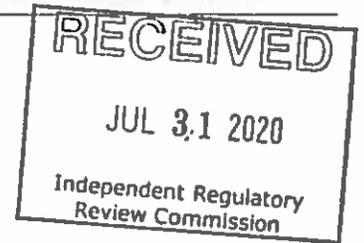


3256

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 3 - Proposed #7-544
Testimony date: 6/25/2020 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:

Robert Little
(rlittle@verizon.net)
4621 Tarryton Rd
Harrisburg, PA 17109 US

Comments entered:

Oral comments given at 25 June 2020 hearing. See emailed written comments below:

As a practicing Family Physician in Pennsylvania since 1972, I have witnessed many cases of Chronic lung disease and asthma plus many cases of cardiovascular disease. There are many studies that show that higher levels of VOC's and ozone contribute to increased incidence of these diseases. I support the lowest feasible limits on VOC's and ozone, and I certainly do not want to withdraw from the 2016 EPA standards.

The proposed control measures for VOC emissions, if implemented, will simultaneously control methane emissions and provide VOC emission reductions of approximately 4,404 TPY and methane emission reductions of approximately 75,603 TPY.

A study in 2018 by the Environmental Defense Fund and a team of university scientists

estimates that the U.S. oil and gas industry emits 13 million metric tons of methane into the atmosphere each year, losing \$2 billion annually from over 400 leak-prone drilling and processing facilities. The losses, according to the study published in the journal Science, are 60 percent more than those estimated by EPA. I am glad that the proposal includes more frequent inspections of wells and pumping stations.

Pennsylvania is the third leading emitter of greenhouse gases among the United States. Greenhouse gases (VOC's, CO₂, NO₂ and others) are what is causing climate change worldwide and causing irreversible damage to the planet. The combination of VOCs and nitrogen dioxide, both products related to the burning of fossil fuels, when combined in the presence of sunlight causes ozone production.

Ozone levels are directly related to VOC emissions A study of emergency department visits among children ages 0 to 4 in Atlanta found that each 30 parts per billion (ppb) increase in the three-day average of ozone was associated with an 8 percent higher risk of pneumonia and a 4 percent higher risk for upper respiratory infection. A separate, nationwide study of childhood asthma costs associated with environmental factors estimated those costs at \$2.2 M in 2008.

In my testimony last year at the Capitol I stated the following: "I understand that current law allows ozone emissions at 70 ppb over an 8 hour average. In order to protect sensitive populations, such as children and patients with respiratory diseases governments must adopt a health protective ozone eight hour standard of no higher than 60 parts per billion.

Pennsylvania standards for VOC's and ozone emissions should be as low as feasible.

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