

3256

Stephen Hoffman

From: ecomment@pa.gov
Sent: Friday, July 10, 2020 5:48 PM
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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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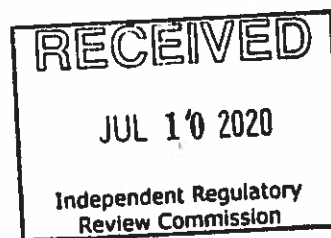


Re: eComment System

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:

Corinne Mayland
private citizen (corinnem@protonmail.com)
705 Whites Road
Lansdale, PA 19446 US



Comments entered:

My name is Corinne Mayland, and I live in Lansdale, Montgomery County, Pennsylvania. I provided testimony at the June 25, 2020 hearing, and am adding these additional comments because I remain concerned about both VOC and methane emissions. Those emissions are bad for the environment, which makes them bad for citizens. Sounds academic, but it's not – it's personal. Everything I need to survive...food, air, water, shelter...all comes from the environment. To top it off, I also have asthma, so I don't need a public service announcement to tell me it's a bad air quality day, because that is when I need to use a rescue inhaler. And when do those bad air quality days happen? On hot summer days when ground level ozone is higher. VOCs contribute to higher levels of ground level ozone. So I assure you, anyone near VOC emitting oil and gas infrastructure is exposed to negative effects on their lungs.

While VOCs have a direct impact on me, it is indeed the methane emissions that I find more concerning. Methane has a much greater negative impact on climate change, and unrestrained, could negate numerous other efforts to combat climate change. Please see my oral testimony for more.

As stated before, I ask that the DEP pass the regulation with modifications to make it more stringent:

- Do not exempt low production sites from fugitive emissions inspections (AVO and LDAR).
- Eliminate the option for operators to reduce the frequency of LDAR.
- Make all storage vessels an affected source, such as by eliminating the differentiation distinctions made for conventional vs. unconventional and for construction year.
- Knowing that many smaller operators may decide to decommission their wells, add concomitant rules about decommissioning wells in a manner that protects the environment, with potential incentives for compliance.

There have been several rounds of public input, and I was further concerned by some of the DEP's comments. In the "Comment and Response Document Round 1 (6/9/18)", DEP repeatedly responded that their proposal was to also "allow for the development of the natural gas industry in a safe and effective manner." It reads as if the DEP is encouraging the natural gas industry, which if a correct interpretation, is offensive. I remind this body that "The Department of Environmental Protection's mission is to protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment." (<https://www.dep.pa.gov/About/Pages/default.aspx>). Please listen to residents. We need this regulation, with the more comprehensive application I note above, so we can do more for the health and safety of our citizens.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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