April 11, 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 11, 2019, the Air Quality Technical 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 10-4-1 (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,

Patrick K. O’Neill Esq.
Chair

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