



"Connection for Oil, Gas & Environment in the Northern Tier, Inc."  
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April 1, 2013

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477  
[RegComments@pa.gov](mailto:RegComments@pa.gov)

2013 APR -5 AM 8:51

RECEIVED  
IRRC

RE: Proposal to Amend Chapter 127, Subchapter I (relating to plan approval and operating permit fees)

Board Members:

The Environmental Quality Board is proposing to increase the base Title V annual emission fee paid by the owner or operator of a Title V facility to \$85 per ton of "regulated pollutant" for up to 4,000 tons of each regulated pollutant for emissions occurring during 2013.

We are most supportive of this increase which will provide an adequate fee to cover the costs of administering the air permit program.

With the increased emissions in the Marcellus Shale region there are many facilities which are permitted at the Title V level. We are seriously concerned about adequate staffing levels and the ability of the Bureau to adequately enforce compliance lacking a sufficient revenue stream. We are also concerned about the Bureau's ability to purchase air sampling and monitoring equipment, perform modeling analysis and demonstrations, and add our Shale counties to the air monitoring network.

While the Commonwealth has issued an encouraging press release that our air quality is much better, there was not equal fanfare of note when it came to the decreasing air quality in the developing gas fields of the Northern Tier's Bradford, Sullivan, Susquehanna, Tioga and Wyoming Counties. In fact of the top 10 counties with the 2011 highest levels of unconventional natural gas inventory emissions, 4 of 5 of the Northern Tier counties made that list with Bradford and Susquehanna Counties in the lead.

It is obvious by this increase that the Bureau has been operating at a level of insufficient funding. This is most acutely demonstrated by the fact that no permanent air monitoring network has yet been placed to gather data in the Marcellus Shale and Northern Tier Counties. It is just as reasonable and necessary for rural Marcellus Shale region Pennsylvania's to have their air resources adequately protected as much as their urban counterparts.

Therefore, we urge the Environmental Quality Board to move forward and adopt the new Title V facility fee of \$85 effective with emissions occurring with the 2013 year.

Thank you for this opportunity to submit a comment on this most necessary fee increase.

Sincerely,

A handwritten signature in cursive script that reads "Emily E. Krafjack".

Emily E. Krafjack  
President