

# Exhibit 24

Declaration of Dr. Ananya Roy and Dr. Tammy  
Thompson (July 2, 2020)

Plaintiffs' Motion For Summary Judgment

STATE OF NEW YORK, *et al.*, and ENVIRONMENTAL DEFENSE FUND

v.

ANDREW WHEELER, *et al.*

Civil Action No. 18-cv-0773 (RBW)

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
ENVIRONMENTAL DEFENSE FUND,	)	
	)	Civil Action No. 18-cv-0773 (RBW)
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
ANDREW WHEELER, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF DR. ANANYA ROY AND DR. TAMMY THOMPSON**

We, Dr. Ananya Roy and Dr. Tammy Thompson, declare:

1. I, Dr. Roy, am a Senior Health Scientist at Environmental Defense Fund (“EDF”), a non-profit organization focused on protecting human health and the environment from airborne contaminants by using sound science. I received a Sc.D. in Environmental Health from the Harvard School of Public Health. I also have Master of Science and Bachelor of Science degrees from the Department of Pharmacology at the All India Institute of Medical Sciences. As a Senior Health Scientist for EDF, I lead research on the health effects of ambient air pollution. Prior to joining EDF, I was a research faculty at the Yale School of Public Health and the Environmental and Occupational Health Sciences Institute, NJ, where my work encompassed the effect of ambient and indoor air pollution on children’s lung growth and cardiopulmonary effects, intergenerational transfer of lead, effects on neurodevelopment and associated genetic and nutritional susceptibility. My curriculum vitae is attached as Exhibit A.

2. I, Dr. Thompson, am a Senior Air Quality Scientist at EDF. I received a Ph.D. in Chemical Engineering, with a focus on atmospheric science and modeling, from the University of Texas at Austin. I also have a postdoc from the Massachusetts Institute of Technology and a Bachelor of Science in Chemical Engineering from the University of Florida. As a Senior Air Quality Scientist for EDF, my work involves advancing our air quality modeling capabilities around estimating source contributions to hyperlocal air pollution measurements, including in the oil and gas sector. Prior to joining EDF, I worked on a wide range of air quality issues as an atmospheric scientist in academia and as well as a fellow in the Environmental Protection Agency's Office of Policy and with the Congressional Research Service. As a Research Scientist funded by the National Park Service, I investigated the impact of Oil and Gas production on air quality, and human and ecosystem health in National Parks. My curriculum vitae is attached as Exhibit B.

#### **EPA's Failure to Issue Section 111(d) Guidelines for Existing Sources**

3. We are aware that the Environmental Protection Agency (EPA) has promulgated standards to reduce methane and volatile organic compound emissions at new and modified facilities in the oil and gas sector. *Oil and Natural Gas Sector Emission Standards for New, Reconstructed and Modified Sources*, 81 Fed. Reg. 35,824 (June 3, 2016) (New Source Rule). We are further aware that this triggers a legal obligation under Section 111(d) of the Clean Air Act, 42 U.S.C. § 7411(d), for EPA to issue emissions guidelines for existing sources (Methane Guidelines), but that EPA has not yet issued such guidelines.

4. We are likewise aware that EPA has requested an indefinite stay of this litigation challenging EPA's unreasonable delay in issuing Methane Guidelines for existing sources in the

oil and gas sector until EPA finalizes a proposed rule to remove the regulation of methane for new and modified sources.

### **VOCs Form Ground-Level Ozone, or Smog, that Harms Human Health**

5. Ozone forms when VOCs and oxides of nitrogen (NO<sub>x</sub>) react in the presence of sunlight. This process becomes more pronounced in the summertime.

6. A longstanding body of scientific research, including numerous EPA assessments, demonstrates that exposure to ground-level ozone harms human health. In its 2013 Integrated Scientific Assessment for Ozone, EPA concluded that “a very large amount of evidence spanning several decades supports a relationship between exposure to [ozone] and a broad range of respiratory effects.” *2013 Final Report: Integrated Science Assessment of Ozone and Related Photochemical Oxidants* (“ISA”) (EPA/600/R-10/076F) at 1-6. These effects range from decreases in lung function among healthy adults to increases in respiratory-related hospital admissions and emergency room visits, to premature death. *Id.* at 6-131 to 6-158, 6-162 to -163.

7. Multiple studies across various states (California, Georgia, North Carolina), counties (Maricopa County, AZ; Erie County, NY) and cities (Seattle, New York, Newark, Atlanta, Houston, Dallas, San Antonio, Austin, Indianapolis, St Louis) have found that changes in ozone concentrations were associated with higher asthma emergency room visits, most at concentrations below the current standard.<sup>1</sup> It is estimated that up to 11% of all asthma Emergency Room visits in the United States are attributed to ozone.<sup>2</sup> According to the Centers

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<sup>1</sup> Stephanie Holm, John Balmes, Ananya Roy, *Human Health Effects of Ozone: The State of Evidence Since EPA’s Last Integrated Science Assessment*, EDF 2018.

