
Comments Submitted by: Melissa Ostroff, MPH, Pennsylvania Policy and Field Manager
Re: Opposition to Air Quality Permit – EQT Production Company, Leto Well Pad (1027-I001)

On behalf of Earthworks, I submit the following comment in opposition to the proposed air quality permit for the installation of a tri-ethylene glycol (TEG) dehydration unit and associated equipment at EQT Production Company's Leto Well Pad, located at 301 Oak Road, Gibsonia, PA.

The proposed project would add a significant new source of air pollution to a site already emitting a range of hazardous pollutants. The permit indicates potential increases of 39.94 tons per year of volatile organic compounds (VOCs) and 3.56 tons per year of hazardous air pollutants (HAPs), in addition to nitrogen oxides (NOx), carbon monoxide (CO), particulate matter (PM), and sulfur oxides (SOx). These emissions are not trivial, particularly given the proximity of the site to nearby residences, with homes located within approximately 650 feet of the well pad.

Cumulative Air Pollution and Public Health Risks
While the permit evaluates emissions from this project in isolation, it fails to adequately account for the cumulative impact of air pollution from existing and proposed oil and gas infrastructure in the surrounding area. West Deer Township already has three approved gas wells and this additional infrastructure was not considered as part of those approvals. This piecemeal permitting approach turns a blind eye to the real-world exposure burden faced by nearby residents.

A substantial body of peer-reviewed public health research demonstrates that communities located near unconventional oil and gas development are at increased risk of adverse health outcomes, leading to a 2020 Grand Jury report recommendation that well pads be permitted no closer than 2500 feet to homes in Pennsylvania. The Leto well pad is substantially closer to homes than 2500 feet.

VOCs and HAPs commonly emitted from oil and gas facilities, including benzene, toluene, ethylbenzene, and xylene, are associated with both acute and chronic health effects. Benzene is a known human carcinogen, and exposure to VOC mixtures has been linked to respiratory illness, neurological effects, and adverse birth outcomes. Even relatively low levels of chronic exposure can pose risks, particularly for vulnerable populations.

Sensitive Population Concerns
Publicly available screening tools such as the Pennsylvania Department of Environmental

Protection's PennEnviroScreen indicate that the surrounding community ranks in the 98th percentile for residents over age 64 and the 78th percentile for environmental effects. These indicators point to a population with heightened vulnerability to pollution exposure and reduced resilience to additional environmental burdens.

Older adults are especially susceptible to the impacts of air pollution, including cardiovascular and respiratory disease. The addition of new emission sources in close proximity to this sensitive population raises serious concerns about disproportionate health risks and underscores the need for a more precautionary approach.

Unreliable Emissions Controls and Documented Failures
The permit relies heavily on the assumption that emissions from the proposed dehydration unit and associated equipment will be effectively controlled by an enclosed combustion device (ECD). However, Earthworks' extensive field investigations call this assumption into question.

Using optical gas imaging (OGI) cameras, Earthworks thermographers have documented significant emissions from enclosed combustion devices across multiple oil and gas basins. These technologies allow for the visualization of otherwise invisible pollution, providing direct evidence of emissions that are often not captured by conventional monitoring or reporting.

From 2022 to 2024, Earthworks documented 352 emissions events at oil and gas facilities in Colorado alone. Of these, 98 events – more than one-quarter – were attributable to inefficient or malfunctioning enclosed combustion devices. These findings demonstrate that ECDs frequently fail to perform as intended, resulting in the release of uncombusted hydrocarbons and hazardous pollutants into surrounding communities.

Despite these documented failures, operators often rely on assumed destruction efficiencies rather than real-world performance data. In many cases, they do not provide empirical evidence demonstrating that control devices are operating at expected efficiency levels under actual field conditions. This gap between assumed and actual performance represents a significant regulatory blind spot and undermines confidence in the effectiveness of proposed emissions controls at the Leto Well Pad.

Earthworks has compiled OGI evidence and analyses of these issues, including documented emissions from enclosed combustion devices, which can be accessed here: https://earthworks.org/blog/flaring-in-plain-sight/

Conclusion and Recommendation
Given (1) the significant increase in VOC and HAP emissions, (2) the failure to adequately account for cumulative air pollution impacts, (3) the proximity of the site to homes and a population with elevated vulnerability, and (4) substantial evidence demonstrating that enclosed combustion devices frequently fail to control emissions as assumed, Earthworks strongly urges the Allegheny County Board of Health to deny this permit.

At a minimum, the Board should require a more rigorous analysis of cumulative impacts and enforceable monitoring requirements to verify real-world control efficiency before considering

approvall. Without such safeguards, the proposed project poses an unacceptable risk to public health and the surrounding community