American Lung Association • American Public Health Association
Allergy & Asthma Network • Alliance of Nurses for Healthy Environments
Asthma and Allergy Foundation of America • Children's Environmental Health Network
Health Care Without Harm • National Association of City and County Health Officials
National Environmental Health Association • Physicians for Social Responsibility
PSE Healthy Energy • Trust for America's Health

August 2, 2016

The Honorable Gina McCarthy
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Attention Docket ID No. EPA-HQ-OAR-2016-0204

Dear Administrator McCarthy:

Air pollution emissions, including methane, volatile organic compounds and air toxics, threaten public health. The undersigned health, medical and nursing groups support strong regulation of emissions from all oil and gas operations to reduce that burden on our communities and our patients. We urge the U.S. Environmental Protection Agency (EPA) to move forward with standards to limit these emissions from all existing sources. We write to request EPA to move expeditiously to implement the Information Collection Request (ICR) and gather all the data as quickly as possible.

It is essential that EPA adopt and maintain the strongest possible measures to reduce methane and other greenhouse gases that endanger the long-term health of all people. The changing climate threatens the health of Americans alive now and in future generations. In addition, these emissions harm human health directly and as precursors to ozone and particulate matter. All of these concerns support the need for EPA to collect all the necessary data and to take swift action to ensure that the existing sources reduce these emissions.

In December 2015, many of our groups submitted extensive comments to you on the health threats from methane, volatile organic compounds and air toxics emissions and their role in climate change as part of the comments for the New Source Performance Standards. We have summarized those health concerns below.

Methane worsens climate change, which poses serious threats to human health

To help reduce climate change, the nation must reduce methane emissions, which have the second most powerful global warming potential according to the International Panel on Climate Change (IPCC, 2013).

Warmer temperatures increase the likelihood that ground-level ozone will form and will make it harder to clean up. Ozone causes asthma attacks and respiratory distress, and may increase cardiovascular harm, risk of harm to the central nervous system, risk of low birth weight in newborns, as well as premature death.

Wildfires and drought conditions give rise to smoke and dust storms spreading miles from their source, producing high levels of particulate matter. Even short-term exposure to such levels of

particulate matter threatens human health, including premature death and cardiovascular and respiratory harm, and increased severity of asthma attacks in children.

Heat waves, flooding, dangerous hurricanes and other extreme weather events increase the risks to health. Hotter temperatures can increase the risk of heat stroke and heat exhaustion and can increase the risk of hospitalization for cardiovascular and respiratory diseases. Flooding and wind events cause premature deaths, often through drowning, but the aftermath of the damage expands the burden. Water damage leaves behind lingering risks including dampness and mold, chemicals and sewage spread through in flooded homes, schools, hospitals and other community facilities. These extreme weather events also disrupt communities that suffer them, including hospitals, clinics, medical care and public health services.

Oil and gas emissions pose direct risks to human health

Clear evidence documents harm directly from emissions of volatile organic compounds (VOCs), but also from ozone and fine particulate matter ($PM_{2.5}$) formed from the VOCs that are precursors to ozone and fine particulates. These pollutants can cause or increase risk of cardiovascular, respiratory, and other acute and chronic systemic damage, and some increase risk of cancer. The standards will help reduce ozone and fine particulate matter levels in areas where oil and gas production occurs and downwind. The air toxics standards for oil and natural gas wells will also reduce hazardous air pollutants, including the risk of benzene and formaldehyde, both carcinogens, in the oil and gas production process and for transmission and storage.

Existing oil and gas production has led to astonishing and unhealthy concentrations of ozone. Recent studies in Utah and in Colorado show that oil and gas extraction is a significant source of precursor VOC emissions for the ozone in areas monitored at levels that fail to meet the 2015 ozone standard. As a VOC, methane is also a precursor to ozone, particularly in remote areas.

EPA needs extensive information to fully assess and reduce emissions

In the final ICR, we urge EPA to capture information from production through distribution of all oil and gas pollution sources and make all of the data collected available to the public as provided under section 114 of the Clean Air Act.

EPA should seek information about the following specific sources of methane and VOCs from all oil and natural gas companies:

From all equipment and production operations, including but not limited to:

- **Pneumatic controllers and pumps** of all types, including intermittent-bleed controllers, “low-bleed” pneumatic controllers, and gas-assisted glycol dehydrator pumps;
- **Tanks of all types**, including tanks at all sites that store oil, condensate, or produced water, as well as tanks that have lower expected emissions;
- **Reciprocating and centrifugal compressors** at all sites, including those at well pads;
- **Offshore oil and gas production platforms;**
- **Open impoundments** for handling produced water, and disposal facilities for produced water utilizing evaporation and/or percolation;
- **Liquids unloading operations** from both vertical and horizontal wells; and
- **Acid gas removal units and dehydrators** throughout the sector.

From all events and processes recognized as sources of undercounted emissions, including but not limited to:

- **Leaks from all aboveground facilities**, including "city gates" and other facilities in the distribution segment of the natural gas industry;
- **Blowdown events** from wells or other equipment;
- **Venting and flaring** of associated gas from oil wells, and flares at other types of facilities; and
- **Compressor engine exhaust**, where methane is likely present from incomplete combustion of fuel gas.

EPA must act quickly to secure this information to protect health

To protect our children, our communities and the public, the United States must significantly reduce greenhouse gases. Reducing methane is an essential step to reduce the burden of climate change. Fortunately, the benefits go far outside the impact on the climate, particularly in the reduction of other toxic and carcinogenic emissions with the same effort. Lifesaving benefits to public health can begin immediately.

The cleanup of air pollution from all existing oil and natural gas operations is necessary to protect public health. We urge EPA to ensure that all aspects of the oil and gas industry are included in this ICR and to move quickly to complete the data collection so that standards to protect the public health from existing oil and gas operations can be promptly promulgated.

We appreciate EPA's efforts to address air pollution from the oil and gas sector and the opportunity to provide comments.

Sincerely,

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Reference

Intergovernmental Panel on Climate Change (IPCC). 2013: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp. Accessed: http://www.ipcc.ch/report/ar5/wg1/