

November 25, 2019

The Honorable Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
William J. Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Sent via Regulations.gov  
Re: Docket ID: EPA-HQ-OAR-2017-0757

Dear Administrator Wheeler:

We, the undersigned physicians, nurses, and health professionals, strongly oppose the U.S. Environmental Protection Agency's (EPA's) proposed amendments to the 2012 and 2016 New Source Performance Standards for the Oil and Natural Gas Industry. This proposal is a dangerous rollback of standards that limit harmful pollution.

The current standards reduce industrial methane and volatile organic compounds (VOCs) from new oil and gas sources. This not only helps mitigate climate change and its associated health risks by curtailing emissions of methane – an especially potent greenhouse gas – from new and modified sources, but also limits emissions of toxic and carcinogenic air pollutants, benefiting public health in communities across the country.

Climate change poses immediate and growing threats to human health. Warming temperatures can lead to more ozone pollution, wildfire smoke, extreme heat, severe storms and flooding, longer allergy seasons, spread of infectious disease, and more.<sup>i</sup> Leading national health, nursing and medical organizations have called climate change a health emergency.<sup>ii</sup> Reducing emissions of methane from the oil and gas industry is critical to protecting health from the impacts of climate change.

Methane standards also reduce emissions of VOCs, which include gases recognized as hazardous air pollutants such as benzene, toluene, carbonyl sulfide, ethylbenzene, mixed xylenes, and n-hexane.<sup>iii</sup> Benzene and formaldehyde, another hazardous pollutant from oil and gas emissions, are recognized as known human carcinogens, while ethylbenzene is considered a probable carcinogen.<sup>iv</sup> VOCs also react with other emissions in the presence of sunlight to form ozone, which causes asthma attacks, increases hospital admissions and may cause premature deaths.<sup>v</sup>

A growing body of peer-reviewed science indicates that oil and gas development is associated with adverse health impacts, including premature birth, congenital heart defects, neural tube defects, and low birth weight for infants born to mothers living near natural gas development.<sup>vi</sup> People most at risk of harm from breathing these air pollutants from the oil and natural gas industry include infants, children and teenagers; older adults; pregnant women; people with asthma and other lung diseases; people with cardiovascular

disease; diabetics; people with low incomes; and healthy adults who work or exercise outdoors. Many live and work in communities near these oil and gas facilities, which are often located near lower income or minority communities.

EPA's proposal would roll back methane pollution standards for new oil and gas industry sources. It would also prevent the agency from setting future standards to clean up methane pollution from existing industry sources – a critical step to protecting health from climate change. On behalf of our patients and the communities we serve, we urge EPA not to finalize this proposal into law, and to instead fully implement and enforce the existing standards.

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<sup>i</sup> U.S. Global Change Research Program (USGCRP). 2018. Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II. USGCRP, Washington, DC. Doi:10.7930/NCA4.2018.

<sup>ii</sup> U.S. Call to Action on Climate, Health, and Equity: A Policy Action Agenda, 2019. <http://climatehealthaction.org>

<sup>iii</sup> U.S. Environmental Protection Agency (EPA). 2015. Regulatory Impact Analysis of the Proposed Emissions Standards for New and Modified Sources in the Oil and Natural Gas Sector. EPA452/R-15-002. Available: [http://www3.epa.gov/airquality/oilandgas/pdfs/og\\_prop\\_ria\\_081815.pdf](http://www3.epa.gov/airquality/oilandgas/pdfs/og_prop_ria_081815.pdf).

<sup>iv</sup> U.S. Department of Health and Human Services (HHS). National Toxicology Program. 2011. Report on Carcinogens, Twelfth Edition. Research Triangle Park, NC: U.S. Department of Health and Human Services.

<sup>v</sup> U.S. Environmental Protection Agency (EPA). 2013. Integrated Science Assessment for Ozone and Related Photochemical Oxidants. EPA 600/R-10/076F. Available:

<http://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=247492#Download>.

<sup>vi</sup> Casey J.A., D.A. Savitz, S.G. Rasmussen, E.L. Ogburn, J. Pollak, D.G. Mercer, et al. 2015. Unconventional Natural Gas Development and Birth Outcomes in Pennsylvania, USA: *Epidemiology* 1; doi:10.1097/EDE.0000000000000387.

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doi:10.1371/journal.pone.0126425

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