



## **Socially Responsible Investment Coalition**

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### **Comments on the “Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review,” proposed rule changes for New Source Performance Standards**

Docket No. EPA-HQ-OAR-2017-0757  
Via email at [a-and-r-docket@epa.gov](mailto:a-and-r-docket@epa.gov)

Dear Acting Administrator Wheeler,

On behalf of the undersigned representatives of organizations allied through the Interfaith Center on Corporate Responsibility (ICCR), we write to give voice to the urgency of controlling methane leaks from oil and natural gas wells and to express our opposition to the changes proposed by the U.S. Environmental Protection Agency (EPA) to the Emission Standards for New, Reconstructed, and Modified Sources Review within the Oil and Natural Gas Sector, also referred to as the New Source Performance Standards (NSPS, or “the Rule”).

According to a statement published by the Physicians for Social Responsibility, this Environmental Protection Agency (EPA) proposal eliminates key provisions of the 2016 New Source Performance Standards (NSPS), which provide critical health and safety protections to prevent harm to public health from methane emissions and prevent potential methane leaks. In the proposed amended rule, the EPA will aim to eliminate federal requirements that oil and gas companies install technology to inspect for and fix methane leaks from wells, pipelines and storage facilities.<sup>1</sup>

In response to this announcement, the Alliance of Nurses for Healthy Environments’ Executive Director, Katie Huffling, MS, RN, CNM issued the following statement: “The oil and gas industry in the United States releases over 13 million metric tons of methane pollution every year, and with that many more dangerous air pollutants. Methane pollution poses a serious and immediate risk to the health of Americans and should be addressed with seriousness and urgency.”<sup>2</sup>

We the undersigned are deeply concerned that the proposed rule changes will inflict significant harm on public health. Fugitive emissions, or leaks, of methane, frequently accompanied by volatile organic compounds (VOCs), occur throughout the process of natural gas and oil extraction, processing and transport. Methane leaks accelerate climate change and thus increase health threats worldwide. Leaks of VOCs endanger the health of people living near oil and gas infrastructure.

The changes that the EPA is proposing to the NSPS would reduce the frequency of monitoring and lengthen the time operators have to repair leaks, thus exacerbating the amount of methane and VOCs allowed to escape into the atmosphere. This would have the effect of increasing the health threats facing millions of Americans, as well as people around the world.

#### **Methane Contributes To Climate Change, Thus Harming Health**

Methane is a potent greenhouse gas and as such is a major contributor to climate change, a fact documented widely and acknowledged by the EPA.<sup>3</sup> Increases in world average temperatures already lead to heat waves, wildfires, increased rainfall, flooding, extreme weather events, and other climate change phenomena that harm human health. Across the country,

health professionals, scientists, community members, elected officials and even oil and gas industry companies themselves such as BP, Shell, and Exxon have spoken out in opposition to these rollbacks.<sup>4</sup>

The U.S. Global Change Research Program, a multi-agency governmental body, published in 2016 an extensive report summarizing the impacts of climate change on human health in the United States. The report examined temperature-related death and illness, air quality impacts, impacts of extreme events, vector-borne diseases, water-related illness, food safety and distribution, and mental health and well-being.<sup>5</sup> In each category the report identified current and projected impacts on human health; these were found to include increases in premature heat-related deaths, waterborne illnesses, cardiovascular and respiratory health issues, and cases of PTSD and anxiety due to extreme weather conditions.<sup>6</sup> Separately, the National Institute of Environmental Health Sciences released a report in 2016 focused on the need for more research into the health effects to which climate change would contribute. The report expressed concern over malnutrition, neurological diseases, cancer, asthma, and exposure to toxic contaminants, among many factors affecting health.<sup>7</sup>

The severity and extent of the anticipated impacts from climate change make it imperative that we maintain the most rigorous rule possible for reducing methane leakage into the atmosphere.

