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Independent Regulatory
Review Commission

Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

Good afternoon. I am Dr. Rebecca Hays, an Associate Professor of Biology at a Philadelphia area university. My background is in ecology and oceanography. I grew up and currently reside in Aldan in Delaware County, PA. I am also a Christian who believes strongly that it is our responsibility as humans to care for the earth that we have been entrusted with, not only because it is good to do so, but because taking care of the environment also allows us to care for our neighbors. In my classes, I teach about the importance of environmental justice issues, in particular how pollution tends to harm poorer communities and black, indigenous, and people of color the most. I also remind students that it is our moral responsibility to ensure that all people have access to clean air, water, and land. These should be basic human rights, however, that is not true in our world today.

Pollution is not avoidable, but we must reduce what we can of it. As I tell my students, it is much easier to prevent pollution than it is to clean it up. Once air pollution leaves its source, it becomes not only difficult to track or clean, but prohibitively expensive to control. This proposed rulemaking to adopt reasonably available control technology (RACT) to limit VOC emissions is a good step forward for Pennsylvania to better protect its residents, particularly children and those with pre-existing respiratory conditions, and to protect our environment.

Others are speaking about the health impacts of VOCs and I am not a health expert. As someone with asthma though, I need to advocate for air that is easier to breathe and less polluted. However, I must speak from my area of expertise and that is climate change.

I have studied climate change for more than 20 years and done research in climate reconstruction work. It is both my professional and personal opinion that climate change is the biggest threat to our environment and to human life today. Climate change will not only result in warmer temperatures, but it will radically shift global weather patterns, contribute to sea level rise, and cause droughts, floods, famine, and more violent storms. It will also assist in the spread of tropical diseases, such as malaria, as temperatures warm around the globe. Climate change is also expected to result in the extinction of up to 50% of species worldwide by 2100.

For humans, the consequences will also include the large-scale displacement of people from their homelands, particularly for those in the South Pacific who live on islands not much above sea level. This displacement is happening to our neighbors though too, as the islands in the Chesapeake Bay have been slowly disappearing into the Bay and will continue to as the sea level keeps rising.

But how might this relate to Methane in Pennsylvania you ask? It is simple – our air pollution does not stay in Pennsylvania, but spreads out through the atmosphere. Our pollution not only directly impacts us, but also impacts our neighbors in Maryland and around the world.

However, more locally, our climate in Pennsylvania has warmed by 1.8°F over the last 100 years. We are seeing increases in flooding and pest species and our agriculture industry is being affected. We are already suffering the impacts of climate change and it will only get worse.

To mitigate the worst-case scenarios of climate change, we must take action now. While many think of Carbon Dioxide as the main culprit of climate change, Methane is estimated to have 25 times the global warming potential of Carbon Dioxide. Adopting RACT to limit VOC emissions now will allow Pennsylvania to benefit from better air quality, to protect the health of its citizens, and to help mitigate the impacts of climate change.

I ask you to support and strengthen the DEP's proposed standard for the Control of VOC Emissions from Oil and Natural Gas Sources by including requirements for low-producing well and to continue frequent, regular inspections even at locations without a history of significant leaks, as those are our best guard against future uncontrolled leaks. This proposed rulemaking not only is good for protecting human and environmental health today, but it is vital to protecting our future. Thank you.

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