

# 3256

**Stephen Hoffman**

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**From:** ecomment@pa.gov  
**Sent:** Wednesday, July 15, 2020 3:00 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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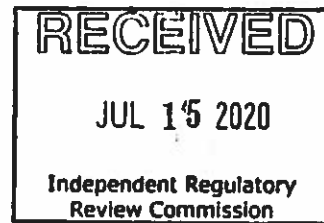


**Re: eComment System**

**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:**

Joe McCay  
(jaddmac@comcast.net)  
823 Longvue Dr  
Houston, PA 15342 US



**Comments entered:**

I would like to thank PA DEP For the opportunity to comment on the proposed regulation for the control of VOC emissions from existing oil and natural gas sources. I believe I bring a balanced perspective to the many comments that have been submitted as an employee in the natural gas industry and a lifelong resident of Southwestern Pennsylvania.

It should be noted that the natural gas industry is highly regulated both in Pennsylvania and on a the national level. There is very little disagreement that Pennsylvania has some of the most strict emission requirements in the nation. Examples of these are the implementation of PA DEP's General Permit 5 and conditional Exemption 38 in 2013, increased requirements in 2015 and 2018 revisions. A General Permit 5A was also added for well pads in 2015. These requirements are in addition to the federal New Source Performance Standards for Oil and Gas (NSPS OOOO and OOOOa).

The industry takes is obligation to protect air quality and the surrounding communities seriously. This includes meeting regulatory requirements but also voluntary programs for methane emission reductions such as One Future and The Environmental Partnership. Many of the companies operating in Pennsylvania actively participate in these programs. In addition, many companies have implemented their own in-house methane reduction programs.

There are other significant air quality benefits due to natural gas which should be recognized. These include:

- Since 1990, natural gas production has increased by 50%, yet total methane emissions have decreased by over 40%
- The increased use of natural gas in power generation has provided significant benefits. Since 2005, including 1) Volatile organic compounds from electric generation have decreased by 33%, 2) Sulfur dioxide and nitrogen oxide emissions have decreased by 93% and 80%, respectively.

These significant air quality benefits have saved countless lives, and significantly reduced respiratory-induced hospitalizations while providing billions of dollars in public health benefits to the citizens of Pennsylvania.

As the submitted comments are reviewed, I ask that the final regulation be:

- Based upon current facts and updated information,
- Recognize and encourage significant technological advances of the industry,
- Cost effective, and,
- Provide a reasonable compliance schedule for implementation of requirements at affected facilities.

The Marcellus Shale Coalition is preparing detailed comments on behalf of its member companies and should be given serious consideration

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Jessica Shirley  
Director, Office of Policy  
PA Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Office: 717-783-8727  
Fax: 717-783-8926  
ecomment@pa.gov