

April 23, 2018

The Honorable E. Scott Pruitt, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Comments submitted via Regulations.gov

Re: Proposed Withdrawal of the Control Techniques Guidelines for the Oil and Natural Gas Industry,
Docket ID: EPA-HQ-OAR-2015-0216-0327

Dear Administrator Pruitt:

As representatives of the medical and public health community, our organizations urge the U.S. Environmental Protection Agency not to finalize the proposed withdrawal of the Control Techniques Guidelines for the Oil and Gas Industry (CTGs). Revoking the CTGs amounts to a rollback of clean air safeguards that limit oil and gas pollution to protect public health.

Oil and gas operations are a source of volatile organic compounds (VOCs), which have a sweeping array of health impacts. They are a key component of ground-level ozone pollution. Evidence from studies around the nation shows that ozone worsens coughing and wheezing, causes asthma attacks and cardiovascular effects, may cause developmental and reproductive harm, may harm the central nervous system, and increases the risk of premature death.¹ Ozone also has been linked to reduced lung function in children. Ozone can threaten anyone's health, but certain groups are at greater risk, including children, adults over 65, people with asthma and other lung diseases, and people with cardiovascular disease.

A 2016 report by the Clean Air Task Force found that ozone pollution from the oil and gas industry could be associated with an additional 750,000 summertime childhood asthma attacks across the country every year.² The Lung Association's 2018 "State of the Air" report found that many cities in areas with high oil and gas operations rank among the most ozone-polluted cities in the nation.

In addition to contributing heavily to ozone, VOCs leaked by oil and gas wells include carcinogens, such as benzene and formaldehyde, and other toxic gases such as toluene, carbonyl sulfide and xylenes. One 2014 study found levels of benzene and formaldehyde near extraction sites that exceed recognized limits on exposure.³

The rollback would also result in up to 200,000 tons per year of methane pollution. Methane is a greenhouse gas that is 80 times more potent than carbon dioxide.⁴ As our organizations have commented to EPA on many occasions, the changing climate threatens the health of Americans alive now and in future generations. Growing evidence over the past few years has demonstrated the multiple, profound risks that imperil the lives and health of millions, including hundreds of additional studies and major reports.⁵

These current and projected health impacts of climate change include worsened ground-level ozone; wildfires and drought conditions; extreme weather; greater spread of allergens and vector-borne diseases; psychological stress from these problems; and more.

Climate change poses grave threats to public health. To protect our communities and the public, the United States must take action to limit methane pollution from the oil and gas sector, not roll back effective solutions to clean it up.

States count on EPA to provide these tools. Absent these resources to help them clean up ozone pollution, many states would lack the tools they need to protect their residents' health.

The CTGs are an effective way to help communities reduce these pollutants that harm public health. They apply in communities in nonattainment for ozone – that is, places with levels of ozone that put health at risk. These guidelines provide state and local air pollution control agencies with a toolkit of cost-effective measures that they can use to reduce pollution from the oil and gas sector. States can use these convenient, proven approaches or implement other state-specific solutions to help reduce air pollution in areas that do not meet ozone health standards.

EPA's own analysis accompanying the proposed withdrawal estimates that revoking the standards could lead to as much as 64,000 tons of additional VOC pollution per year.⁶ Increases in harmful pollution would threaten the health of many Americans around the country, particularly more vulnerable groups like children, older adults and those with lung disease.

On behalf of the communities our organizations serve, we urge you to protect public health by maintaining the CTGs as a tool for local and state governments to reduce pollution that puts the public at risk.

Sincerely,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American Lung Association

American Thoracic Society

Children's Environmental Health Network

National Environmental Health Association

¹ U.S. Environmental Protection Agency. Integrated Science Assessment of Ozone and Related Photochemical Oxidants (Final Report). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-10/076F, 2013

² Clean Air Task Force. 2016. Gasping for Breath: An analysis of the health effects from ozone pollution from the oil and gas industry. http://www.catf.us/resources/publications/files/Gasping_for_Breath.pdf

³ Macey G.P., R. Breech, M. Chernaik, C. Cox, et al. 2014. Air Concentrations of Volatile Compounds near Oil and Gas Production: A Community-Based Exploratory Study. *Environmental Health* 13:82.

⁴ https://www.ipcc.ch/pdf/assessment-report/ar5/wg1/WG1AR5_Chapter08_FINAL.pdf

⁵ Hundreds of studies on the health effects of climate change have been published since EPA adopted the Clean Power Plan. This list includes just a sample: Watts N, Amann M, Ayeb-Karlsson S, Belesova K et al. 2018 The Lancet Countdown on health and climate change: from 25 years of inaction to a global transformation for public health. Lancet 391: 581-630; Ahdoot S, Pacjeco SE, and The Council on Environmental Health. 2015. Global Climate Change and Children's Health. Pediatrics 138: e1-e17; Petlova EP, Vink JK, Horton RM, Gasparini A, et al. 2017. Towards more comprehensive projections of urban heat-related mortality: estimates for New York City under multiple population, adaptation, and climate scenarios. Environ Health Perspect. 125: 47-55; National Research Council. 2015. Modeling the Health Risks of Climate Change: Workshop Summary. Washington, DC: The National Academies Press.; Short EE, Caminade C, and Thomas BN. Climate Change Contribution to the Emergence or Re-Emergence of Parasitic Diseases. 2017. Infectious Diseases: Research and Treatment. 10:1-7.

⁶ https://www.epa.gov/sites/production/files/2018-03/documents/ctg_proposed_withdrawal_fact_sheet_3.1.18.pdf