

Comments of Laura Kate Bender – As Prepared for Delivery
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On

The U.S. Environmental Protection Agency's Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Docket ID No. EPA-HQ-OAR-2021-0317 FRL-8510-02-OAR
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Hello, my name is Laura Kate Bender. I am the national assistant vice president for healthy air at the American Lung Association. I appreciate the opportunity to share these comments.

As you have heard from my colleague, the American Lung Association urges EPA to strengthen these proposed rules to best protect public health from harmful air pollution, particularly in communities that bear disproportionate burdens from climate change and from oil and gas extraction.

Climate change is a health emergency. Addressing it is a health opportunity. By tackling the problem of methane emissions from the oil and gas industry, we have the opportunity to provide immediate and lasting health benefits by cleaning up other dangerous air pollutants at the same time. Stemming methane pollution and volatile organic compounds from oil and gas operations is critical for lung health.

VOCs include gases recognized as hazardous air pollutants, including benzene and formaldehyde. Some are carcinogens. Others cause developmental and reproductive harm. The science shows that living near oil and gas development is associated with premature birth, congenital heart defects, neural tube defects, and low birth weight. VOCs also react with other emissions sources to form ozone and its many harms to health.

The broader health and medical community agrees that the need for stronger standards is urgent. In July, 29 public health, medical, health care and nursing organizations sent a letter urging EPA to adopt more stringent measures to reduce emissions from new and existing oil and gas operations. When the previous administration sought to weaken methane limits, we submitted comments opposing the rollback from hundreds of health professionals from 49 states. And I know the health community is well represented across the hearings this week as well.

At the Lung Association, we hear frequently from physicians who are seeing the impacts of a changing climate on their patients' health. Lately, that's often from people whose lives have been upended by wildfire smoke. Anyone's health can suffer on days with high levels of particulate matter in the air, but for people with lung disease, the risk is higher. Friends and family in my hometown have seen their lives radically altered by increasing catastrophic wildfires in recent years. One friend has perfected her ability to pack her necessities and evacuate her home at a moment's notice. My mom loves to garden, but can't be outdoors at all if there's even a small amount of smoke in the air because of how much it exacerbates her asthma.

As you know, the Lung Association will submit written comments on this proposal, so I want to use my remaining time today to shine a spotlight on the health imperative of ensuring cleanup at

small oil and gas operations. We know that methane leaks into the atmosphere during every phase of the gas supply chain: at drilling sites, during processing and in transport. When it comes to small oil and gas operations, the problem is magnified. A recent report from the Clean Air Task Force and Ceres found that many smaller companies emit disproportionate amounts of methane. As the New York Times described it in their article about the analysis: “Five of the industry’s top ten emitters of methane... are little-known oil and gas producers, some backed by obscure investment firms, whose environmental footprints are wildly large relative to their production.”

EPA’s job is to protect public health from dangerous air pollution. A person’s lungs don’t care whether the VOCs they’re breathing come from a small oil and gas producer or a large one. The climate doesn’t care whether methane is emitted from a small producer or a large one. The impact is the same, and EPA must ensure that it finalizes into law strong standards with no loopholes that allow emitters to avoid cleanup.

Overall, the Lung Association applauds the critical step that EPA has taken of strengthening emissions standards for future oil and gas sources and – most importantly, setting the first-ever federal standards for existing sources. Now we urge you to strengthen the proposal and ensure it covers all sources, sets strong and frequent leak detection and repair requirements for small and large sources, and ends the dangerous practices of venting and flaring. Communities across the country are counting on it. Thank you.