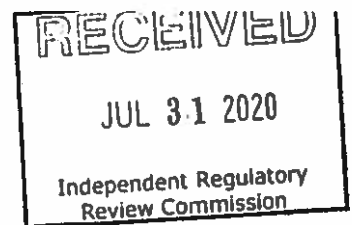


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DEP COMMENT: JUNE 24, 2020: VOC'S

My name is Sharon Furlong and I am Spokesperson for Bucks Environmental Action.

I have to ask: what makes you think you will be able to lessen the overall emissions from two industries where killer emissions are a part and parcel of the entire process, from inception to end product, and everything in between? Your agency has been skeletonized through underfunding by the State Legislature for double digit years, leaving your agency woefully unable to do what you are mandated to do. VOC's are not the only problem. The toxic and cancer-causing BTEX family of chemicals, formaldehyde, Nitrous Oxides, H₂S, Methane, and last but not least, Hazardous Air Pollutants are all part of these industries in ALL of their manifestations.

There are three categories of Emissions: Fugitive which is further subdivided into the two categories of Intentional and Unintentional; Combustive and Associated. All aspects of these two industries fall into all categories. One cannot name a single process that is devoid of even one of these horror chemicals, vapors or particulate matter. Indeed, according to the Congressional Research Science Report of January, 2020, the Oil and Gas industries are one of the largest producers of VOC's in the United States and is responsible for 20% of ALL man-made VOC emissions and 40% of VOC's released by stationary sources. Pollution has risen exponentially with the advent of unconventional methods such as fracking, shale oil production and coalbed methane production. Indeed, your own agency has cited these industries over 16,000 times in recent years, including for the blatant disregard of permit limitations, illegal venting of gases, unreported leaks and spills, and illegal dumping of hazardous materials, along with other egregious flouting of what few laws and limitations exist. Indeed, the gas industry in Pennsylvania has been such a bad corporate citizen that our Attorney General announced charges against two major players the State. THIS is the corporate history that must be taken into consideration against what theoretically looks like rules and regulations designed to reign in dangerous emissions. THIS corporate history of contempt for the law, its enforcers and all of the rest of us in Pennsylvania is what needs to take a seat at the decision table, for once. And your history of granting permits no matter what must end.

Allow me to now point THIS out:

There are exceptions to these rules occurring in Sections 129.121 through and including 129.127. There are 12 exceptions. There was a dearth of reasoning given as to why these exceptions were being written into this already flawed set of rules. For several exceptions, what the exceptions actually were were missing. One exception did say something on the order of "compliance when financially feasible." Since when is "financially feasible" a reason for protection of public health, or an excuse for not protecting public health? And then to write in that compliance to these flawed rules and exceptions, was to be established and monitored by the owner's own records, completely devoid of independent analysis! So..... exceptions granted without even defining what they are or why they are there, and compliance based on the owner/operator. Does the old metaphor of the "Fox Guarding the Henhouse" comes to anyone's else's mind other than my own??

And finally, finally.... the following must be said in regards to this entire idea that VOC's and their merry band of toxins are both capable of being controlled and will be controlled by these industries because we asked them to:

Environmental Injustice is not just a phrase from left leaning organizations. It is a fact, a profound fact that the world of environmental damage gets slammed more frequently to already-burdened poor people and people and communities of color. With the Oil and Gas Industries come air pollution, and air pollution of the VOC, ozone and methane kind. The rules you advance here do not take into consideration that recent research indicates the level of so-called "safe" exposure must be significantly reduced when exposure is in dense and congested urban areas. Recent research also indicates that previously established benchmarks of safety must be recalculated in areas where accumulations will occur due to not only congestion, but where overdevelopment of heavily polluting projects occur in a contiguous area, and where there are already existing high levels of illness and respiratory distress syndromes such as asthma. ALL of these conditions are the reality in poor, urban communities and communities of color. Indeed, the EPA prior to 2018 when it lost its mind, theorized in one of their reports that millions of urban dwellers have a 10% higher chance of developing cancer due to constant exposure to the very same witches'

brew of chemicals, gases and particulate matter YOU tell us you can control.

You owe it to the people of Pennsylvania to protect them, us, from being poisoned, especially the ones not in a position of protesting the damage being done to them in the name of progress.....and especially when we know it is in the name of profits. In order to protect everyone, you must stop thinking you can control these industries. You cannot, but you especially cannot with a set of rules such as these that don't go far enough, that are riddled with holes and exceptions and handouts, and aren't going to be monitored. Do your job. You are not supposed to be friends of these industries. You are not supposed to be in training for a position in their ranks. You are there to stop us from being poisoned and our world from being contaminated. You need to uphold our Constitutional Right to Clean Air, Water, and a Clean Environment and in order to do so stop putting forth third rate attempts at the impossible.....stop these industries from killing us. Period.