<sup>2</sup> Susan C. Anenberg, Daven K. Henze, Veronica Tinney, Patrick L. Kinney, William Raich, Neal Fann, Chris S. Malley, Henry Roman, Lok Lamsal, Bryan Duncan, Randall V. Martin, Aaron van Donkelaar, Michael Brauer, Ruth Doherty, Jan Eiof Jonson, Yanko Davila, Kengo Sudo, Johan C.I. Kuylenstierna, *Estimates of the Global Burden of Ambient PM<sub>2.5</sub>, Ozone, and NO<sub>2</sub> on Asthma Incidence and Emergency Room Visits*, *Environmental Health Perspectives*, 2018; 126 (10): 107004.

for Disease Control and Prevention, asthma affects 25 million Americans. Of these, 5.5 million are children and over half have uncontrolled asthma. Asthma results in 1.7 million emergency room visits, 9.7 million visits to the physician and 188 thousand hospitalizations.<sup>3</sup> Asthma costs the U.S. economy more than \$80 billion annually in medical expenses, missed work and school days and deaths.<sup>4</sup>

8. Ozone pollution is particularly harmful for vulnerable populations, such as school aged children, people with respiratory diseases or asthma, older adults, and people who are active outdoors, especially outdoor workers. *ISA* at 1-8. Children with asthma also face heightened risks from ozone exposure. Many studies have demonstrated that children with asthma experience decrements in lung function and increases in respiratory symptoms when exposed to ozone pollution.<sup>5</sup>

9. EPA concluded that there is a causal relationship or likely causal relationship between both short- and long-term ozone exposure and a broad range of harmful respiratory effects in humans. *ISA* at 1-5–1-8, Table 1-1. Short-term exposure is defined as hours, days, or weeks, and long-term exposure is measured in months to years. *Id.* at 1-4.

10. Short-term exposure to ozone can have critical health implications. For instance, there is evidence of an association between out-of-hospital cardiac arrests and short-term exposure to ozone, as reported in Ensor, et al., 2013.<sup>6</sup> Time scales of exposure up to three hours

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<sup>3</sup> Available at [https://www.cdc.gov/asthma/most\\_recent\\_national\\_asthma\\_data.htm](https://www.cdc.gov/asthma/most_recent_national_asthma_data.htm), last accessed on October 15, 2019.

<sup>4</sup> Tursynbek Nurmagambetov, Robin Kuwahara, Paul Garbe, *The Economic Burden of Asthma in the United States, 2008 – 2013*, Annals of the American Thoracic Society, (2018).

<sup>5</sup> K. Mortimer et al., *The Effect of Air Pollution on Inner-City Children with Asthma*, 19 EUR. RESPIRATORY J. 699 (2002), *ISA*, 6-120–21, 6-160.

<sup>6</sup> Katherine B. Ensor, et al., *A Case-Crossover Analysis of Out-of-Hospital Cardiac Arrest and Air Pollution*, 127 CIRCULATION 1192 (2013), <https://www.ncbi.nlm.nih.gov/pubmed/23406673>.

in duration and also at the daily level on the day of the event were significant. Other studies indicate higher rates of stroke in populations following higher exposures to ozone. A study in Pennsylvania that used a time-stratified case-crossover analysis to evaluate the relationships between stroke hospital admissions and ozone, among 26,219 patients in Allegheny County, PA, between 1994 and 2000 found that exposures to ozone on the current day increased the risk of total stroke hospitalization.<sup>7</sup> Another study in Nunces County, Texas evaluated associations with incident stroke and stroke severity with cases identified in the Brain Attack Surveillance in Corpus Christi project between 2000 and 2012 and found elevated risk of having a first stroke with higher ozone concentrations in the preceding 2 days. Effect measure estimates were not changed in a model that included PM2.5.<sup>8</sup> This is supported by two independent meta-analyses of multiple studies.<sup>9, 10</sup> This evidence augments the long-standing body of literature demonstrating the serious impacts from short-term exposure to ozone pollution, including the increased risk of premature death. *ISA* at 1-14 (concluding that there is “likely to be a causal relationship between short-term exposures to [ozone] and total mortality”). EPA has recognized that positive associations have been reported between “short-term [ozone] exposures and respiratory mortality, particularly during the summer months.” EPA, *National Ambient Air Quality Standards for Ozone*, 80 Fed. Reg. 65,292, 65,307 (Oct. 26, 2015); *see also ISA* 6-220 to 6-221.

