

Comments of Liz Scott – As Prepared for Delivery  
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To

Environmental Protection Agency Public Hearing for the Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems  
August 21, 2023

Good afternoon. My name is Liz Scott and I'm the National Director of Advocacy for Healthy Air at the American Lung Association. Thank you for the opportunity to provide comments today on the proposed greenhouse gas reporting rule.

The American Lung Association strongly supports accurate accounting of emissions. Under subpart W of the Greenhouse Gas Reporting Program, owners and operators of certain oil and gas facilities are required to report annual methane emissions using various methods. Unfortunately, the methods used have been shown to underestimate the total emissions. Getting this part right is crucial to achieving the emissions reductions needed to stave off even more catastrophic impacts of climate change, and, at the same time, to clear the air of the co-pollutants often leaking alongside methane.

Climate change is a health emergency, and we cannot afford to pass off the health impacts of climate change as future problems, because there is no shortage of climate disasters like flooding, wildfires, excessive heat and storms threatening lives and livelihood right now. These extreme weather patterns are being fueled by climate change which is being fueled in part by methane emissions. This is why the Lung Association was glad to see the inclusion of the Methane Emissions Reduction Program in the Inflation Reduction Act. Revising the requirements under subpart W to ensure that the reporting accurately reflects the total methane emissions from facilities is necessary to set up further tactics and strategies to reduce those methane emissions.

We support the proposed requirement to better report large intermittent emissions events. These events are currently not reflected in subpart W reporting and expanding the requirement for their inclusion will help capture some potentially large emissions events that are being missed otherwise. We also strongly support the proposed changes to deal with malfunctions. When equipment malfunctions occur, it is likely that emissions levels will be higher and requiring operators to report those higher emissions will lead to more accurate emissions data gathering.

Current methods are underestimating the levels of methane pollution. We encourage EPA to integrate top-down, basin level measurement data to get a better picture of total regional level emissions. This will help ensure that communities located closest to facilities are not suffering from escaped emissions, since we know that methane is not the only thing that leaks from oil and gas facilities. Volatile organic compounds, like benzene, are emitted alongside methane and can worsen asthma symptoms and increase the risk of cancer, developmental and neurological disorders. VOCs can also react to form harmful ozone pollution, or smog. Smog can increase the risk of premature death, contribute to asthma attacks and aggravate existing lung and heart problems.

We also support more accurate accounting for intermittent events. These events can account for a significant share of overall emissions but may be missed by one-time measurements. We urge EPA to

ensure robust methods and analysis are used to better account for these intermittent emissions events more broadly. Additionally, one of the provisions of the Methane Emissions Reduction Program was to allow owners and operators to submit emissions data. We strongly urge EPA to define clear guardrails and require independent verification of self-reported measurements.

Thank you for the opportunity to provide comments and for moving forward on a key pillar of the Inflation Reduction Act. We look forward to continuing engagement with the Agency as it implements this and further pieces of the Methane Emissions Reduction Program.