



January 31, 2022

The Honorable Michael Regan,

Administrator
 U.S. Environmental Protection Agency
 1200 Pennsylvania Ave.
 Washington, DC 20450

Docket ID: EPA-HQ-OAR-2021-0317

Dear Administrator Regan:

As representatives of health organizations and societies committed to patient care and public health, we are compelled to advocate for actions to defend those at risk of environmental health harms. The U.S. Environmental Protection Agency (EPA) proposal to limit the release of methane, is prudent and necessary to mitigate the immediate and long-term health risks resulting from the extraction, transportation and storage of oil and gas. We urge EPA to follow the science and strengthen the proposed standards for new and existing sources, and quickly finalize them into law.

As health organizations, we serve multiple interests including patients, practitioners and caregivers as well as health systems and institutions. Enforceable rules to limit leaking of

methane and toxic air pollutants will immediately benefit public health in communities across the country and help mitigate the worst effects of global climate change.

The standards will reduce emissions of volatile organic compounds (VOCs), which include gases identified as hazardous air pollutants such as benzene, toluene, carbonyl sulfide, ethylbenzene, mixed xylenes and n-hexane. Benzene and formaldehyde, another hazardous pollutant from oil and gas emissions, are known human carcinogens, while ethylbenzene is considered a probable carcinogen. 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.

The standards will also reduce emissions of methane. Methane is more than eighty times more potent as a greenhouse gas than carbon dioxide. Climate change puts at risk the ability of health professionals to help the public and deliver life sustaining care, as witnessed by news reports of unprecedented severe weather and wildfires. Further negative impacts of climate change, including increased risk from vector borne illness, water borne illness, and allergies, have the potential to further strain American healthcare.

We urge EPA to strengthen the proposed standards by requiring increased frequency for leak detection and repair surveys, especially at smaller well sites. We also urge EPA to prohibit not only venting of methane gas, but also routine flaring. Requiring frequent monitoring and modern/zero-emitting equipment is critical to protecting public health. We also urge the agency to address emissions from additional sources beyond the proposal, including abandoned and unplugged wells.

As health organizations, our work involves both employees and employers and as such, we recognize the importance of meaningful careers to families and communities. These measures to reduce methane and VOC emissions are cost-effective and efficient. We urge EPA to set the strongest limits to protect public health and the environment.

Signed,

Asthma and Allergy Foundation of America – Michigan Chapter

Colorado Public Health Association

CommonSpirit Health

Greater Boston Physicians for Social Responsibility

Illinois Public Health Association

Indiana Public Health Association

Maine Public Health Association

Mass General Center for the Environment and Health

Maternal and Child Health Access

MI Air MI Health
Michigan Clinicians for Climate Action
Michigan Public Health Association
Missouri Public Health Association
Montana Public Health Association
Nevada Public Health Association
New Hampshire Public Health Association
New Jersey Public Health Organization
New Mexico Public Health Association
New York State Public Health Association
Pennsylvania Public Health Association
Prevention Institute
PSR Colorado (Physicians for Social Responsibility)
Regional Asthma Management & Prevention
San Francisco Bay Physicians for Social Responsibility
St. John's Community Health
Texas Allergy, Asthma and Immunology Society
Vermont Public Health Association
Washington State Public Health Association
Wisconsin Asthma Coalition
Wisconsin Environmental Health Network
Wisconsin Health Professionals for Climate Action