

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Opposition to notice of Proposed Withdrawal of the Final Control Techniques Guidelines for the Oil and Natural Gas Industry, RIN 2060-AT76

April 23, 2018

Dear Administrator Pruitt,

On behalf of our tens of millions of members and supporters, the undersigned 56 groups write to oppose your proposal to revoke the oil and gas air pollution standards known as Control Techniques Guidelines (“Guidelines”).

These oil and gas air pollution standards help states, tribes, and local governments identify commonsense and affordable ways to reduce smog-forming volatile organic compounds (“VOC”) from the oil and gas sector, which is the leading source of VOC pollution. And because these Guidelines only apply in areas that are suffering from increased levels of smog pollution, they help the American communities that most need relief from this pollution.

While air quality as a whole has been improving across much of the United States over the past few decades, many areas that are ground zero for the nation’s expanding oil and gas industry have seen a concerning increase in dangerous pollution. These communities need more protection, not less.

The Guidelines protect over 25 million Americans living in states without comprehensive safeguards to reduce this pollution, including Pennsylvania, Ohio, and Texas. Other states, such as Colorado, have established successful standards to address emissions from the oil and gas industry using the Guidelines as a model.

States, tribes and local governments need these oil and gas cleanup tools to help address ozone pollution that threatens public health. If oil and gas pollution is not addressed, the cleanup burden will fall on other sources or communities will continue to be exposed to dangerous air pollution. In far too many communities, oil and gas activities are a major driver of nonattainment. The proposal to withdraw the Guidelines runs directly counter to the Environmental Protection Agency’s (“EPA”) core mission to protect public health. Withdrawing the Guidelines will lead to increases in asthma attacks, lung disease, hospital visits, and missed school and work days. Children, who are especially susceptible to adverse health impacts from inhaling smog pollution, will suffer the most.

Your proposal to withdraw the Guidelines is especially troubling given EPA’s other regulatory rollbacks that threaten the health of vulnerable populations. These include a proposal to suspend EPA’s New Source Performance Standards for the oil and gas industry, which your own agency said “may have a disproportionate effect on children,” as well as efforts to gut or weaken pollution protections from power plants, cars, and trucks.

In addition, the Guidelines empower states and allow them to implement pollution-control measures tailored to their unique circumstances. You often speak about the need to give states flexibility in complying with environmental regulations. These Guidelines do just that. They are

a cost-effective blueprint for states and other localities to improve the health of their residents. States may choose to adopt the measures recommended in the Guidelines, or they may choose to adopt an alternate approach.

On behalf of the millions of Americans whose health will be adversely affected by this decision, we urge you to reconsider your proposal and keep these critical guidelines in place.

Sincerely,

Clean Air Task Force

Earthjustice

Earthworks

Environment America

Environmental Defense Fund

Alliance of Nurses for Healthy Environments

Breast Cancer Prevention Partners

Breathe California Golden Gate

Breathe Utah

California Voices for Progress

Citizens for Clean Air Grand Junction

Clean Air Council

Climate Law & Policy Project

Climate Resolve

Coalition for Clean Air

Conservation Colorado

Conservation Voters New Mexico

Defend Our Future

Earth Action

ecoAmerica

League of Conservation Voters

Moms Clean Air Force

National Wildlife Federation

Natural Resources Defense Council

Sierra Club

Environment Texas

Environmental Justice Center at Chestnut Hill United Church

Environmental Law & Policy Center

Fort Berthold POWER

Fossil Free California

Group Against Smog and Pollution

Health Action New Mexico

ICCR (Interfaith Center on Corporate Responsibility)

Interfaith Power and Light

Keystone Progress

LOGIC

Nature Abounds

Northern Plains Resource Council

Ohio Environmental Council

PennFuture

Physicians for Social Responsibility
Philadelphia

Pipeline Safety Coalition

Powder River Basin Resource Council

Presente.org

ProgressNow Colorado

ProgressNow New Mexico

ProgressOhio

Wyoming Outdoor Council

Project CoffeeHouse

Public Citizen

Responsible Drilling Alliance

San Juan Citizens Alliance

Western Colorado Congress

Western Environmental Law Center

Western Organization of Resource Councils

Western Resource Advocates