

Stephen Hoffman

#3256

**From:** ecomment@pa.gov  
**Sent:** Tuesday, June 23, 2020 6:26 PM  
**To:** Environment-Committee@pasenate.com; IRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov  
**Cc:** c-jflanagan@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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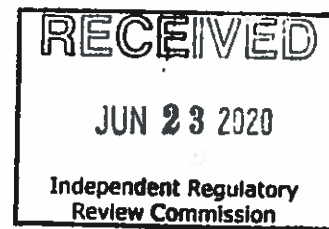


**Re: eComment System**

**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:**

Barbara Brandom  
private citizen (bwb131252@gmail.com)  
1118 King Ave  
Pittsburgh, PA 15206 US



**Comments entered:**

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

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

Comments Attachment: [June 21, 2 PM Wed June24 Pennsylvania Environ Quality Board.docx](#)

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Comments from Barbara W. Brandom, MD

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On Control of VOC Emissions from Oil and Natural Gas Sources, 50 Pa.B.2633

Submitted June 23, 2020

I am commenting on the proposed rulemaking of the Pennsylvania Environmental Quality Board, "Control of VOC Emissions from Oil and Natural Gas Sources", 50 Pa.B.2633. This rulemaking would have Pennsylvania adopt reasonably available control technology (RACT) requirements and emission limitations for existing oil and natural gas sources of volatile organic compound (VOC) emissions. The Pennsylvania Department of Environmental Protection (PADEP) moved forward with this rule in part because its adoption will help Pennsylvania achieve and maintain the eight-hour ozone National Ambient Air Quality Standards (NAAQS). Ground level ozone is created by the reaction of oxides of nitrogen with VOCs in the presence of sunlight. PADEP estimates that the proposed control measures would reduce VOC emissions by more than 4,000 tons per year and provide consistency among all sources of oil and gas for monitoring fugitive emissions. These requirements are consistent with the leak detection and repair (LDAR) inspection requirements specified in PADEP's General Plan Approval and with Governor Wolf's strategy to reduce methane pollution by the oil and gas industries in Pennsylvania because both VOCs and methane are released together at oil and gas operations.

As a physician with training in public health I recognize the adverse effects of ozone on respiratory and cardiovascular function. The volatile organic compounds are not only precursors of ozone, but in themselves have adverse effects on many human organ systems as well as carcinogenic potential, and methane has large adverse effects on human health because it is driving the climate crisis. Ozone is a constant threat in many areas of the USA. June 20<sup>th</sup> there was an ozone alert in New Orleans and parts of Louisiana.

In December 2018, the Department (PADEP), "recommended not reducing the LDAR inspection frequency for well sites and compressor stations, not allowing a step-down provision for LDAR inspection frequency at well sites as it is not appropriate to reduce semi-annual inspection frequency, requiring that the LDAR inspection frequency be based on the economic feasibility and not on the production of a well. . ." Since 2013 the PADEP has had a LDAR inspection requirements which are quarterly and monthly audio, visual and olfactory inspections.

I strongly support the 2013 position of the PADEP with very frequent routine inspection for leaks of VOCs at all oil and gas operations, not just those with greater rates of production, because relatively small operations have been responsible for half of the total magnitude of air pollution by VOCs and methane. Furthermore, there should be no gift of increasing the interval at which inspections are performed, if no leaks had been found for some period of time. Large leaks have occurred randomly. There is no clear effect of time on the likelihood that a leak will occur. Therefore, continuing inspection at regular intervals is the method most likely to detect leaks. 50Pa.B.2633 must be strengthened in these areas.