



**Remarks by Robert M. Routh
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Good afternoon. My name is Robert Routh, and I'm a staff attorney with Clean Air Council. We are a member-based environmental health organization that has fought for over 50 years to protect and defend everyone's right to breathe clean air. As the second-largest natural gas producing state in the country, Pennsylvania has a heightened responsibility to protect its residents from the health and climate impacts caused by its expanding oil and gas infrastructure. The industry's own self-reported data shows that methane emissions continue to rise, and top-down studies, which measure the actual methane content in the air, have continually found much more methane than self-reported data predicts.

Therefore, I want to commend DEP for releasing their revised general permit drafts to control methane pollution from new sources. DEP has made some changes, but they left the most protective standards in place: imposing requirements directly targeting methane, controlling emissions from pigging stations and liquids unloading operations, establishing a baseline quarterly leak detection and repair (LDAR) frequency, and requiring a 98% control efficiency from multiple sources.

However, we are concerned about a particular aspect of these revised permit drafts: the incorporation of federal requirements by reference. In the earlier permit drafts, DEP had written those federal requirements into the permits themselves. Given the Trump administration's active and ongoing efforts to delay compliance dates in the federal New Source Performance Standards (40 CFR Part 60, subpart OOOOa), incorporating these requirements by reference will cause significant uncertainty and unpredictability for industry operators and the general public. These federal delays could be finalized at any time, and there will be significant confusion about which requirements apply to which sources in Pennsylvania and when. Nonetheless, we look forward to DEP finalizing and publishing these permits in the PA Bulletin as soon as possible.

On existing sources, it is discouraging to see that DEP plans to merely implement EPA's 2016 recommendations, known as the Control Techniques Guidelines or CTGs. In terms of scope, the federal guidelines are limited because they control only volatile organic compounds (VOCs) and do not touch methane. Therefore, these rules will not apply to a substantial number of facilities. We should also note that, just last month, EPA submitted to OMB a draft notice that proposes to withdraw the CTGs in their entirety. We anticipate a public comment period on that proposal in the near future.

Let's be clear: Pennsylvania has considerable authority and flexibility under existing state and federal law to control methane from oil and gas sources. The requirements in these general permit drafts for new sources would be cost-effective and technologically feasible for existing facilities to comply with as well. Pennsylvania has a significant number of methane sources that either do not emit VOCs, or do not emit high enough levels of VOCs to reach the applicability

thresholds in the federal guidelines; sources like this will not be covered. EPA also chose to exclude important sources from the guidelines, such as liquids unloading, pigging operations, and intermittent-bleed pneumatic controllers. A Pennsylvania rule must apply to these sources to ensure broad-based methane reductions. The federal guidelines also do not, in any way, represent leading control requirements given what other states, including Colorado, Wyoming, and California have recently put forward.

In sum, comprehensive methane rules must be broader in scope and more stringent than the requirements found in the CTGs. Governor Wolf and DEP need to lead here and aim higher for the sake of all Pennsylvanians. Thank you.