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**Remarks for Public Comment**

EPA's Technology Review and Reconsideration of the 2012 Final Rule  
Amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for  
Oil and Natural Gas Production, and Transmission and Storage Facilities

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Ref. Docket ID No. EPA-HQ-OAR-22025-1348; FRL-5732-02-OAR

Thank you for holding this hearing. I appreciate the opportunity to comment on EPA's Technology Review and Reconsideration of the 2012 Final Rule amending the National Emission Standards for Hazardous Air Pollutants (NESHAP) for oil and natural gas production and transmission and storage facilities.

The Breathe Project is a collaboration of more than 50 organizations working to improve air quality, reduce climate pollution, and advance public health in southwestern Pennsylvania. We include public health professionals, academics, environmental advocates, and community members, and we rely on the best available health, epidemiological, and air quality science to inform the public and support meaningful engagement.

Based on our experience in southwestern Pennsylvania during two decades of oil, gas, and petrochemical expansion, the Breathe Project urges EPA not to finalize several proposed changes and instead to adopt alternative approaches that provide better information, stronger controls, and more protective public health safeguards for oil and gas production and for transmission and storage facilities.

Pennsylvania has experienced a large expansion of oil and gas infrastructure, including unconventional wells, impoundments, disposal pits, injection wells, pipelines, compressor stations, cryogenic fractionator plants, and petrochemical manufacturing facilities such as ethane crackers. This buildout has been associated with spills, hazardous air pollutant emissions, and documented impacts to water resources and communities.<sup>[1]</sup>

Specifically, the Breathe Project requests EPA to choose alternate updates in the proposal that:

- Reduce fugitive emissions from extraction equipment by requiring regular leak monitoring, shorter repair deadlines, and allowing a wider range of qualified leak detection methods.
- Require optical gas imaging (OGI) or equivalent technologies that detect leaks, given the public health benefits relative to the marginal compliance costs.
- Strengthen cumulative impact evaluation by requiring aggregated emissions accounting for co-located equipment and nearby sources when determining applicability, controls, and reporting for communities in close proximity.
- Include currently unregulated emissions points in required emissions reporting and regulations, such as storage vessels, transport loading operations, process controllers, and natural gas pumps.
- Expand collection of emissions information beyond BTEX as a surrogate, because there are many other hazardous air pollutants emitted at production facilities and transmission facilities that impact communities in their proximity, and people have a right to know about such emissions.

We believe EPA should hear from residents of southwestern Pennsylvania because this region already faces elevated pollution burdens and is also experiencing proposed expansions of gas-fired power plants and additional fracking development. Key reasons include:

According to a report completed by the Clean Air Task Force, Allegheny County is in the top 1% of all counties in the US for cancer risk from point source air toxin emissions ([Cancer Risk in Allegheny County, Pa., May 2021](#)). In southwest Pennsylvania, people in the Mon Valley have air that is worse than 95 percent of the entire country for particulate matter. In 2024 these residents have suffered air quality that is ranked in the [top 10 worst airsheds](#) in the US 20% of all days for at least a portion of the day based on EPA's Air Quality Index hourly values. The Mon Valley residents know too well the toll that high levels of toxic emissions take on their lungs and heart health.

Asthma among children in the Mon Valley is already alarmingly high, and additional emissions would add to that burden. In a study of 1,200 children attending schools near point-source pollution in Allegheny County, 70% were exposed to pollution at an annual mean level greater than the World Health Organization's recommended upper limit for annual average exposure, compared with 3.1% nationally. Children exposed above this threshold had 58% higher odds of asthma than children exposed below the WHO-recommended limit. The area is also an environmental justice community with a high percentage of low-income and African American families; asthma prevalence in the study was highest among African Americans (26.8%) and among children ages 10–12 (26.7%) on public health insurance. <sup>[2]</sup>

More broadly, our region's 2.6 million people are at risk because of planned expansions of the Invenergy natural gas power plant, a proposed gas-based hydrogen hub, and the existence of a large number of operating and abandoned natural gas wells in the region. This includes vulnerable populations who bear disproportionate risks from current levels of air pollution: 55,269 children with pediatric asthma; 213,963 people with adult asthma; 160,478 people with COPD; 228,249 people with cardiovascular disease; 267,874 people living with low incomes; and 372,912 people of color.<sup>1</sup> The environmental justice concerns are clear, substantial, and must play a prominent role in setting updated standards.

We respectfully urge EPA to strengthen these standards to better protect public health, reduce disproportionate burdens on vulnerable communities, and ensure meaningful transparency and accountability for hazardous air pollutant emissions.

Thank you for your time and consideration.

Sincerely,

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<sup>1</sup> ALA SOTA 2022, Available online: <https://www.lung.org/research/sota/city-rankings/states/pennsylvania/allegheny>, accessed 12/05/22.