

## Philadelphians Support EPA's New Standards for Oil and Gas Pollution

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Philadelphia residents know that air pollution does not follow city and county boundaries and that much of the air pollution emitted from oil and gas operations across Pennsylvania ends up in the Philadelphia region, endangering the health of large portions of Pennsylvania residents, particularly people of color and lower-income residents. Philadelphia currently fails to attain federal standards for ground-level-ozone pollution which is created in the atmosphere when nitrogen oxides and volatile organic compounds (VOC) react in heat. The gas industry both contributes to significant VOC and ground-level-ozone pollution as well as increased heat due to emissions of the powerful greenhouse gas methane.

Thank you for proposing life-saving pollution control standards for new and existing oil and gas well sites, compressor stations, and processing plants. The proposed regulations contain requirements for “no-bleed” pneumatic controllers at all new and existing oil and gas well sites. This is a commonsense requirement that relies on readily available technology that will drastically reduce air pollution by limiting emissions of methane, VOCs and hazardous air pollutants (HAPs), like the known carcinogen benzene. I urge the EPA to maintain these requirements in the final rule and require “no-bleed” pneumatic pumps at all associated gas compressor stations.

The EPA must ban the practice of gas flaring at well sites. The EPA has proposed that all well sites with “reasonably available” sales gas pipelines should be required to reinsert all gathered methane gas emitted at a site into available pipelines. This is a good start, but we urge the EPA to ban flaring at all oil and gas facilities, except in emergencies when they would otherwise have to vent the gas directly to the atmosphere. EPA should require operators to collect all gas that might have otherwise been flared, regardless of the proximity to sales gas pipelines.

I am concerned about the proposal to only monitor air pollution at so-called “low-emitting wells” once a year. Special attention must be given to sites where air pollution is assumed to be low. Penn State University concluded that the EPA underestimates methane pollution from the gas industry by 48 to 76%. EPA should establish accurate, real-time air pollution monitoring systems at new and existing well sites. EPA must continue to conduct this air monitoring as wells age because EPA correctly states in the proposed rulemaking that the majority of avoidable air pollution at gas wells is caused by aging, unmaintained equipment.

EPA must require more aggressive rod sticking replacements as well as valve and gauge replacements triggered by accurate onsite air pollution monitoring. EPA currently seeks to exempt wells that emit less than 3 tons per year of methane from regular, ongoing air monitoring, but the agency concludes that most “low-emitting” wells release 2.2 tons of methane per year. The EPA must not exempt these wells from regular inspection requirements

considering that methane pollution incidents can occur any time at any type of well because of a variety of geological or equipment issues.

These concerns highlight the need for community-driven, local air monitoring. Gas drilling companies should be required to regularly report pollution levels, as well as equipment malfunctions, leaks, repairs and the quantity of collected gas that would have otherwise been emitted to the atmosphere. Residents impacted by the oil and gas industry deserve accurate, publicly available real-time air monitoring and to know what nearby industrial facilities are doing to protect public health.

Thank you for acknowledging that oil and gas pollution significantly damages air quality across Pennsylvania, including air quality in the Philadelphia area, and we urge you to do everything in your power to adopt the strongest regulations so that everyone's health can be better protected, regardless of their zip code.

First and Last Name	Organization	Your Role in the Organization	Neighborhood
Carolyn Moseley	Eastwick United	Executive Director	Eastwick
Tyrique Glasgow	Young Chances Foundation	Executive Director	South Philly
Chris Bordelon	Somerton Civic Association	Board Member	Somerton
Chuck Bode	Philadelphia Trolley Coalition	Executive Director	City of Philadelphia
Victoria Miles-Chambless	Empowered Community Development Corporation, Inc	Treasurer	Southwest Phila/ Kingsessing
Rashida Ng	University of Pennsylvania	Faculty	Germantown
Earl Wilson	Eastwick Friends and Neighbors Coalition	President	Eastwick

Maria Duca	Neighborhood Networks; Climate Action Network	member/activist	Chestnut Hill
Jason Sandman	Climate Dads	Co Founder	Bella Vista
Lynn Robinson	Neighbors Against the Gas Plants	Director	19140, SW 19144, SE 19129
Eugene Desyatnik	Bella Vista Neighbors Association	President	Bella Vista / South Philly
Craig Melidosian	Ward 40 Republican RCO	Advocates for community beneficial use of real estate and land planning in accordance with the changing needs of the community. <a href="https://www.dvrpc.org/Mapping/Maps/pdf/Philadelphia_Planning_Districts.pdf">https://www.dvrpc.org/Mapping/Maps/pdf/Philadelphia_Planning_Districts.pdf</a>	Lower Southwest Philadelphia Planning District and portions of the University Southwest Planning District.
jacqueline Williams	Legacy Bridges Stem Academy INC	Director of Stem	Southwest Philadelphia
salena coca	human rights coalition	organizer	west philly
Tanya Dapkey	500 Women Scientists Philly Pod	Co-Founder and Co-leaders	Philadelphia
Tonyehn Verkitus	Physicians for Social Responsibility Pennsylvania	Executive Director	Philadelphia

M. Shikomban North of  
Washington  
Avenue Coalition

President

South Philadelphia