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**Kathy Cooper**

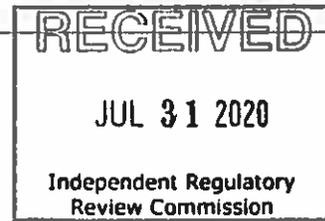
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**From:** ecomment@pa.gov  
**Sent:** Sunday, July 26, 2020 1:07 PM  
**To:** Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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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:

Robin Schaufler  
(robin@likethebird.com)  
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Swarthmore, PA 19081 US

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Comments entered:

This is in addition to my earlier comment submitted today.

The rule proposal seems to only monitor emissions at their source, without consideration of their aggregate.

The state needs to set a cap on total methane emissions. If monitoring occurs at all the possible sources, then the number of possible sources needs to be limited to the cap divided by the emissions detected at their sources.

It sounds like pervasive monitoring is not possible. If that is true, then satellite technology needs to be developed and deployed to detect total emissions, which would then be applied to the cap. The difference between total emissions and the sum of emissions detected at source should guide the addition of more monitoring as well as reduction in number of sources.

To reduce the number of sources, new permits should be withheld and existing ones withdrawn.

The cap should have a schedule for decrease. In contrast to the IPCC report, the only target

year for zero emissions that does not result in permanent, irreversible harm is 2030. Achievement of a decreasing cap can be done through a combination of leak plugs and infrastructure retirement. The state should invest in energy storage for capacity planning for the sake of both clean air and jobs, since clean energy can supply more jobs than the declining fossil fuel industry ever will.

In addition to methane, it is imperative that an ever declining cap on VOCs be instituted. As an asthma sufferer, my chest is probably a better monitoring instrument of air quality and ground level ozone than any of the DEP instruments. While VOCs and their byproduct ozone are hazardous to the health of all Pennsylvanians, they are especially concentrated in marginalized communities of color. Ending this environmental injustice would mark progress in alleviating the justified civil unrest afflicting our entire country.

Thank you for the opportunity to comment, and to add multiple comments on this important policy decision.

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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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