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<sup>7</sup> Xu X, Sun Y, Ha S, Talbott EO, Lissaker CT, *Association between ozone exposure and onset of stroke in Allegheny County, Pennsylvania, USA, 1994-2000I*, *Neuroepidemiology*, 2013; 41(1):2-6.

<sup>8</sup> Wing JJ, Adar SD, Sánchez BN, Morgenstern LB, Smith MA, Lisabeth LD, *Short-term exposures to ambient air pollution and risk of recurrent ischemic stroke*, *Environmental Research*, Jan. 2017; 152:304-7.

<sup>9</sup> Shah, Anoop SV, et al., *Short term exposure to air pollution and stroke: systematic review and meta-analysis*, *BMJ* 350 (2015): h1295.

<sup>10</sup> Yang, Wan-Shui, et al., *An evidence-based appraisal of global association between air pollution and risk of stroke*, *International Journal of Cardiology* 175.2 (2014): 307-313.

11. Long-term exposure likewise has critical health implications. EPA has concluded that there is “likely to be a causal relationship between long-term exposure to [ozone] and respiratory effects.” *ISA* at 1-8. A recent study of 5,780 adults followed for a decade across 6 US metropolitan regions found that long term ozone was significantly associated with development of emphysema. This was equal to that of 29 pack-years of smoking or 3 years of aging.<sup>11</sup> Additionally, in a study of 11 million Medicare enrollees in the Southeast of USA long term ozone was associated with increased risk of first hospital admissions for stroke, chronic obstructive pulmonary disease, pneumonia, myocardial infarction, lung cancer, and heart failure.<sup>12</sup>

12. Similarly, EPA notes that “recent evidence is suggestive of a causal relationship between long-term [ozone] exposures and total mortality.” *Id.* Some longitudinal studies have further demonstrated that “long-term [ozone] exposure influences the risk of asthma development in children.” *ISA* at 7-2.

13. A recent study of almost 61 million Medicare patients conducted nationwide indicates a significant association between short and long term ozone exposure and all- cause mortality, with effects strongest in minorities and those of low socio-economic status. These effects were seen at ozone concentrations well below the current standard of 70 ppb.<sup>13, 14</sup>

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<sup>11</sup> Wang, Meng, et al. "Association between long-term exposure to ambient air pollution and change in quantitatively assessed emphysema and lung function." *JAMA* 322.6 (2019): 546-556.

<sup>12</sup> Yazdi, Mahdiah Danesh, et al. "Long-term exposure to PM2. 5 and ozone and hospital admissions of Medicare participants in the Southeast USA." *Environment international* 130 (2019): 104879.

<sup>13</sup> Di et al., *Air Pollution and Mortality in the Medicare Population*, *NEW ENGLAND J. OF MEDICINE* (June 29, 2017).

<sup>14</sup> Di Q, Dai L, Wang Y, Zanobetti A, Choirat C, Schwartz JD, Dominici F, *Association of short-term exposure to air pollution with mortality in older adults*, *JAMA* (Dec. 26, 2017); 318(24):2446-56.

14. Health effects other than cardiovascular or respiratory are also likely. A 2017 study suggested that ozone exposure may be linked to approximately 8,000 stillbirths per year.<sup>15</sup> Studies carried out in California and Florida, of over 400,000 births each, found that elevated exposure to ozone during pregnancy was associated with higher risk of pre term birth.<sup>16, 17</sup> Prolonged exposure to ozone may also accelerate cognitive decline in the early stages of dementia.<sup>18</sup> There is now accumulating evidence that suggests that ozone exposure during pregnancy can result in Autism Spectrum Disorders among children.<sup>19, 20</sup>

15. In 2015, EPA strengthened the national health-based standard for ground-level ozone, lowering the standard from 75 parts per billion (“ppb”) to 70 ppb.<sup>21</sup> The record for that rulemaking, however, along with subsequent scientific studies, demonstrates that health effects can occur at much lower levels, especially in sensitive populations. For that reason, EPA’s independent scientific advisors recommended that the agency establish the standard in the range of 60–70 ppb. Many health and medical associations suggested that lower standards may be appropriate.<sup>22</sup> EPA has issued designations for counties under the 2015 ozone standards. EPA,

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<sup>15</sup> Mendola et al., *Chronic and Acute Ozone Exposure in the Week Prior to Delivery is Associated with the Risk of Stillbirth*, 14 Int’l J. Env’tl Research and Pub. Health 731 (2017).

<sup>16</sup> Laurent O, Hu J, Li L, et al. *A statewide nested case-control study of preterm birth and air pollution by source and composition: California, 2001-2008*. Environ Health Perspect. 2016;124(9):1479-1486

<sup>17</sup> Ha S, Hu H, Roussos-Ross D, Haidong K, Roth J, Xu X. *The effects of air pollution on adverse birth outcomes*. Environ Res. 2014;134:198-204.

