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**Testimony of Sarah Ann Smith, MESC**  
Clean Air Task Force

**Clean Air Task Force**  
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**EPA Hearing on Proposed Changes to Emissions Standards for the Oil and Gas Sector**  
Docket Identification Nos. [EPA-HQ-OAR-2017-0483, FRL-9984-38-OAR]

EPA Region 8 Office  
1595 Wynkoop Street  
Denver, Colorado 80202

Good morning. My name is Sarah Smith, and I appreciate the opportunity to testify on behalf of Clean Air Task Force. EPA's 2016 emissions standards for the oil and gas sector are vital safeguards for public health and for our climate, reducing smog-forming VOC pollution, air toxics, and the climate super pollutant methane. My organization will submit detailed written comments opposing the Agency's proposal to weaken these safeguards. Today, I will focus my remarks on EPA's failure to quantify the health and welfare benefits that would be lost as a result of the Agency's proposed changes.

In its proposal, EPA claims that the increased VOC emissions "may. . . degrade air quality and adversely affect health and welfare effects" and that "data limitations prevent the EPA from quantifying forgone VOC-related health benefits."

Both statements are wrong. First, the increased VOC emissions caused by this proposal WILL degrade air quality and adversely affect health and welfare effects. Simply stated, as the people of Colorado know, air pollution from the oil and gas industry certainly does harm human health and increasing this pollution – as EPA's proposal will do – will increase that harm.

Second, the public health impacts of oil and gas pollution, and measures such as EPA's proposal which will increase emissions, certainly can be quantified. In fact, just this past summer, EPA's own scientists published a peer-reviewed study quantifying the industry's impacts. They found that air pollution from oil and gas is expected to cause 1,970 premature deaths, 1.1 million asthma attacks and 770,000 lost school days for children, and 100,000 lost work days for adults each year, along with many other serious impacts.

These results from EPA are consistent with a study Clean Air Task Force published in 2016, based on similar scientific modeling. That study calculated some of the harm oil and gas pollution causes for people living in Colorado. In 2025, more than 32,000 children in Colorado are expected to suffer summertime asthma attacks due to oil and gas pollution, missing 24,000 days of school each year, with the majority of those illnesses occurring in the metropolitan areas across the Front Range. Clearly, it is well within EPA's ability to quantify the health and welfare impacts of the increase in VOC emissions associated with the Agency's proposal.

These estimates take into account the standards Colorado put in place with their important rules in 2014, so they show that more needs to be done to clean up the air here. But Colorado



cannot control oil and gas pollution flowing across its borders – the people of Colorado need EPA to help protect them. In contrast, the proposed rule being discussed today would only increase the emissions and the associated health impacts. In fact, EPA's proposal would roll back standards requiring measures that have been in place for several years in Colorado, and the industry has thrived here with those standards in place. There's no reason oil and gas producers in upwind states, and elsewhere in the country shouldn't be required to implement these reasonable measures.

In conclusion, EPA should withdraw the proposal, which unnecessarily weakens straightforward requirements for companies to find and fix leaky equipment and fails to account for the ways in which the policy would adversely affect health and welfare.

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