

**Kathy Cooper**

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**From:** ecomment@pa.gov  
**Sent:** Friday, August 7, 2020 12:49 PM  
**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)

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**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

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:

Elissa Weiss  
(elissamweiss@gmail.com)  
134 Dennis Drive  
Glenshaw, PA 15116 US

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Comments entered:

No text comments were provided as part of this comment submittal. Please refer to attachments below.

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These links provide access to the attachments provided as part of this comment.

Comments Attachment: [Weiss Testimony for Control of VOC Emissions from Oil and Natural Gas Sources \(1\).pdf](#)

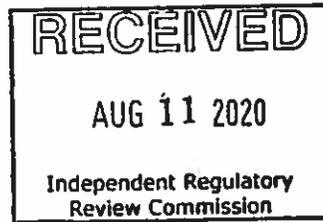
Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Jessica Shirley  
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PA Department of Environmental Protection  
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3256



Elissa Weiss, M.D.  
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Glenshaw, PA 15116  
[elissamweiss@gmail.com](mailto:elissamweiss@gmail.com)  
June 25, 2020

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

My name is Elissa Weiss. I live in Indiana Township, Allegheny County, and I am an internal medicine physician.

We are here to address the Control of Methane and VOC Emissions from Oil and Natural Gas operations. To that end we must recall Article 1, Section 27 of the Pennsylvania Constitution that states: "... the people have a right to clean air ...". And, I was recently reminded of the oath of office that (all government agencies and) officials of the state take "... to support, obey, and defend ... the Constitution of this Commonwealth and ... discharge the duties of my office with fidelity." It seems to be clear in this context that it is essential that the DEP finalizes the most protective methane and VOC rule that cuts air pollution from existing oil and gas operations in order to safeguard the health of our citizens and minimize our contribution to climate change.

Some recent headlines have grabbed my attention:

- Hottest Arctic Temperature Record ... with 100\* Reading in Siberia
- Oil Spill in Siberia: Are We Prepared for Permafrost Thaw?
- Air Pollution Increasing the Risk of COVID-19 Deaths, According to New Studies
- Childhood Cancer Stalks Southwest PA
- Nearly Half of US Breathing Unhealthy Air.

We have heard several times (in the course of the verbal testimonies) how the highly potent greenhouse gas, methane, contributes significantly to climate change; that it is more than 80 times more potent than CO<sub>2</sub> in the first twenty years after its release, and that it is responsible for 25% of man-made global warming.

We also know that Volatile Organic Compounds (VOCs) accompany the methane through every stage of the oil and gas extraction, compression, processing, transport, handling, and storage process. And, we know that VOCs are harmful to human health directly, or by combining with heat, sunlight, and particulate matter to generate ground-level ozone and smog.

Additionally, radioactive substances such as radon, the major cause of lung cancer in nonsmokers, may accompany the extracted methane (and, correspondingly, the VOCs).

Climate change effects on human health are numerous, widely studied and documented, and broadly include cardiovascular, respiratory, cerebrovascular, kidney, infectious, allergic,

nutritional, reproductive, and psychological decompensation, increased hospitalizations, and death.

VOCs and air contaminants related to oil and gas extraction contribute to a similar breadth of adverse health effects which include hematologic and non-hematologic cancers, endocrine disruption, developmental disorders, birth defects, preterm birth and low birth weight, high-risk pregnancies, and neurological disorders.

These pollutants can travel and affect populations hundreds of miles downwind. Infants and children, the elderly, the poor, minority communities, pregnant women and fetuses, industry and outdoor workers, and first responders are especially vulnerable.

Choose from any of the litany of the aforementioned health effects, and patients, nurses, physicians, health care providers, and family members can attest to the physical and emotional pain of individuals who suffer with them, suffering which is often coupled with financial strain and insolvency. These avoidable tragedies can be heart-breaking.

Because our families need the most comprehensive protections from these harms, we urge DEP to make the following improvements to the protective methane and VOC rule:

1. Include inspections and repairs of low-producing oil and natural gas wells, which are responsible for more than half of methane pollution from the oil and gas industry in Pennsylvania.
2. Eliminate the draft rule portion that allows oil and gas operators to reduce inspection frequency if previous inspections do not reveal significant methane leaks.

--- Research shows that large, uncontrolled leaks are random and unpredictable, and only frequent, regular inspections ensure their detection at any well.

The Environmental Defense Fund 2020 analysis, significantly based on data obtained from ground level measurements, concludes that oil and gas related methane emissions in Pennsylvania are more than 16 times higher than industry-reported data which was derived using outdated methodology. This marked underestimation of emissions mirrors findings from studies surveying emissions in Houston, Texas in 2018, as well as emissions from more than 8000 well pads spanning all shale gas basins in 2014. The findings indicate that in addition to predictable extra emissions, which are estimated to generate large health damage costs, unpredictable emissions are mostly random and cause total emissions to greatly exceed estimates.

Strengthening the protective rules to cut methane, VOC, and, indeed, all air pollution from existing oil and gas operations, including particularly the frequent, regular inspection and repairs-as-indicated of low-producing and all, both conventional and unconventional, oil and natural gas wells is an imperative described in the Pennsylvania Constitution and a responsibility DEP bears toward every Pennsylvania citizen, family, and community.

Thank you for your attention, and thank you for your devotion to this critical issue.

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Pennsylvania Data Project 2.0, Hillary Hull, Environmental Defense Fund, 2020

Aerial Surveys of Elevated Hydrocarbon Emissions From Oil and Gas Production Sites,  
Lyon et.al., Environ. Sci. & Technol.: 05 April 2016

Understanding Excess Emissions from Industrial Facilities: Evidence from Texas,  
Zirogiannis, Hollingsworth, Konisky, Environ. Sci. & Technol., 2018