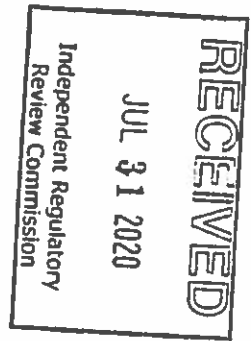


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"Testimony for Control of VOC Emissions from Oil and Natural Gas Sources"
Submitted by: David DeMaria
167 South Founders Court, Warrington, PA 18976
demaridg@comcast.net



This is David DeMaria from Warrington, PA. Thank you for giving me the opportunity to provide comment on the proposed changes to chapters 121 and 129 of the Pennsylvania environmental code. The impact of these VOC emissions on the health and welfare of Pennsylvania citizens is well documented as is the science behind climate change and the role these types of emissions play in the continued and unprecedented warming of our planet. Just this week record temperatures in excess of 100 degrees have been observed in Siberia, above the Arctic Circle. As far away as this is, the interconnectivity of emissions and conditions is hard to deny – what we do here in PA impacts what happens elsewhere, and what happens elsewhere impacts the conditions here in PA. While these rules are focused on VOC's, they inherently act to reduce methane emissions, which are a huge contributor to climate change.

The proposed changes to the current rules are a very positive step forward in an effort to implement control measures to reduce VOC emissions in our Commonwealth, and support Governor Wolf's strategy to reduce emissions of methane from the oil and natural gas industry. I complement the Board on these steps, including identifying two specific cases where more stringent reasonably available control technology (RACT) requirements are necessary. It's especially noteworthy that you are doing this at a time when the EPA, under its current fossil fuel backed leadership that has done everything in its power to deny climate change and science, has taken steps to weaken federal guidelines already in place by proposing a complete withdrawal from 2016 Control Techniques Guidelines (CTG) so as to give free reign to let oil and gas companies vent "as they see fit" and ignore fugitive emissions.

Just a quick note on my own background; I'm a Chemical Engineer with almost 40 years of experience working in the industrial gas, chemical and environmental and energy sectors, including natural gas supply systems and CO2 capture systems, with a particular focus on process control, including environmental compliance, safety, and operations. So my observations come from that perspective along with a recognition of the huge environmental challenges we face as a society. I support the proposed changes to the existing rules and can even support two of the EPA's proposed loosening of restrictions that the EQB is also recommending following. Specifically treating brownfield sites the same as green-field and the proposal to allow in-house engineers to certify a determination of technical infeasibility rather

than require an engineer with a professional license to do so. I would trust experience over that piece of paper any day.

The economic benefits of these proposed changes are well thought out and documented both quantitatively and qualitatively in the proposal. From my own experience I can tell you that the benefits on the industrial side are very real, in terms of both reductions in lost product and the income that will be generated for small businesses like emission abatement and environmental monitoring companies. But as you've noted, these pale in comparison to the benefits that will be achieved in terms of health care costs, agriculture, forestry, water quality and marine life and other such beneficiaries.

PA is the 2nd largest producer of natural gas in the United States with one and a half million people living within just ½ mile of an oil or gas facility. And we know from reputable studies that the estimated amount of methane and VOC emissions dwarf the amount of emissions currently reported to the DEP. This situation bodes particularly poorly for the most vulnerable members of our communities. People with chronic conditions such as asthma, infants and children, the elderly, the poor who are predominantly people of color; and all this at a time when respiratory stress is at an all-time high due to COVID-19. So doing everything reasonable in our power to reduce these emissions, isn't just the smart economic thing to do, it's the right moral thing to do. These revisions to the rules will help significantly in this regard, but loopholes need to also be closed that will allow emissions to continue to go uncontrolled and unreported for smaller wells and other producers where the individual contributions may be small, but the cumulative ones are enormous. I would also strongly suggest removing the allowance to reduce inspection frequency based on previous inspections not showing any significant leaks. Speaking from experience, just because a process or its safeguard is working correctly today, that is no guarantee that it will perform in the same way tomorrow. Thank you for your time today.