



July 23, 2021

Via E-mail to air.regs@dec.ny.gov

Ms. Ona Papageorgiou, P.E.

New York State Department of Environmental Conservation (DEC)

625 Broadway, 11th Floor

Albany, NY 12233-3251

Re: Proposed Rulemaking for Oil and Gas Sector Emissions, 6 NYCRR Part 203

Dear Ms. Papageorgiou:

We, the undersigned Legislators of Westchester County, appreciate the opportunity to comment on the Proposed Part 203 Oil and Natural Gas Sector Regulations, which aim to reduce harmful air pollutants and methane emissions that exacerbate the climate crisis and threaten public health.

These regulations are of vital importance to our constituents. Westchester residents live in close proximity to two Title V compressor stations (Southeast and Stony Point), which are major sources of hazardous air pollutants releasing millions of pounds of greenhouse gases and toxic pollutants annually. Westchester is also home to metering and regulating stations, pigging stations and massive gas transmission pipelines and associated infrastructure, all of which emit chemical compounds and are prone to leaks, blowdowns and subject to fires and explosions.

This body previously sent letters to the DEC on July 24, 2018 and January 31, 2019 in support of amendments to strengthen the proposed regulations. We are pleased that DEC has made notable improvements since the 2018 Stakeholder Outline, in particular:

- Directly addressing methane, a potent greenhouse gas, which is worse for the climate than carbon dioxide in the short-term;
- Coverage for gas distribution and storage systems;
- Better pollution control technologies (vapor control and seals) on tanks and compressor stations;
- Requiring some gas capture at compressor stations;
- Requiring the use of optical gas imaging (OGI) for leak detection; and
- Prohibiting the venting of tanks starting in 2023.

In order to realize New York's emission reduction targets and climate goals, it is imperative for the DEC to develop the most rigorous regulations possible. Effective pollution control regulations are the first step in helping to protect our health and slow the acceleration of our climate crisis.

Extreme weather events including heat waves, bad air quality days, flooding, and droughts across the nation and in New York should be major wake-up calls for the need to swiftly implement stronger rules to dramatically reduce greenhouse gas emissions and volatile organic compounds (VOCs) from our fossil fuel infrastructure.

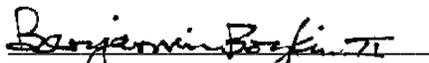
Impacts from the climate crisis and nonattainment of air quality standards continue to come at a serious cost to New Yorkers. Children, pregnant women, the elderly and individuals with respiratory and cardiovascular disease are especially vulnerable. Communities of color are disproportionately affected.

The proposed regulations are a good start, but we urge the Department to go further and strengthen the proposed rules to more effectively control and limit oil and gas pollution and greenhouse gas emissions. We support technical comments submitted by the Clean Air Council and recommend DEC to require additional safeguards, including, but not limited to the following:

- *Impose stricter timeframes and deadlines for leak detection and necessary repairs.*
- *Require operators to adopt best available technologies to eliminate, capture or reduce emissions, to the greatest extent possible.*
- *Lower the threshold for blowdown notification and reporting.*
- *Expand communication to ensure that impacted residents and community members receive timely notification of planned and unplanned blowdown events.*
- *Ensure compliance by establishing robust inspection and/or auditing processes.*
- *Increase accountability by making records and air emissions data collected from operators publicly available (via a database or website).*
- *Require continuous emissions monitoring systems, especially for sources that meet certain criteria such as major sources, facilities in areas that exceed federal air pollution standards, environmental justice areas and facilities with a history of harmful pollution or violations.*

We believe that these recommendations (as more fully set forth in comments submitted by the Clean Air Council) are technologically feasible, cost effective and critically important.

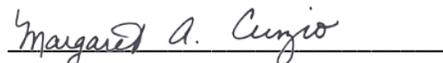
Sincerely,



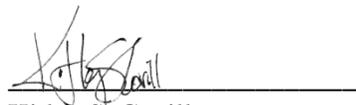
Chairman Benjamin Boykin II
Legislator, 5th District



Majority Leader MaryJane Shimsky
Legislator, 12th District



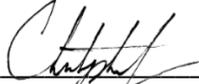
Minority Leader Margaret A. Cunzio
Legislator, 3rd District



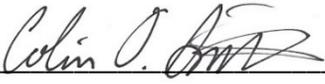
Kitley S. Covill
Legislator, 2nd District



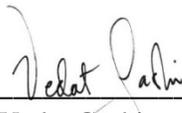
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Legislator, 8th District



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Vedat Gashi
Legislator, 4th District



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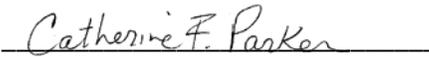
Terry Clements
Legislator, 11th District



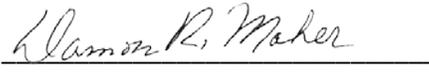
David Tubiolo
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