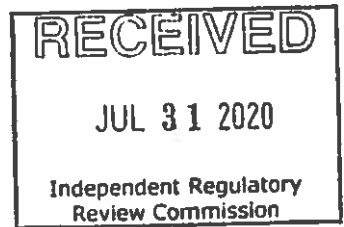


3254

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, July 24, 2020 11:06 AM
To: Environment-Committee@pasenate.com; IRRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

CAUTION: ****EXTERNAL SENDER**** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 2 - Proposed #7-544
Testimony date: 6/24/2020 12:00:00 AM
Testimony location: WebEx

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:

Charles Wunschuh
Breathe Easy Susquehanna County (chuckwunschuh@hotmail.com)
2128 SR 3021
Springville, PA 18844 US

Comments entered:

Oral comments given at 24 June 2020 hearing. See emailed written comments below:

My name is Chuck Wunschuh, I live in Dimock Township ,Susquehanna County Pennsylvania, which currently is the #2 ranked county in the commonwealth for natural gas production, and #6 in the country, home to over 50 natural gas compressors, many drilled wells, mega well pads with 5 mile laterals, CNG processing plants, gas power plants and active extraction,processing and transport of shale gas. PA currently is the #2 largest natural gas producing state in the nation. I thank PA DEP on behalf of Breathe Easy Susquehanna County, BESC, for this opportunity to offer our support and gratitude to the state for its plans to regulate and effectively reduce emissions of methane and volatile organic chemicals from existing natural gas infrastructure. We live with this infrastructure close to our homes as our rural county has no

zoning or setbacks to protect our health from such emissions. In 2013, BESC's founding mission statement was "To protect air quality and health of communities across Pennsylvania's Marcellus Shale region from potentially harmful air emissions released through the processes of shale gas extraction, production and transport." We have long advocated for industry, to voluntarily use best technologies and processes, going beyond state regulations to achieve the lowest emissions, to preserve our air quality to help protect the health of everyone living and working in our community. We thank PA DEP for acknowledging the health risks to those of us living near this infrastructure from VOC emissions several of which are benzene and formaldehyde, and others that are precursors to ozone. Natural gas compressors emit Nitrogen Oxides and Volatile Organic Chemicals, which in the presence of sunlight form ozone, risk not only the health of our community but regional communities downwind of our county as ground level ozone can travel 200 miles. EPA approved emissions free dehydrator technology is available to eliminate 93% of VOC emissions from well pads and compressors and has been in use and is an easy cost effective retrofit.

We thank the state for acknowledging the role of methane emissions in our global climate crisis, and for stepping up to effectively reduce methane emissions from natural gas infrastructure in the commonwealth. We ask that the loophole to exempt low producing wells from leak inspections be closed, as our shalefield/frontline communities would suffer cumulative impacts from this exemption as all wells will eventually be low producing. These low producing wells already are responsible for more than half of methane pollution in the state. We ask the provision to allow operators to reduce frequency of inspections be removed if previous inspections revealed little leakage, as uncontrolled leakages are random and are only detected with frequent regular inspections. We ask the proposed regulations include control requirements for all emissions sources that are covered in DEP's already adopted General Permits for new oil and gas sources: the GP-5 and GP-5A.

We thank PA DEP for installing their continuous transparent realtime PM2.5 monitoring Air Quality Station in New Milford Township, Susquehanna County PA. BESC kindly asks the commonwealth to provide continuous realtime transparent Ozone monitor from this same air quality station as our county undoubtedly has experienced a sharp rise in ozone levels due to the cumulative VOC and nitrogen oxide emissions from at least all the compressors, and this will help protect our community directly in addition to downwind communities. Thank you.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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