<sup>18</sup> Galkina Cleary et al., *Association of Low-Level Ozone with Cognitive Decline in Older Adults*, 61 J. Alzheimers Disease 1, 67-78 (2018).

<sup>19</sup> Becerra, Tracy Ann, et al, *Ambient air pollution and autism in Los Angeles county, California*, Environmental Health Perspectives 121.3 (2012) 380-386.

<sup>20</sup> Volk HE, Lurmann F, Penfold B, Hertz-Picciotto I, McConnell R, *Traffic-related air pollution, particulate matter, and autism*, JAMA Psychiatry (Jan. 1, 2013); 70(1):71-7.

<sup>21</sup> EPA, *National Ambient Air Quality Standards for Ozone*, 80 Fed. Reg. 65,292 (Oct. 26, 2015).

<sup>22</sup> *Id.* at 65,321-23; 65,355.



*Air Quality Designations for the 2015 Ozone National Ambient Air Quality Standards*, 82 Fed. Reg. 54,232 (Nov. 16, 2017); *Additional Air Quality Designations for the 2015 Ozone National Ambient Air Quality Standards*, 83 Fed. Reg. 25,776 (June 4, 2018); *Additional Air Quality Designations for the 2015 Ozone National Ambient Air Quality Standards—San Antonio, Texas Area*, 83 Fed. Reg. 35,136 (July 25, 2018).

16. According to EPA calculations, there are over 120 million people living in ozone non-attainment areas in the U.S.<sup>23</sup> and there is evidence that adverse health effects are being seen at lower concentrations too. These unhealthy levels of ozone air quality can result in acute respiratory illness and other damaging health outcomes.

**The Oil and Natural Gas Sector Is a Substantial Source of Smog-Forming Emissions**

17. The oil and natural gas sector is a substantial source of smog-forming emissions. According to EPA’s most recent National Emissions Inventory (NEI), “Oil and Gas Production” is the largest source of human-caused VOCs nationally and a major contributor to NOx emissions.<sup>24</sup> Regional analyses likewise underscore the significant ozone-forming emissions

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<sup>23</sup> <https://www3.epa.gov/airquality/greenbook/popexp.html>.

<sup>24</sup> Calculation based on EPA, National Emissions Inventory (NEI) Sector Data, *available at* <https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data> .

from these sources, including work in the Uinta Basin in Utah,<sup>25</sup> the Barnett Shale in Texas,<sup>26</sup> and in Colorado.<sup>27</sup>

18. Studies and analyses have linked ozone formation to emissions from oil and gas development. For example, a recent study by NOAA scientists at the Cooperative Institute for Research in Environmental Sciences (“CIRES”) found that, on Colorado’s Northern Front Range, oil and gas operations contribute roughly 50% to regional VOC reactivity and that these activities are responsible for approximately 20% of ozone produced locally in the nonattainment area.<sup>28</sup> This CIRES study was one of many that was included in a review published this year documenting over a decade’s worth of research demonstrating multiple lines of evidence that link regional production of ozone with emissions from oil and gas operations in the Colorado

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<sup>25</sup> Warneke, C. et al., “Volatile organic compound emissions from the oil and natural gas industry in the Uintah Basin, Utah: oil and gas well pad emissions compared to ambient air composition,” 14 *Atmos. Chem. Phys.*, 10977–10988 (2014), available at [www.atmos-chem-phys.net/14/10977/2014/](http://www.atmos-chem-phys.net/14/10977/2014/); ENVIRON, “Final Report: 2013 Uinta Basin Winter Ozone Study,” (Mar. 2014), available at [https://deq.utah.gov/locations/U/uintahbasin/ozone/docs/2014/06Jun/UBOS2013FinalReport/Title\\_Contents\\_UBOS\\_2013.pdf](https://deq.utah.gov/locations/U/uintahbasin/ozone/docs/2014/06Jun/UBOS2013FinalReport/Title_Contents_UBOS_2013.pdf).

<sup>26</sup> David T. Allen, “Atmospheric Emissions and Air Quality Impacts from Natural Gas Production and Use,” *Annu. Rev. Chem. Biomol. Eng.* 5:55–75 (2014), available at <http://www.annualreviews.org/doi/abs/10.1146/annurev-chembioeng-060713-035938>.

<sup>27</sup> Helmig, D., “Air quality impacts from oil and natural gas development in Colorado,” 8,4 *Elem Sci. Anth.* (2020), available at <https://doi.org/10.1525/elementa.398>; Brantley, et al., “Assessment of volatile organic compound and hazardous air pollutant emissions from oil and natural gas well pads using mobile remote and onsite direct measurements,” *Journal of the Air & Waste Management Association* 1096-2247 (Print) 2162- 2906 (Online) (2015); Pétron, G., et al., “A new look at methane and non-methane hydrocarbon emissions from oil and natural gas operations in the Colorado Denver-Julesburg Basin,” 119 *J. Geophys. Res. Atmos.*, 6836–6852 (2014), available at <http://onlinelibrary.wiley.com/doi/10.1002/2013JD021272/full>.

