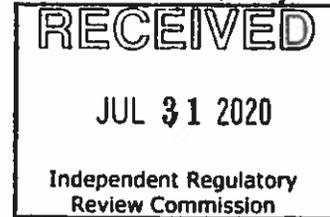


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Oral Testimony presented to the PA Environmental Quality Board

By: Barbara Litt, Co-chair, Green Sanctuary Team, First Unitarian Church of Pittsburgh
Re: PA DEP's proposed regulations for Control of VOC Emissions from Existing Oil and Natural Gas Sources (PA Bulletin vol. 50 no. 21; May 23, 2020; pp. 2633-2664)
Date: June 24, 2020

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Representing the organization, "Green Sanctuary Team" of First Unitarian Church of Pittsburgh (NOT First Unitarian Church of Pittsburgh as a whole)

Thank you for the opportunity to testify. My name is Barbara Litt, and I reside in Pittsburgh, PA. I speak today as an individual and as co-chair of the Green Sanctuary Team at First Unitarian Church of Pittsburgh. This testimony represents my personal views, is endorsed by the Green Sanctuary Team, and is co-signed by 15 church members and friends. It is not the views of the church itself.

Two important principles of my Unitarian Universalist faith are to affirm and promote "the inherent worth and dignity of every person" and "respect for the interdependent web of all existence." One way I put my faith into action is to advocate, and take personal action to promote environmental justice, for both present citizens of the Commonwealth of PA and the world, and for future generations. The proposed regulations for Control of VOC Emissions from Existing Oil and Natural Gas Sources are a significant step for environmental justice in several ways, as I will explain briefly below. However, the proposed regulations leave open two loopholes that prevent them from being as protective as they could and should be, evoking a saying by Michelangelo, about the danger of setting one's aims too low:

"The greatest danger is not that our aim is too high and we miss the goal, but that is it too low and we achieve it." In this case, aiming too low imperils the future of our climate and all Earth's creatures.

According to the US EPA, environmental justice "will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work."

These proposed regulations work to advance environmental justice in at least three ways. First, on a local level, by limiting emissions of harmful VOCs, people and

animals living or working near oil and natural gas infrastructure can be less afflicted by serious health effects, ranging from headaches and nausea, to central nervous system and liver damage, to birth defects, to cancer.

Second, on a regional level, preventing emission of VOCs, which are a precursor of ground level ozone, will reduce harmful ground level ozone concentrations. As stated in the PA Bulletin, "these reductions would benefit the health and welfare of the approximately 12.8 million residents and the numerous animals, crops, vegetation and natural areas of this Commonwealth." These reductions are especially important to the many people who suffer from asthma, COPD, and now Covid-19, who are disproportionately black and brown people.

Finally, the proposed regulations have the co-benefit of controlling leaks of the potent greenhouse gas (GHG), methane. The main component of natural gas, methane is responsible for 25% of the climate change we're already experiencing worldwide. Over a 20-year timeline, methane is 86 times more potent than carbon dioxide at trapping heat in the atmosphere, and it is responsible for much of the climate change we are already experiencing in Pennsylvania. Impacts of this climate change already being felt here include, for example, warming, floods, droughts, and the polar vortex, causing decreased crop yields, a rise in vector-borne diseases like Lyme disease and West Nile Virus, and worsening air quality due to higher temperatures.

Pennsylvania's leaders must take action to reduce the impacts of climate change by reducing emissions of GHGs. Governor Wolf set a goal to cut PA GHG emissions by 80% by the year 2050 (from their 2005 levels). This is a significant target, even though it is missing the urgency of what the scientific consensus tells us we need to do in order to avoid the worst effects of climate change. That is to act more quickly, to cut emissions in half by 2030. Strengthening the proposed regulations will be necessary in order to attain either Governor Wolf's target or the more urgent one.

Pennsylvania's oil and gas industry vents and leaks 1.1 million tons per year (TPY) of methane, over 15 times more than what industry self-reports to the state, according to [a 2020 analysis by the Environmental Defense Fund](#). (I note that conventional oil and gas wells are not currently required to report methane emissions to the state, and it is estimated that they emit about half of this 1.1 million TPY.) The proposed rule estimates that approximately 75,000 TPY methane will be cut due to the rule. While the proposed reductions are an important start, as proposed, the regulation leaves over half of all potential cuts to methane emissions from the industry unchecked, due to two concessions to the short-term interests of the industry, at the expense of the future climate and all Earth's creatures.

I urge the Department to make the following improvements to the proposed rule:

- Eliminate the provision in the proposed rulemaking that exempts low-producing wells from the rule's leak inspection requirements. Low-producing

wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania and all wells, regardless of production, require routine inspections.

- Eliminate the provision that allows operators to reduce the frequency of inspections if previous inspections reveal that only a small percentage of components is leaking. Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections. They cannot be predicted based on the absence of leaks in the past.
- Ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources.

I believe that we all have an ethical duty to do what we can to address the existential threat posed by climate change. We all have a societal obligation to cut greenhouse gas emissions deeply and rapidly. I often hear people say, "why should I do anything to prevent climate change? Even if I do, other people (or other countries) will keep polluting." Perceptions matter because they drive opinions and actions. To address climate change, we in PA must do our part and not give others reasons to be apathetic.

As the second-largest natural gas producing and the third-largest GHG emitting state in the nation, Pennsylvania must do its part to in both reducing harmful air pollution from existing sources and reducing its disproportionate contribution to the climate crisis. In the face of rollbacks of oil and gas methane rules by the Trump administration, Governor Wolf taking action to adopt the strongest possible methane rule in Pennsylvania is more important than ever. Therefore, I strongly support strengthening the proposed regulations.

Co-signers

Margaret Schmidt, Co-chair, Co-chair, Green Sanctuary Team, First Unitarian Church of Pittsburgh

Michael Safran

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