

## **Comments to the Citizens Advisory Council**

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April 19, 2016

My name is Eva Roben and I'm the Climate Change Outreach Coordinator at Clean Air Council. Clean Air Council is a member-supported nonprofit organization based in Philadelphia committed to defending everyone's right to breathe clean air. We have operated in Pennsylvania for almost 50 years.

I am here today to discuss the Department of Environmental Protection's proposed methane reduction strategy.

Methane, as I'm sure you know, is a powerful greenhouse gas, 84 times more potent than carbon dioxide over 20 years. Methane is responsible for a quarter of the climate warming we're already seeing today, and if methane pollution continues unchecked, methane emissions stand to increase 25% over the next decade.

Methane is the primary component of natural gas and leaks from every stage in the natural gas supply chain. As Secretary Quigley has noted, just a one percent leakage rate in Pennsylvania is the climate warming equivalent of the carbon emissions of five coal-fired power plants. In addition, wherever methane leaks it is accompanied by leaks of volatile organic compounds (VOCs), which include smog-forming compounds, carcinogens, and other air toxics. Any regulations that seek to reduce methane pollution will also decrease leaks of these pollutants that are hazardous to public health. DEP estimates that in 2013, 4,790 tons of VOCs were emitted from natural gas operations. Smog has been linked to long-term damage to the lungs, increased hospital admissions, heart failure, and premature mortality. Air toxics pose risks associated with short-term acute exposures like headaches, eye irritation, and coughing.

Pennsylvania is the nation's second largest producer of natural gas, second only to Texas. This past week, the Environmental Protection Agency released its annual greenhouse gas inventory, which showed that the oil and gas sector has now surpassed agriculture as the largest contributor to U.S. methane emissions.

These two pieces of information point to Pennsylvania's profound need to cut its methane emissions from the oil and gas industry, and the Council is grateful that DEP has begun work to address our state's methane pollution problem.

I am especially glad to see that DEP has proposed to replace the August 2013 Category Number 38 conditional permit exemption with a new General Permit, which will allow DEP to make sure that air pollution from well pads and associated operations are controlled and monitored. I am glad that DEP has proposed updating General Permit 5 to include transmission in addition to

compression and processing and updated best available technology requirements. Most importantly, I am glad to see DEP developing a regulation for existing sources. Although the EPA is working on a new source rule, in 2018 existing sources will still account for 90% of our oil and gas related methane pollution. It is critical that we adopt an existing source regulation as quickly as possible.

In the methane reduction strategy, DEP proposes adopting new standards for leak detection and repair (LDAR), pigging operations, and liquids unloading. If in the final version DEP adopts standards for pigging operations, liquids unloading, and requires monthly LDAR, Pennsylvania will truly be a national leader on methane regulations. Given our state's status as second largest natural gas producer, it is critical that we lead the nation by adopting the most stringent air pollution regulations for natural gas operations.

Finally, while EPA is working on finalizing a new source performance standard to reduce air pollution from the oil and gas sector and has announced its intention to develop an existing source rule, it is critical that Pennsylvania move forward as quickly as possible with its methane reduction strategy. Pennsylvania can move much more quickly than can EPA to protect its residents from the hazards of methane pollution from natural gas operations.