<sup>28</sup> McDuffie, E. E., et al. (2016), Influence of oil and gas emissions on summertime ozone in the Colorado Northern Front Range, *J. Geophys. Res. Atmos.*, 121, 8712–8729, doi:10.1002/2016JD025265. <http://onlinelibrary.wiley.com/doi/10.1002/2016JD025265/abstract>. See also Gilman, J. B., B. M. Lerner, W. C. Kuster, and J. A. de Gouw (2013), *Source signature of volatile organic compounds from oil and natural gas operations in northeastern Colorado*, *Environ. Sci. Technol.*, 47(3), 1297–1305, available at <http://pubs.acs.org/doi/abs/10.1021/es304119a> (finding 55% of VOC reactivity in the metro- Denver area is due to nearby O&NG operations and calling these emissions a “significant source of ozone precursors.”); Cheadle, LC et al., *Surface ozone in the Colorado northern Front Range and the influence of oil and gas development during FRAPPE/DISCOVER-AQ in summer 2014*, *Elementa* (2017), available at <http://doi.org/10.1525/elementa.254> (finding on “individual days, oil and gas O<sub>3</sub> precursors can contribute in excess of 30 ppb to O<sub>3</sub> growth and can lead to exceedances” of the EPA ozone standards).

Front Range. Another study analyzing ozone impacts associated with unconventional natural gas development in Pennsylvania concluded that “natural gas emissions may affect compliance with federal ozone standards.”<sup>29</sup> There are also well-documented connections between oil and gas development and ozone formation in Wyoming’s Upper Green River Basin and Utah’s Uinta Basin, among others.<sup>30</sup>

### **EPA’s Delay in Adopting Methane Guidelines Allows Substantial Harmful Ozone-Forming Pollution**

19. Analysis completed by Dr. Renee McVay and Hillary Hull and attached in a separate declaration found that over 90,000 wells that would be subject to Methane Guideline are located in areas that are not in attainment with the 2015 ozone standard. These wells emit 160,000 tons of VOCs annually.

20. Many Americans live in counties that experience unhealthy levels of ozone pollution. These counties have existing wells that will be able to emit harmful pollution if EPA continues to delay the promulgation of Methane Guidelines. Nationwide, it is estimated that almost 18 million people live within 1 mile of at least one active oil and/or gas site.<sup>31</sup>

21. Analysis carried out by the Clean Air Task Force found that 2,000 asthma-related emergency room visits and over 600 respiratory related hospital admissions nationally were due to ozone smog resulting from VOC and NOx emissions from oil and gas. Additionally, children

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<sup>29</sup> Swarthout, R. F., R. S. Russo, Y. Zhou, B. M. Miller, B. Mitchell, E. Horsman, E. Lipsky, D. C. McCabe, E. Baum, and B. C. Sive (2015), *Impact of Marcellus Shale natural gas development in southwest Pennsylvania on volatile organic compound emissions and regional air quality*, Environ. Sci. Technol., 49(5), 3175–3184, doi:10.1021/es504315f, available at <https://www.ncbi.nlm.nih.gov/pubmed/25594231>.

<sup>30</sup> See B. Rappenglück et al., *Strong wintertime ozone events in the Upper Green River basin, Wyoming*, Atmos. Chem. Phys. (2014), available at <https://doi.org/10.5194/acp-14-4909-2014>.

<sup>31</sup> Eliza D. Czolowsk et al., *Toward Consistent Methodology to Quantify Populations in Proximity to Oil and Gas Development: A National Spatial Analysis and Review*, 125 Env'tl. Health Perspectives 6, available at <https://doi.org/10.1289/EHP1535>.

miss 500,000 days of school each year due to poor health associated with ozone pollution.<sup>32</sup> A recent study published by scientists at EPA found that oil and gas emissions in 2025 could be attributed to cause 1900 deaths in that year alone.<sup>33</sup>

22. These impacts can disproportionately affect minority communities living in the vicinity of the oil and gas activity. For example, in Texas, there are over 800,000 Latinos living within half a mile of an oil or gas well, in Colorado nearly 3 out of 10 people living near a well are Latino, and in California 2 out of 5 people living in close proximity to a well are Latino.<sup>34</sup>

23. EPA's failure to adopt Methane Guidelines will allow additional emissions of smog-forming pollutants in these areas and communities already burdened with unhealthy levels of ozone pollution. This added pollution enhances the risk of near-term harm to children, older adults, those suffering from respiratory diseases such as asthma, low income populations, outdoor workers, and others recreating outdoors.

