Good evening. My name is Patrick Campbell, and I am here today representing the Group Against Smog and Pollution (GASP), a nonprofit organization working to improve air quality in southwestern Pennsylvania since 1969.

We are here to address the draft installation permit for the Leto Well Pad and Dehydrator. Specifically, ACHD did not require Best Available Control Technology or BACT.

Article 21 is clear: BACT is defined as the “maximum degree of reduction” achievable for a pollutant. It’s a case-by-case evaluation of the best a specific facility can actually do, once you account for factors such as energy, environmental, and economic impacts.

By contrast, the New Source Performance Standards (NSPS)—which ACHD used here—represent a least common denominator. As legal precedent and ACHD’s own framework suggest, BACT should nearly always be more stringent than the NSPS.

The NSPS is what every source can achieve while BACT is the best a specific source - in this case the Vapor Destruction Units and Dehydrator Flare - can do.

The draft permit proposes a 95 percent destruction efficiency for the four Vapor Destruction Units and the Dehydrator Flare. Why? Simply because that is what the NSPS requires. However, the permit application itself states that these units are capable of achieving 98 percent destructive efficiency for Volatile Organic Compounds (VOCs).

There is also absolutely no evidence in the record to suggest that 98 percent is technically infeasible or economically unjustifiable. When a facility’s own application proves it can destroy 98 percent of its VOC emissions, a permit allowing it to destroy only 95 percent is, by definition, not BACT.

If the technology exists and the operator admits it is achievable, ACHD should not eschew the required case-by-case determination in favor of a weaker, blanket standard.

GASP urges ACHD to revise this permit to require a 98 percent destruction efficiency. We must hold polluters to the highest standard of protection that the law—and their own equipment—allows.

Thank you.