### **Volatile Organic Compounds Harm Health**

Volatile organic compounds (VOCs) are a group of chemicals with low evaporation points that can react with other chemicals in the atmosphere. Several VOCs are of concern to human health, either through their direct effects or their contribution to creating ground-level ozone. VOCs in the presence of sunlight and heat combine with nitrogen oxides to form ground-level ozone, a pollutant that damages the lungs, contributes to asthma attacks, aggravates other chronic lung diseases and pre-existing heart diseases like angina, and has been found likely to cause premature deaths.

### **Health Effects Can And Should Be Quantified And Monetized**

Americans need protection from the health effects of natural gas, especially the roughly 17.6 million Americans who live near active oil and gas operations and face serious health risks associated with fugitive emissions.<sup>8</sup>

Each year the oil and gas industry emits more than 8 million tons of health-harming methane, fine particles, nitrogen oxides, and other pollutants into our air. Exposure to these pollutants can cause cancer, adverse birth outcomes, blood disorders, neurological problems, reproductive problems, increased hospitalizations, respiratory diseases, and asthma attacks. In addition, many of these pollutants combine with heat and sunlight to form ground level ozone, or smog. A powerful lung irritant, smog can reduce lung function, trigger asthma attacks, and aggravate respiratory conditions.<sup>9</sup>

In a report released this summer, scientists who work for the EPA joined with other researchers to publish a peer-reviewed article estimating particulate matter-related and ozone-related health effects from the oil and natural gas industry as a whole. They predicted for 2025 that these would account for 1,970 premature deaths, 39,000 individuals with upper and lower respiratory symptoms, 3,600 emergency room visits, and 1.1 million asthma attacks related to these emissions.<sup>10</sup> The attributable portion of these deaths, hospitalizations and illnesses should be included in the cost-benefit analysis being used to justify the proposed changes to the methane NSPS. Yet, in fact, the EPA is moving in the opposite direction. Despite listing the serious health risks associated with fugitive emissions in Table 3-1 in the Regulatory Impact Analysis, the

Agency does not quantify or monetize them in performing the cost-benefit analysis.<sup>11</sup> We refer here to such health outcomes that EPA usually models, such as incidences of premature mortality, non-fatal heart attacks, respiratory and, cardiovascular hospital admissions, and asthma attacks. EPA should also recognize that while no models exist to quantify the impact on reproductive and developmental effects and cancer, the evidence indicates that these effects would also be reduced.<sup>12</sup> Failing to account for the gains to be had by reducing these incidences greatly distorts the cost-benefit analysis.

## **Conclusion**

Methane pollution from the oil and gas industry is dangerous and a serious public health threat. Americans depend on federal methane safeguards to keep the air they breathe clean. The EPA has a responsibility to reduce methane pollution by holding oil and gas companies accountable for checking for and repairing leaking equipment. Comprehensive standards will help protect the people who live near oil and gas facilities from harmful methane pollution that worsens asthma and other respiratory illnesses.

As the recent IPCC Special Report 1.5 outlined, the next 12 years are critical to reducing emissions of greenhouse gases to slow climate change and protect us from the profound impacts on the environment, food supply, and human health that will arise with increased global temperatures. To strip away environmental protections and allow for increased methane emissions, as the proposed changes to the methane NSPS would do, would contribute to these potentially catastrophic impacts. In addition, the changes would contribute to human health impacts through exposure to fugitive emissions of VOCs.<sup>13</sup>

It is the EPA's mission to protect the environment and human well-being. The changes proposed to the Rule would jeopardize human health. On behalf of the following signatories, we call on the EPA to reject the changes proposed to the Rule and instead to vigorously enforce the existing and far more health-protective New Source Performance Standards.