#### **Oil and Natural Gas Operations Emit Hazardous Air Pollutants like Benzene, a Known Human Carcinogen**

24. Oil and natural gas operations also emit several different hazardous air pollutants ("HAP") from equipment leaks, processing, compressing, transmission and distribution, and storage tanks. HAPs emitted from oil and gas operations include benzene, a known carcinogen. In issuing the New Source Rule, EPA recognized the negative health and welfare consequences

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<sup>32</sup> Clean Air Task Force, *Gasping for Breath: An analysis of the health effects from ozone pollution from the oil and gas industry* (2016).

<sup>33</sup> Fann, Neal, et al., *Assessing human health PM2.5 and ozone impacts from US oil and natural gas sector emissions in 2025*, *Environmental Science & Technology* 52.15 (2018): 8095-8103.

<sup>34</sup> *Latino Communities at Risk: The Impact of Air Pollution from the Oil and Gas Industry*, Clean Air Task Force (CATF), League of United Latin American Citizens (LULAC), National Hispanic Medical Association (NHMA) 2016.

of HAPs emitted from oil and gas extraction and the health benefits the Rule provides by reducing HAP emissions in addition to methane and VOC emissions.<sup>35</sup>

25. There is no safe level of human exposure to many of the toxic pollutants released as a result of oil and gas extraction. Exposure to HAPs can cause cancer and seriously impair the human neurological system. For example, EPA has found that benzene, found naturally in oil and gas, is a “known human carcinogen (causing leukemia) by all routes of exposure, and... that exposure is associated with additional health effects, including genetic changes in both humans and animals.”<sup>36</sup>

26. Further, a “number of adverse noncancer health effects including blood disorders, such as preleukemia and aplastic anemia, have also been associated with long-term exposure to benzene.”<sup>37</sup> Along with benzene, EPA has also catalogued the harmful effects of other specific air toxics emitted from oil and gas operations, including toluene, carbonyl sulfide, ethylbenzene, mixed xylenes, n-hexane, and other air toxics.<sup>38</sup> Each of these hazardous pollutants is harmful to human health. For example, the serious health effects associated with exposure to toluene range from the dysfunction of the central nervous system to narcosis, with effects “frequently observed in humans acutely exposed to low or moderate levels of toluene by inhalation.”<sup>39</sup>

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<sup>35</sup> EPA, *Regulatory Impact Analysis of the Final Emission Standards for New and Modified Sources in the Oil and Natural Gas Sector Sources* (“EPA RIA”), EPA-452/R-16-002, 4-28–4-37 (May 2016), available at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2010-0505-7630>.

<sup>36</sup> EPA RIA at 4-33.

<sup>37</sup> *Id.* at 3-34.

<sup>38</sup> *See id.* 4-33- 4-37.

<sup>39</sup> *Id.*

27. Many Americans live in very close proximity to these wells. These Americans will be exposed to additional hazardous air pollutants, increasing their risk of experiencing adverse health outcomes.

28. An important 2019 study funded by the Colorado Department of Public Health and Environment, used weather and emissions data measured in Colorado, with state of the science dispersion modeling tools to map concentrations of air toxics from 3 sizes of oil and gas fields, finding both an elevated lifetime cancer risk and non-cancer health risks for the population living in close proximity to oil and gas fields. Specifically, the study found both elevated cancer and non-cancer health risks.<sup>40</sup>

29. Benzene exposures from production emissions (from existing wells), and all activities combined (drilling, fracking, flow back and production), were associated with an increased lifetime risk (above one in a million) of leukemia for the average individual at 500 feet. Risks in the most exposed populations (people who live downwind and spend more time outdoors) only dropped below the one-in-a-million risk threshold after a distance of 2000 feet from the well.

30. The study also found elevated non cancer risks due to VOC exposures. Benzene and 2-ethyltoluene emissions from oil and gas in Colorado resulted in maximal acute exposures higher than considered safe for most populations 500 feet away. Exposures of benzene were more than 10 times higher than considered safe for acute exposure and should be considered a risk for blood disorders. Blood disorders could result in anemia, disturbances in clotting or the ability to fight infections, and could manifest as fatigue, nose bleeds or infections. The study

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<sup>40</sup> See; Final Report: Human Health Risk Assessment for Oil & Gas Operations in Colorado. ICF. Submitted to Colorado Department of Public Health and Environment. October 17, 2019 [https://drive.google.com/file/d/1pO41DJMXw9sD1NjR\\_OKyBJP5NCb-AO0I/view](https://drive.google.com/file/d/1pO41DJMXw9sD1NjR_OKyBJP5NCb-AO0I/view)

also found the potential for neurotoxic effects, such as headaches, blurred vision and dizziness, from combined acute exposures of benzene and 2-ethyltoluene.

