

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Monday, June 15, 2020 3:59 PM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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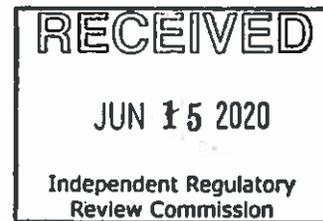


Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544).

Commenter Information:

Sharon Furlong
Bucks Environmental Action (sfurlong5@verizon.net)
133 e. Bristol Road
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Comments entered:

VOC's are dangerous in and of themselves because they turn into vapors, get dispersed easily and combine with sunlight and NO2 substances to create ground-level ozone....also a dangerous substance we all have to live with. So thank you for trying to control their emissions since the oil and gas industry is the number two producer (after the transportation industry). However, after reading the entire document and allowing for the fact that I am a Spokesperson for our Bucks County environmental watchdog group who did not have an engineering degree in her former life, this stood out: That there were numerous exemptions built into the document in the following sections:

- 129.121 Subsections a and b;
- 129.123, Subsections a, c, and d
- 129.124, Subsection b
- 129.125, Subsection c and d
- 129.126 Subsection d
- 129.127 Subsections a, b, and e

Some of the reasoning being given, (and there was a dearth of reasoning being given), was sparse and not conducive to a complete understanding of the need for an exception. Some of the exceptions were noted but not spelled out at all, so who knows what those exceptions are? Several seemed to rely on a date without explanation of why and how that date was chosen as a

benchmark or cutoff, and almost all relied on compliance being maintained and proven by the owner/operator's own records without independent analysis or monitoring ...and we all know how that goes (the fox guarding the henhouse comes to mind). Unless a better case is stated regarding exemptions, we at BEA respectfully request that these exemptions are removed or tailored with much stricter language and compliance and adherence in mind. As a citizen of my County, I would not be allowed to claim financial hardship, age, location or anything if what I was doing on my home grounds endangered other citizens . Why should an industry be allowed that leeway? Whatever I might do, short of detonating a nuclear device, it would cause much less damage than the fossil fuel industry can and already does do to millions of people, non humans, soils, plants, air and water. The industry, the owner, they get a chance to opt out? I don't think so. This needs to be changed. It is this kind of inequity that propels millions of us towards upper respiratory damages, neurological disorders, reproductive disasters, Central Nervous System disorders, and in the case of concomitant chemicals such as benzene, toluene, ethylbenzene and xylene (the BTEX chemical family), cancer. It is this kind of glaring loophole you can build a pipeline through that will continue to kill us and ravage the planet. This must end. Get strong. Say no to corporate interests. Stop the insanity of this industry controlling our lives and destroying the only place we all can survive. Go farther than these rules. Draw the bright shining line in the Earth. End this now. Completely and forever.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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