



"THE BIRTHPLACE OF THE STATE OF NEW YORK"

OFFICE OF THE MAYOR

THOMAS M. ROACH
MAYOR July 30, 2018

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Hon Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, New York 12224

Dear Governor Cuomo:

This letter is in response to the NYS Department of Environmental Conservation (DEC) expression of interest in public stakeholder input in the drafting of 6 NYCRR Part 203, Oil and Gas Sector Emissions, new regulations to reduce criteria pollutants and methane emissions from the oil and gas sector, and other regulations as applicable.

The City of White Plains asks that you consider revisions of State oil and gas regulations. The NYS DEC together with the NYS Department of Health (DOH) should incorporate stricter regulations that could substantially reduce hazardous air emissions.

Protecting public health, reducing harm caused by gas infrastructure, and tackling climate change requires strong, comprehensive and immediate action.


Recommendations for Regulations:

In the interest of protecting public health, safety and the environment for all New Yorkers, we urge the DEC to adopt the following regulatory requirements:

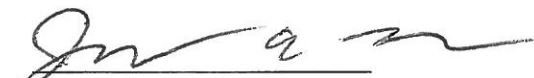
- 1) Installation and use of Lowest Achievable Emissions Rate (LAER) technology at all new and existing gas infrastructure facilities that emit pollutants into the environment, including those not designated under federal Title V requirements or not located within non-attainment areas;
- 2) Inclusion of non-combustion emission sources and emission sources currently considered "exempt" within the DEC regulatory framework.
- 3) Installation and use of specific emission control technology, identified through the federal National Gas Star Program and elsewhere;

- 4) Implementation of practices, identified through the National Gas Star program and elsewhere to reduce natural gas leakage and blowdowns, including but not limited to maintaining compression at pipeline pressure, redirecting blowdown gas to lower-pressure lines, cap testing, use of inert gases at pigging stations, and more aggressive maintenance of packing rings and compressor rods than required by existing regulations;
- 5) Onsite verification of compliance with regulatory requirements and permit conditions by independent registered inspectors through scheduled and random visits;
- 6) Rigorous quarterly inspection by independent registered personnel with regular reports submitted to the DEC and made available to the public to detect and ensure timely eliminations of natural gas leaks at gas infrastructure facilities using the comprehensive detection methods such as aerial and ground-level laser methane assessment, organic vapor analyzers (OVAs), toxic vapor analyzers (TVA), sorbent tubes, SUMMA canisters, infrared cameras, as well as real-time monitoring with Fourier Transform Infrared (FTIR) spectroscopy and other remote sensing along pipelines;
- 7) 48-hour or greater advanced notification of all planned blowdowns, regardless of size, and other chemical releases; notification within 30 minutes of all unplanned blowdowns, regardless of size, and other chemical releases at all gas infrastructure facilities; and suspension of planned blowdowns or other chemical releases when weather conditions would increase exposure to air pollutants;
- 8) Timely replacement or retrofit of technology and update of site practices for existing gas infrastructure facilities to ensure compliance with current regulatory requirements and best management practices;
- 9) Chain of custody records and tracking for all industrial waste removed from gas infrastructure facilities;
- 10) Strict enforcement of all best management practices and protocols for gas infrastructure facilities to ensure protection of public healthy, safety, and the environment.

Sincerely,



Thomas M. Roach
Mayor



Hon. Justin Brasch
White Plains Councilman

Page - 3-
July 30, 2018

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