



CITY OF PITTSBURGH
OFFICE OF THE MAYOR
MAYOR WILLIAM PEDUTO

February 17, 2020

The Honorable Tom Wolf
Governor of Pennsylvania
Commonwealth of Pennsylvania
Pennsylvania State Capitol
Harrisburg, PA 17120

Re: Water Quality Impacts of Penneco Sedat #3A Underground Injection Control Well - Located in Plum Borough, Allegheny County

Dear Governor Wolf,

We would like to begin by expressing my appreciation for your leadership as we work our way through the COVID-19 pandemic and its related economic and public health impacts. As we continue to navigate these difficult and unprecedented times, we must ensure to continue to meet the day-to-day health and safety needs of our residents, needs which include safe and reliable water and wastewater service. In Pittsburgh, our three rivers' geography and our industrial heritage make it critical to identify and address issues that may negatively affect our source water quality, as volume of water does not guarantee continued potability. Thus, we appreciate your consideration, as on behalf of the residents of the City of Pittsburgh, we share our concerns regarding the conversion of Penneco's former gas well into a brine disposal injection well.

Pittsburgh Water and Sewer Authority (PWSA) provides water service to more than 300,000 residents and businesses in Pittsburgh. In addition to 70,819 residential customers, 9,161 commercial customers, and 586 governmental and industrial customers, PWSA also serves three wholesale customers with their own customer bases. Although PWSA's industrial class of customer previously was its primary class, now the service sector, often referred to as "Meds & Eds", is the largest class of customers, with PWSA providing service to twelve hospitals and healthcare businesses.

The source of water supply for the City's water is the Allegheny River which flows from the New York border into Pennsylvania through Clarion, Armstrong, and Westmoreland counties into Allegheny County until it joins with the Monongahela River to form the Ohio River at Pittsburgh's famous Point. PWSA treats and pumps more than 70 million gallons of water a day at the treatment plant. Treated, potable water is then distributed throughout the City using a network of 964 miles of water pipe. It is with this in mind that we write to you to express my serious concern regarding Penneco's brine injection well, which is upstream from PWSA's intake and treatment plant.

We have attached a drawing showing the location of Sedat Injection Well # 3A relative to the Allegheny River and PWSA's treatment plant.

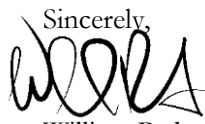
We understand that the US Environmental Protection Agency (EPA) issued a permit to Penneco Environmental Solutions LLC (PENNECO) in 2018 authorizing it to convert Sedat Gas Well #1A to an underground injection well and the Pennsylvania Department of Environmental Protection (DEP) issued

Well Permit No. 37-003-21223-00-00 to PENNECO on April 15, 2020. We also understand that there are conditions in each of those permits which are intended to mitigate negative consequences of a leak, a spill, seismic activity, or a combination of those factors. But mitigation of negative effects after the fact will not provide nor pay for potable water to the over 300,000 residents Pittsburgh. Mitigation will not provide potable water vital to our industrial or service sectors, nor will it remedy potential damage to the Pittsburgh economy.

The fluids which have been approved to be injected into Sedat Injection Well #3 consist of wastewater associated with oil and natural gas production. These are not your typical household or commercial waste streams. These fluids cannot be removed nor treated in a standard water treatment plant, such as that operated by and used to treat the drinking water supply to the City of Pittsburgh. PWSA is required to invest significant capital to address its aging infrastructure and to comply with EPA consent orders. We have managed our operations and finances to mitigate the rate impact of the required capital on customer rates. Our customers should not have to foot the bill to remedy issues created by PENNECO because it chose a high-risk location for its brine injection well. In the case of PENNECO's brine injection well, PENNECO reaps the reward and the residents of Pittsburgh sustain the risk.

In 2010, PWSA observed a significant increase in the concentration of total trihalomethanes (TTHMs), especially brominated THM species which can have potential serious human health effects, in its finished water. PWSA began to investigate the source water and found that there were elevated levels of bromide in the Allegheny River. The increase in bromide concentrations in the Allegheny River system could affect the ability of conventional drinking water plants drawing water from this source to comply with the Stage 2 Disinfectants/Disinfection Byproducts Rule.

Not even 40 years have passed since the 1988 Ashland oil spill caused one million people in 80 communities, including Pittsburgh, to be without tap water for a week. When reflecting on the lessons from that incident, we must remember that the payments made by Ashland Oil and the criminal indictments imposed did not adequately compensate residents or communities and had deep ramifications for the water quality of the Monongahela River. When considering the importance of the Allegheny River to the water supply of Pittsburgh, we urge you to revise or repeal the DEP permit granted to Penneco. We appreciate your consideration of my request and urge you to reach out to PWSA Chief Executive Officer Will Pickering (wpickering@pgh2o.com) with any questions you may have.

Sincerely,

William Peduto
Mayor of Pittsburgh


William Pickering
Chief Executive Officer
Pittsburgh Water & Sewer Authority

CC: The Honorable Patrick McDonnell, Secretary, Pennsylvania Department of Environmental Protection