31. The study only assessed pollution dispersion from single well pads. This potentially underestimates the risks faced by almost two-thirds of the roughly 240,000 Coloradoans living within 2000 ft of two or more well pads.

### **Recent Studies Suggest Proximity to Oil and Gas Development Is Associated with Adverse Health Outcomes.**

32. In addition to the threats to public health posed by exposure to HAPs and ozone, new studies document associations between proximity to nonconventional oil and gas development and human health effects. While these studies do not evaluate concentrations of specific air pollutants, they document health effects that are consistent with exposure to smog and hazardous air pollutants.

33. Air pollutants associated with oil and gas operations are known to cause serious health impacts in sensitive populations such as pregnant women, babies, and children. Studies have documented that living near natural gas wells is associated with lower birth weight babies<sup>41</sup> and preterm birth.<sup>42</sup> Other studies have found an association between oil and gas proximity and congenital heart defects in infants.<sup>43</sup> Congenital heart defects (CHDs) are the leading cause of

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<sup>41</sup> See Stacy, et al., *Perinatal Outcomes and Unconventional Natural Gas Operations in Southwest Pennsylvania*, PLoS ONE (June 3, 2015), available at <https://doi.org/10.1371/journal.pone.0126425>.

<sup>42</sup> Casey et al., *Unconventional Natural Gas Development and Birth Outcomes in Pennsylvania, USA*, *Epidemiology* (Mar. 2016), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4738074/>.

<sup>43</sup> McKenzie et. al., *Birth Outcomes and Maternal Residential Proximity to Natural Gas Development in Rural Colorado*, *Envtl. Health Perspectives* (Jan. 28, 2014) available at <https://ehp.niehs.nih.gov/1306722/>; McKenzie et al., *Congenital Heart Defects and Intensity of Oil and Gas Well Site Activities in Early Pregnancy*, *Environment International* (July 28, 2019), available at <https://www.sciencedirect.com/science/article/pii/S0160412019315429>.

death due to birth defects.<sup>44</sup> A 2014 Colorado study found that babies whose mothers had large numbers of natural gas wells within a 10-mile radius of their home had an increased risk of birth defects of the heart, compared to babies whose mothers had no wells within 10 miles of their home.<sup>45</sup> A 2019 follow-up study by the same research team fortified these results.<sup>46</sup> Perhaps most notably, a study of over 1.1 million births in Pennsylvania demonstrated evidence for negative health effects (including low birth weight) from in utero exposure to fracking sites within 3 kilometers of a mother's residence, with the largest health impacts seen for in utero exposure within 1 kilometer of oil and gas sites.<sup>47</sup> Another recent study of 2.9 million births in California also found that among rural populations living in proximity to higher production oil and gas development was associated with increased odds of having a low birth weight baby.<sup>48</sup>

34. Other studies also document correlations between proximity to oil and gas drilling and human health effects in otherwise healthy populations. This emerging body of scientific literature includes several new studies documenting negative human health impacts based on proximity to oil and gas wells. For example, a study from 2016 demonstrated that oil and gas well proximity was correlated with an increase in the likelihood of asthma exacerbations,

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<sup>44</sup> McKenzie et al., *Congenital Heart Defects and Intensity of Oil and Gas Well Site Activities in Early Pregnancy*, Environment International (July 28, 2019), available at <https://www.sciencedirect.com/science/article/pii/S0160412019315429>.

<sup>45</sup> McKenzie et. al., *Birth Outcomes and Maternal Residential Proximity to Natural Gas Development in Rural Colorado*, Env'tl. Health Perspectives (Jan. 28, 2014), available at <https://ehp.niehs.nih.gov/1306722/>.

<sup>46</sup> McKenzie et al., *Congenital Heart Defects and Intensity of Oil and Gas Well Site Activities in Early Pregnancy*, Environment International (July 28, 2019), available at <https://www.sciencedirect.com/science/article/pii/S0160412019315429>.

<sup>47</sup> Currie, Janet, et al., *Hydraulic Fracturing and Infant Health: New Evidence from Pennsylvania*, Science Advances, American Association for the Advancement of Science (Dec. 1, 2017), available at [advances.sciencemag.org/content/3/12/e1603021](https://advances.sciencemag.org/content/3/12/e1603021).

