

**Small Business Compliance Advisory Committee**  
to the Pennsylvania Department of Environmental Protection  
PO Box 8468  
Harrisburg, PA 17105-8468

April 17, 2019

Honorable Patrick McDonnell  
Secretary  
Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063

Re: Proposed Rulemaking for Control of VOC Emissions from Oil and Natural Gas Sources  
(25 *Pa. Code* Chapters 121 and 129)

Dear Secretary McDonnell:

On April 17, 2019, the Small Business Compliance Advisory Committee (Committee) discussed the proposed rulemaking draft Annex A to amend 25 *Pa. Code* Chapters 121 and 129 (relating to general provisions; and standards for sources) for control of volatile organic compound (VOC) emissions from oil and natural gas (O&G) sources. The proposed rulemaking would implement control measures and other requirements in §§ 129.121—129.130 (relating to control of VOC emissions from oil and natural gas sources) to reduce VOC emissions from O&G industry sources by the owner and the operator of a facility that is not regulated elsewhere in Chapter 127 (relating to construction, modification, reactivation and operation of sources) and Chapter 129. The proposed VOC emission control measures and other requirements in §§ 129.121—129.130 are generally consistent with the recommendations in the U.S. Environmental Protection Agency's 2016 O&G Control Techniques Guidelines and would reduce VOC emissions throughout this Commonwealth from those affected sources.

The proposed rulemaking Annex A includes VOC emissions control requirements and recordkeeping and reporting requirements applicable to the owners and operators of storage vessels, natural gas-driven pneumatic controllers, natural gas-driven diaphragm pumps, reciprocating compressors, centrifugal compressors, and fugitive emissions components. The proposed rulemaking Annex A includes amendments to definitions in § 121.1 (relating to definitions) to support the requirements of §§ 129.121—129.130.

The Committee voted 6-0-0 (yes-no-abstain) to concur with the Department's recommendation to present the proposed rulemaking amendments to the Environmental Quality Board for consideration for adoption and publication as a proposed rulemaking for public comment.

Sincerely,



Dale I. Kaplan  
Chair

cc: Krishnan Ramamurthy, Director, PA DEP BAQ  
Kirit Dalal, PA DEP BAQ  
Viren Trivedi, PA DEP BAQ  
Susan Hoyle, PA DEP BAQ  
Susan Foster, PA DEP BAQ  
Nancy Herb, PA DEP BAQ