



December 17, 2018

Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: EPA Docket No. EPA-HQ-OAR-2017-0483 – Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration

The American Chemical Society (ACS), the world's largest scientific society, is concerned by the potential impact of the emission standards reconsideration on climate and public health. The proposed changes could contribute to degradation of both climate and health when compared to the current standards due to increased methane, volatile organic compound (VOCs), and particulate emissions. The reduced frequency of leak inspection under the proposed rule will cause additional emissions as leaks go undetected. As methane is a potent greenhouse gas (GHG), these increased emissions will exacerbate climate change.

U.S. government policies should encourage the market to incorporate the full lifecycle cost of energy sources into their prices. While EPA anticipates savings from easing regulatory compliance, the potential health consequences of the updated rule have not been quantitatively valued. ACS recognizes the difficulty of quantifying the health benefits of reduced emissions, but stresses the importance of doing so when reconsidering emission standards. A qualitative assessment does not sufficiently capture the potential value of improved health from more stringent standards.

The recently released fourth National Climate Assessment (NCA) underscores the variety of hazards presented by climate change to the United States, including "more frequent and intense extreme weather and climate-related events" that will threaten infrastructure and ecosystems across the nation. The NCA anticipates staggering economic losses in some sectors, such as agriculture and tourism, reaching hundreds of billions of dollars annually by the end of the century.

In light of these consequences, ACS supports the U.S. government taking meaningful steps to reduce GHG emissions to moderate the impact of climate change. By EPA's own estimate, its alternative testing standards would instead lead to an increase in GHG emissions. As such, ACS believes that the present standards should be kept, and any future modifications should reduce emissions.

Respectfully Submitted,
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