

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Wednesday, June 17, 2020 10:07 AM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov
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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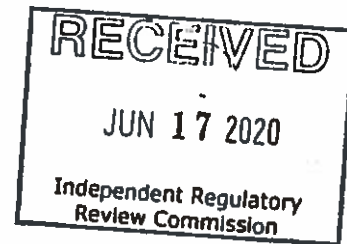


Re: eComment System

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:

Sharon Furlong
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Comments entered:

Environmental Injustice is not just a phrase from left leaning organizations. It is a fact , a profound fact that adds the world of environmental damage to the already-burdened world of poor people, and people/communities of color. It is a known fact that filthy industries, landfills, large manufacturing projects often have sited themselves in communities with reduced political power and little money to fight these developments. In addition, these communities are often urban in location, adding the factors of congestion, old infrastructure, lack of natural buffers or natural mitigating factors into this sad and destructive equation. It is a known fact that rates of asthma and other upper respiratory problems exist in higher numbers and percentages in these very same communities. The mortality rate is higher, the death in childbirth rate is higher, how long a person lives in these zip codes substantially lower, and the access to medical services or even information is also woefully lacking.

And then along comes the natural gas industry with its Construction of roads, pipelines outbuildings, auxiliary buildings and supporting structures. Fracking may not be happening in the middle of Philadelphia , but just about everything else does.

And with this industry comes air pollution. The rules you have advanced here do not take into consideration that recent research has indicated the level of "safe" exposure has been

significantly reduced from the standards by which these rules seem to have been based upon. In addition, there is nothing here that indicates awareness or concern for the aggregation of VOC's (Known to create or worsen asthma and other lung functioning conditions) and its concomitant witches brew of toxic chemicals, HAP's, formaldehyde, or H2S. Even so called "safe" levels of exposure may not be accurate when aggregation of these materials exist, as they invariably do in areas of congestion or overdevelopment of industry supporting structures in one area. Hence, what constitutes a "safe" level of exposure in poor urban areas where larger numbers of people live and work and go to school and shop and cannot get away from the constant presence of poison? Indeed, the EPA prior to 2018 theorized in one of their reports that millions of urban dwellers have a ten percent higher chance of developing cancer due to constant exposure to these very same chemicals, fumes, vapors, and particulate matter, than the rest of the United States. 10%. And this was the Federal government, and this was not that long ago. (AirQuality Impacts of Oil and Gas; American Geosciences Institute; 6/1/18)

You owe it to the people of Pennsylvania who are not in a position to be protecting themselves from the insidious and deadly impacts of the byproducts coming from all aspects of the oil and gas industries. This is your mandate. This is your job. If science says that we cannot remove all the VOC's from the entire industry and how it does it's job...and we cannot as the technology is NOT there, nor is the will, nor is the monitoring of corporations to insure even compliance with what laws exist, then you must put a stop to all of this. But first, you must put a stop to the thinking in your agency that you can do this and still fulfill your mandate of protecting us, the hapless and out of control citizens of the State, from the ravages of being poisoned . You cannot do this. You cannot pass rules and regulations that ignore this science of public safety and the exposure of people of poverty and color and still be relevant or considered legitimate. And you cannot promise compliance with even these deficient rules with the reduced even skeletonized staff you have and the relationships you have with these industries. We have watched the "Government-to-Industry" pipeline work for many years now and we are not amused. Indeed, many of us consider this a deep conflict of interest, call integrity of the department into question and believe our Life's are being sold for a bigger paycheck.

In this nation that is finally acknowledging that Black Lives Matter, you must step up to this awakening yourselves by embracing the truth of the phrase "environmental injustice" and act upon it in the same fashion as we are asking the police to do.....to reorganize around what has been ignored in the past in the already awful world of environmental degradation and the wholesale contamination of our State. Change needs to happen NOW.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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