



November 18, 2024

Air Quality Control Commission
4300 Cherry Creek Drive South
Denver, CO 80246

Re: Proposed Reg. 7 revisions on pneumatic controllers & pumps

Dear Commissioners,

Thank you for your hard work and dedication to improving air quality in our state.

On behalf of [CoPIRG Foundation](#), the Colorado Public Interest Research Group Foundation, I would like to offer comment on the proposed policy to further cut emissions from oil and gas operations by revising Regulation 7 regarding pneumatic controllers and pumps.

As you know, ozone pollution threatens the health of many Coloradans. Rather than being emitted directly, ground-level ozone is formed when nitrogen oxides (NOx) and volatile organic compounds (VOCs) combine chemically in the presence of sunlight; these reactions occur more quickly at higher temperatures. NOx and VOCs come from a variety of sources in our state such as the oil & gas sector, tailpipe emissions from the cars and trucks we drive, industrial sources, gas-powered lawn equipment and more.

Breathing high levels of ozone can cause [harmful health effects](#) including lung damage, worsening of existing respiratory conditions such as asthma, and [cardiovascular disease](#). A 2016 study even found that long-term exposure to elevated levels of ozone – such as those we experience in our region – is associated with [decreased life expectancy](#).

In recent years, the Denver Metro/North Front Range (DM/NFR) region – roughly from Castle Rock up through Fort Collins and Greeley – has suffered from some of the highest ozone pollution in the country. According to the American Lung Association's latest State of the Air report, three counties in the region – Jefferson, Douglas and Arapahoe – rank among the [top 20 most polluted counties in the nation for ozone](#) levels.

To protect our health, we need to get ozone concentrations in our air down from unsafe levels as quickly as possible – below the EPA's latest standard of 70 parts per billion (ppb). Of course our best chance for doing this is to reduce the amount of NOx and VOCs entering our air.

We are grateful that you are considering measures to further cut pollution from oil & gas operations.

As you consider revisions to Regulation 7, we first of all call on you to approve the request for rulemaking. Then, we urge you to adopt a policy that will cut emissions from pneumatic controllers and pumps as quickly as possible.

The zero-bleed pneumatic controller and pump retrofit phase-in should begin in 2025. We are already in severe violation of the Clean Air Act; we should no longer tolerate intentional, preventable releases of ozone-forming pollution into our air.

The proposed control measures on pneumatic controllers and pumps represent the next piece of the ozone pollution puzzle and can give our region a shot at reaching compliance with National Ambient Air Quality Standards (NAAQS) for ozone during the critical 2024-26 time frame – but only if we start the phase-in sooner rather than later.

We know that the Regional Air Quality Council and Air Pollution Control Division have engaged in a lengthy process to develop these policies. We appreciate these efforts and encourage you to approve policies that will cut harmful air pollution as quickly as possible and help bring our region back into compliance with the health-based standards in the Clean Air Act. Our health and quality of life demand no less.

Thank you for your consideration.

Sincerely,

Kirsten Schatz
Clean Air Advocate
CoPIRG Foundation