

Stephen Hoffman

#3256

From: ecomment@pa.gov
Sent: Tuesday, June 16, 2020 4:03 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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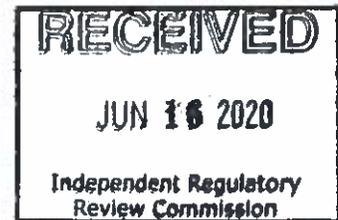


Re: eComment System

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)
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Comments entered:

The Oil and Gas industries are one of the largest producers of VOC's in the United States. Indeed, the entire industry is responsible for 20% of all man-made VOC emissions and 40% of VOC's released by stationary sources (from::Congressional Research Science Report. Methane and Other Air Pollution Issues in Natural Gas Systems, January, 2020).

How could it not? Pollution of this nature can stem from The Industry in the forms of leaking, venting, production process combustion, auxiliary productions and constructions such as pipelines and roads, well drilling, and use of transmission equipment. Although past conventional methods of drilling for oil and gas polluted less in its exploration and production, this all changed when unconventional methods such as hydrofracturing, shale gas production and coalbed methane production swamped the industry. Hence, the older argument that the newer industry of Natural gas, especially as a cleaner fuel and a bridge to an even better energy world, is not credible. Pollution, especially of VOC's and methane, has been ramped up to the detriment of public health along with the health of the Planet.

My understanding is that there are three categories of Emissions: Fugitive,(both Intentional and Unintentional); Combustive; and Associated. This industry's emissions fall into all three categories, four....if you count the subdivision of Fugitive Emissions. In addition, almost all

aspects of this industry emit dangerous chemicals, particulates, vapors and/or matter. VOC's, which combine with NO2 and sunlight to produce ground level ozone, is "joined" by the release of high amounts of H2S emissions, formaldehyde and Hazardous Air Particles, along with horror family known as the BTEX Chemicals (toluene, ethylbenzene, benzene and xylene) And again, this is in ALL phases of this industry, from the beginning with exploration, all the way to either the storage or use of the end product.

It is our belief at BEA that these regulations do not go far enough to begin to rein in the many transgressions this industry is known for. The exceptions to what rules you are attempting to address are too numerous and far reaching to consider this attempt to be totally credible. We do not believe that this set of rules will be useful in the real world of numerous operators, absentee owners, past attitudes of contempt for both communities and people directly affected and indeed, contempt for the law itself. In addition, the reduced budget of the PA DEP that has been going on for years now, effectively removes enforcing or even monitoring. And finally, penalties in the past have been laughable, being rightly considered by the industry as the Cost of Doing Business. We must do better. You must do better. There is little time to create the kind of change that this nation and our own State, desperately needs in the face of an already unfolding climate disaster.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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