Comments of Bryan Burton – As Prepared for Delivery
Manager, Advocacy, Healthy Air
American Lung Association
To
Environmental Protection Agency Public Hearing for the Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems
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Hello, my name is Bryan Burton and I am the Advocacy Manager for Healthy Air for the American Lung Association.

The American Lung Association strongly supports accurate accounting of emissions. We also support the proposed changes to deal with malfunctions and the proposed requirement to better report large intermittent emissions events. However, these changes to subpart W must go further to protect our most vulnerable citizens.

In 2019 following a spate of cancer diagnosis among children and pregnant women in southwestern Pennsylvania, the State Department of Health partnered with the University of Pittsburgh to study the possible health risks of our oil and gas industries. In three reports released just last week, the relationship between adverse outcomes and the proximity to gas operations has become more clear. [i]Children living within a mile of a well had a 500-700% greater risk of developing lymphoma and other cancers than their counterparts. [ii]Also, they found a "strong link" between natural gas development and "severe exacerbations, emergency department visits and hospitalization for asthma in people living within 10 miles of one or more wells producing natural gas." [iii]Finally, the research concluded that mothers gave birth to smaller babies when living in proximity to active wells, compressor stations and waste facilities. Pennsylvania's studies join a growing body of scientific and medical evidence that shows adverse health impacts on people living nearby oil and gas activities.

The EPA should use basin-level measurement data and top-down approaches, such as continuous aerial monitoring, to detect and quantify especially-large emissions, particularly super-emitters, from oil and gas sources. Large emission events, or "super-emitters," can be a significant source of GHGs and will be required to be reported. Continuous optical gas imaging (OGI) is a simple, non-invasive, qualitative process that consists of surveying the facility with a specialized infrared camera that makes gas leaks readily apparent on a screen. This technology would result in more frequent and accurate data, and it would help catch emissions data for potential super emitter incidents. Once detected, these significant leaks should be repaired within 5 days and the emitter required to submit a plan to prevent future emissions incidents from occurring.

Furthermore, we encourage EPA to reduce the current reporting limit and methane emissions charge threshold of 25,000 metric tons of CO_2 equivalent (mt CO_2e) to 10,000 metric tons of carbon dioxide equivalent (CO_2e), as originally proposed.

Once finalized, these revisions must require that all reported data, including those under the proposed revisions to the onshore oil and gas production, gathering, and boosting industries, remain publicly available. Reliably consistent and accurate measurement of greenhouse gas emissions are the only way

to fairly implement the provisions of the Inflation Reduction Act's (IRA) methane fee across the oil and gas industry. To this end, there must be strong guardrails in place and mandatory, independent, third-party verification measures actively enforced to ensure a level playing field between all private firms in the oil and gas industry as well as trustworthy information sharing between state and local environmental regulators.

Thank you for the opportunity to provide comments and for moving forward on removing a large, achievable source of climate warming emissions from our atmosphere. We look forward to continuing engagement with the Agency as it implements this and further pieces of the Methane Emissions Reduction Program.

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[i] Report_Cancer_outcomes_2023_August (pitt.edu)

[ii] Report_Asthma_outcomes_Revised_2023_July (pitt.edu)

[iii] Report_Birth_outcomes_Revised_2023_July (pitt.edu)