

ENVIRONMENTAL HEALTH PROJECT

DEFENDING PUBLIC HEALTH SINCE 2012

environmentalhealthproject.org

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Environmental Protection Agency
EPA Docket Center Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2021-0317 EPA's Supplemental Proposal to Reduce Pollution from Oil and Natural Gas Operations: Key Changes Since the November 2021 Proposal and Areas Where EPA is Seeking Comment

Introduction

EHP is a data-driven, public health organization headquartered in McMurray, Pennsylvania, just south of Pittsburgh. EHP provides wide-ranging support to communities impacted by oil and gas development. This support includes health impact assessments, environmental and health monitoring, data research and interpretation, and public health guidance. We are a skilled group of health professionals, scientists, community educators, analysts, and policy and communications experts.

EHP has a decade of community science experience, working directly with frontline residents concerned about how their health has been, or may be, impacted specifically by shale gas operations (SGD), sometimes called hydraulic fracturing or fracking. Our primary vehicle for community engagement is our HealthWatch program, which mobilizes individuals to gather air quality data using a network of particulate matter (PM2.5) and volatile organic compound (VOC) monitors. That information is then analyzed and displayed in our AirView App to help residents understand immediate health risks and long-term trends in local air quality.

EHP is in full support of the EPA's updated methane rule and its goal to reduce methane emissions in the U.S. We believe a stronger rule will help to curb air pollution from the shale gas industry, which jeopardizes the health of countless Americans. Improved standards of performance for new, reconstructed, and modified sources, as well as emissions guidelines for existing sources, will better protect public health and save lives across the nation.

Health Impacts

Methane emissions put public health at risk in several ways. A potent greenhouse gas, methane, worsens the effects of climate change, which carries with it a wide range of public health concerns. Methane's contribution to climate change and broad-reaching adverse health outcomes associated with it are not in question. However, it is important to note that methane released from shale gas operations, and the toxic pollution that accompanies it, can also seriously impact the health of residents in localized

circumstances and contribute to the deterioration of regional air quality. Additionally, leaks of methane and other harmful pollution—VOCs, PM_{2.5}, radium, and other toxic substances—can contribute to the worsening of air, water, and soil quality. They can seriously impact the health of residents living near wells, pipelines, processing plants, compressor stations, and other shale gas operations.

Over the past 10 years, EHP has met with residents living near shale gas operations and witnessed firsthand a host of troubling health impacts. Studies have found that these pollutants raise the risk of asthma and other respiratory illnesses, heart disease and heart attacks, birth defects and pre-term deliveries, mental health issues, and cancer, among other health impacts. Those with existing health conditions may suffer worsening symptoms and are more likely to end up in the hospital. We have witnessed these health impacts first-hand in the communities we serve. Improved regulation of these pollutants would help protect public health from their harmful effects.

Hundreds of investigative reports corroborate these studies by demonstrating similar health impacts, with some demonstrating elevated levels of toxic chemicals in the blood, urine, hair, and nails of people living close to shale gas development. If one looks at the facts revealed by these studies, there can be no mistake that shale gas development puts public health at risk. Strong governmental intervention is required to help stem this serious public health threat.

Recommendations

While EHP is in favor of the proposed rule, there are some areas in which EHP believes there is still room for improvement. EHP urges the EPA to look at:

1. Providing a clear pathway for communities and individuals to engage in the Super Emitter Response Program, which is designed to quickly address large oil and gas leaks while providing monitoring technologies and data to all. EPA should investigate ways to ensure all communities have the resources and support to engage in this program. EPA should also ensure that all data associated with super emitter events be made public as soon as possible and that response activities be communicated to communities as they happen.
2. Ensuring well operators capture gas and limit flaring when it's necessary to perform these operations for safety or maintenance reasons.
3. Strengthening the rule to address emissions from storage tanks by making the standards applicable to more tanks.

Conclusion

The EPA's updated methane rule is an important step forward in addressing the climate crisis and protecting the health and safety of communities across the country. EHP fully supports the EPA in this updated rulemaking and urges its approval to better protect the health of residents from hazardous air emissions. Thank you for caring about the health of our families.

Nathan Deron, MS
Environmental Data Scientist
nderon@environmentalhealthproject.org
724-260-5504