

Oral Testimony provided to the RI Department of Environmental Management/Office of Air Resources Hearing on February 25, 2026 via zoom re: Renewal of the Title V Operating Permit for the Pastore Center, Cranston, RI

Good afternoon,

My name is Sheila Resseger. I have lived in Cranston, RI for 47 years. I am a retired Latin and English Literacy teacher from the RI School for the Deaf, and a former sign language interpreter at the Community College of RI. I am also a co-founder of RI4SafeTech. We at RI4SafeTech want to bring to your awareness that there is an additional air pollutant on the Pastore Center Campus, beyond the familiar pollutants covered in the Title V Operating Permit. The RI DEM/OAR does an exemplary job protecting Rhode Islanders from familiar air pollutants such as carbon monoxide, sulfur dioxide, and particulates from heavy industrial sources such as generators, storage tanks, and boilers. Also located on the Pastore Center Campus are fixed wireless, 4G/LTE and 5G installations. These emit man-made, non-ionizing, pulsed/modulated, radiofrequency/microwave radiation, also known as electromagnetic radiation (EMR) or electromagnetic fields (EMF). This radiation is emitted continuously, with minimal oversight.

Decades of scientific research have established that this invisible radiation causes adverse biological effects at the organism's cellular level, which in turn results in illness in humans, disease in flora (i.e. trees and crops), as well as disease and behavioral disruptions in pollinators and fauna. We recognize that the RI DEM/OAR does not have the authority to regulate this invisible air pollutant and will not include it in the Operating Permit at this time. Yet, the Operating Permit is not complete, as it is not protective of the public and the environment from wireless harms. In light of this, we assert that as a state agency tasked with protecting the public and the environment from harm from man-made pollutants, you do have the authority and the duty to monitor these emissions, record them, and make them accessible to the general public, as is routinely done in other countries.

We recognize that the Title V Operating Permit is compiled to ensure that sources of air pollution comply with the applicable state and federal requirements. However, the federal agency tasked with listing hazardous air pollutants, the Environmental Protection Agency, has for decades lacked the funding to investigate the harmful effects of EMR, despite the exponential increase in infrastructure and devices emitting this hazardous pollutant.

In a document recently submitted to the Senate Commerce, Science, & Transportation Committee, Subcommittee on Telecommunications & Media, Odette Wilkens, President & General Counsel of The National Call for Safe Technology, explained:

“Decades ago, the US EPA and FCC measured RF levels in various cities across the country. However **the last report on such measurements was issued by the EPA in 1986** in a report entitled “Radiofrequency Radiation Environment, Environmental Exposure Levels And RF Radiation Emitting Sources” (emphasis added)
<http://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=2000ECTQ.txt>
<https://thenationalcall.org/wp-content/uploads/2025/12/1-NC4ST-letter-to-CST-12-15-25.pdf> page 3

The EPA was engaged in research on this topic until 1996, when it was abruptly defunded. The year 1996 was the same year that the Telecommunications Act was passed, and in which the guidelines for human exposure to radiofrequency radiation were promulgated. These guidelines were non-protective at the time, and have not been updated since, despite a 2021 federal court ruling for the FCC to seriously review the voluminous evidence to do so.

In a document recently submitted to the Members of the Senate Committee on Commerce, Science, and Transportation, Theodora Scarato, Director of the Wireless and EMF Program at Environmental Health Sciences states:

“ ... The FCC also does not routinely measure or monitor emissions, nor have a robust oversight program post-deployment, leaving a regulatory vacuum in which no federal entity is meaningfully responsible for evaluating cumulative exposures, longterm health effects, or compliance for cell towers and wireless facilities in today’s dense wireless environment.” (emphasis added) (page 6)

“The FCC does not maintain a national RF radiation measurement and environmental monitoring program, despite the rapid expansion of wireless infrastructure, dense smallcell deployment, and widespread 5G rollout. This absence represents a significant gap in federal oversight. ...

“The FCC’s approach is essentially the honor system. The FCC relies almost exclusively on pre-market compliance testing conducted by or for manufacturers, with minimal postmarket surveillance and no systematic collection of real-world exposure data. This approach stands in stark contrast to practices in numerous other countries, which conduct ongoing environmental RF measurements, publish monitoring results, track changes in population exposure over time, and use this data to inform policy and enforcement decisions.

“Without a national monitoring program, the FCC lacks confirmation of compliance and empirical data on cumulative, ambient, and long-term RF exposure levels experienced by the public” (page 12)

“Numerous countries conduct routine audits of cell tower sites to ensure compliance with RF exposure limits. ... These programs often include spot checks of a defined percentage

of cell towers and wireless sites each year, mandatory reporting, and in some cases, continuous national monitoring of ambient emissions. Further, the results are often publicly posted on easy-to-understand websites.

“By contrast, **the United States has no comparable national auditing, monitoring, or enforcement program.** The FCC has not demonstrated that it conducts systematic inspections, routine spot checks, or any ongoing compliance verification of operational cell towers. ... (emphasis added)

“Out-of-compliance wireless facilities have been documented, especially in regards to rooftop sites which have been documented as failing to meet RF exposure compliance regulations for RF radiation exposure and also for issues like proper signage and containment of the high RF radiation exposure areas.” (page 13)

<https://ehsciences.org/wp-content/uploads/2026/08/FCC-Oversight-Hearing-Questions-for-the-FCC-on-Cell-Phone-and-Wireless-Radiation-Transparency-Safety-and-Compliance-Environmental-Health-Sciences-Theodora-Scarato.pdf>

As Ms. Scarato said in a recent webinar, “What you don’t measure, you can’t manage.” The federal government has not been measuring EMR emissions in the real world. Without measuring, how can risk be mitigated?

The Operating Permit as is, is non-protective of the public. Local and state governments are not preempted from measuring wireless emissions. Therefore, we request that the RI DEM/OAR conduct monitoring of emissions from the wireless infrastructure on the Pastore Center Campus, maintain reports, and make the reports readily accessible to the public.

Thank you

Sheila Resseger, M.A.