Respectfully,

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## NOTES

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<sup>1</sup> Alperstein, Olivia. (2019). *PSR Opposes Trump EPA's Reckless Attempt To Undo Key Health And Safety Protections Regarding Methane Emissions And Leaks*. Physicians for Social Responsibility, Washington, DC. <https://www.psr.org/blog/2019/08/29/physicians-for-social-responsibility-opposes-trump-epas-reckless-attempt-to-undo-key-health-and-safety-protections-regarding-methane-emissions-and-leaks/>

<sup>2</sup> Cook, Cara. (2019). *Elimination of EPA's Methane Rules Threatens Health*. Alliance of Nurses for Healthy Environments, Mount Rainier, MD. <https://envirn.org/epas-methane-rules/>

<sup>3</sup> Environmental Protection Agency. *Overview of Greenhouse Gases – Methane*. <https://www.epa.gov/ghgemissions/overview-greenhouse-gases#CH4percent20reference>

<sup>4</sup> Alperstein, Olivia. (2019). *PSR Opposes Trump EPA's Reckless Attempt To Undo Key Health And Safety Protections Regarding Methane Emissions And Leaks*. Physicians for Social Responsibility, Washington, DC. <https://www.psr.org/blog/2019/08/29/physicians-for-social-responsibility-opposes-trump-epas-reckless-attempt-to-undo-key-health-and-safety-protections-regarding-methane-emissions-and-leaks/>

<sup>5</sup> Crimmins, A., J. Balbus, J. L. Gamble, C.B. Beard, J.E. Bell, D. Dodgen, R.J. Eisen, N. Fann, M. Hawkins, S.C. Herring, L. Jantarasami, D. M. Mills, S. Saha, M. C. Sarofim, J. Trtanj, and L. Ziska. (2016): *Executive Summary. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment*. U.S. Global Change Research Program, Washington, DC, 24 pp. <http://dx.doi.org/doi:10.7930/J00P0WXS>

<sup>6</sup> Crimmins, A., J. Balbus, J. L. Gamble, C.B. Beard, J.E. Bell, D. Dodgen, R.J. Eisen, N. Fann, M. Hawkins, S.C. Herring, L. Jantarasami, D. M. Mills, S. Saha, M. C. Sarofim, J. Trtanj, and L. Ziska, 2016: *Executive Summary. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment*. U.S. Global Change Research Program, Washington, DC, 24 pp. <http://dx.doi.org/doi:10.7930/J00P0WXS>

<sup>7</sup> The Interagency Working Group on Climate Change and Health. (2010). *A Human Health Perspective On Climate Change: A Report Outlining the Research Needs on the Human Health Effects of Climate Change*. Research Triangle Park, NC: Environmental Health Perspectives/National Institute of Environmental Health Sciences. doi:10.1289/ehp.1002272 Available: [www.niehs.nih.gov/climatereport](http://www.niehs.nih.gov/climatereport)

<sup>8</sup> Czolowski, E. D., Santoro, R. L., Srebotnjak, T., & Shonkoff, S. B. (2017). *Toward Consistent Methodology to Quantify Populations in Proximity to Oil and Gas Development: A National Spatial Analysis and Review*. *Environmental Health Perspectives*, 125(8). doi:10.1289/ehp1535

<sup>9</sup> Clean Air Task Force. *Gasping for Breath: An Analysis of the Health Effects from Ozone Pollution from the Oil and Gas Industry*. 2016. <http://catf.us/resources/publications/view/226>

<sup>10</sup> Fann, N., Baker, K.R., Chan, E.A.W., Eyth, A., Macpherson, A., Miller, E., Snyder, J. (2018) *Assessing Human Health PM2.5 and Ozone Impacts from U.S. Oil and Natural Gas Sector Emissions in 2025*. Environmental Science & Technology 52 (15), pp. 8095-8103. DOI: 10.1021/acs.est.8b02050

<sup>11</sup> Environmental Protection Agency. (2018). 83 FR § 52056. *Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration- Regulatory Impact Analysis*.

<sup>12</sup> Environmental Protection Agency. (2018). 83 FR § 52056. *Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration- Regulatory Impact Analysis*.

<sup>13</sup> Intergovernmental Panel on Climate Change Special Report on Global Warming of 1.5°C (IPCC SR1.5). <http://www.ipcc.ch/report/sr15/>