<sup>48</sup> Tran, Kathy V., et al. "Residential Proximity to Oil and Gas Development and Birth Outcomes in California: A Retrospective Cohort Study of 2006–2015 Births." Environmental Health Perspectives 128.6 (2020): 067001.



including mild, moderate, and severe asthma attacks.<sup>49</sup> A 2015 study documented increased hospitalization rates in counties with a high density of oil and gas wells.<sup>50</sup> Similarly, other studies, including a 2017 study, have demonstrated an increase in the reporting of nasal, sinus, and migraine headaches, and fatigue symptoms in areas with high volumes of oil and gas drilling.<sup>51</sup>

35. A 2018 study in Colorado found that communities living in close proximity to oil and gas activity had higher measured exposures to HAPs and face increased risks to their health, including a heightened risk of cancer.<sup>52</sup> The study found that the lifetime cancer risk was 8.3 per 10,000 people for populations living within approximately 500 feet of oil and gas activity, above EPA's allowable risk. The study also found elevated levels of acute and chronic blood system and developmental risks, and acute nervous system risks for the same population. Benzene exposures contributed to 80-95% of risks across the different health effects.

36. While this literature is developing, it substantiates that people living in close proximity to oil and gas development are exposed to air pollution from these sources and experience acute, adverse, and often near-term health impacts.

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<sup>49</sup> Rasmussen et al, *Association between Unconventional Natural Gas Development in the Marcellus Shale and Asthma Exacerbations*, 176 J. Am. Med. Assn. Internal Med. 1334-43 (Sept. 2016), available at <https://www.ncbi.nlm.nih.gov/pubmed/27428612>.

<sup>50</sup> Jemielita et al., *Unconventional Gas and Oil Drilling Is Associated with Increased Hospital Utilization Rates*, PLoS ONE (July 15, 2015), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4503720/>.

<sup>51</sup> See Tustin et al., *Associations between Unconventional Natural Gas Development and Nasal and Sinus, Migraine Headache, and Fatigue Symptoms in Pennsylvania*, 125 ENV. HEALTH PERSPECTIVES 189 (Feb. 2017), available at <https://ehp.niehs.nih.gov/EHP281/>.

<sup>52</sup> Lisa McKenzie et al., *Ambient Non-Methane Hydrocarbon Levels Along Colorado's Northern Front Range: Acute and Chronic Health Risks*, forthcoming in *Env'tl Sci. & Tech.* (Mar. 27, 2018), available at <https://pubs.acs.org/doi/10.1021/acs.est.7b05983>.

### **Conclusion**

37. As long as EPA fails to issue Methane Guidelines for existing sources in the oil and gas sector, these sources will continue to emit harmful methane, VOC and HAP pollution that would otherwise be abated. Individuals exposed to these emissions and the secondary pollutants that form from them face a higher risk of adverse health effects, including acute and immediate respiratory ailments like asthma, and enhanced risk of deleterious health effects associated with toxic pollution exposures, such as neurotoxicity, cancer or blood disorders.

I declare that the foregoing is true and correct.



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Ananya Roy

July 2, 2020

I declare that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'T. Thompson', written over a horizontal line.

Tammy Thompson

July 2, 2020

Curriculum Vitae Ananya Roy Sc.D.  
March 2019

**ANANYA ROY**

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**EDUCATION**

2008 Doctor of Science (Sc.D.)  
Environmental Health (Exposure, Epidemiology and Risk)  
Harvard University, Boston, MA, USA

2003 Master of Science (M.Sc.) Pharmacology  
All India Institute of Medical Sciences (AIIMS), New Delhi, India

2001 Bachelor of Science (B.Sc.) Human Biology  
All India Institute of Medical Sciences (AIIMS), New Delhi, India

**EXPERIENCE**

**Non Profit:**

2016- Present Senior Health Scientist, Environmental Defense Fund, Washington DC

**Academic:**

2012-2013 Associate Research Scientist, Department of Chronic Disease Epidemiology, Yale School of Public Health, New Haven, CT

2009-2012 Research Associate II, Environmental and Occupational Health Sciences Institute, University of Medicine and Dentistry (now Rutgers University) New Jersey, Piscataway, NJ

2008 - 2009 Post-doctoral Research Fellow, Department of Environmental Health Sciences, University of Michigan School of Public Health, Ann Arbor, MI

**HONORS AND AWARDS**

2009 Institute of Health Metrics Travel Grant, University of Washington, Seattle, WA,

2007 Best research award, Boston India symposium

2005- 2007 Cabot Scholarship, Harvard School of Public Health, Boston, MA

2004- 2005 Edmund J. Curley Award, Harvard School of Public Health, Boston, MA

2004- 2005 Mahindra Education Trust Scholarship, Harvard School of Public Health, Boston

**MAJOR RESEARCH INTERESTS:**

1. Air pollution epidemiology
2. Health impact assessments
3. Global environmental health
4. Heavy metal exposures and child development

**Current Research:**

EDF

2019-Present Co PI with Prof Oliver Gao, Cornell University. Atkinson Center- EDF postdoctoral fellow. Advanced Fine Scale Intra-Urban Sustainable Transportation - Climate - Air Quality - Health Integrated Assessment Tool for Future Cities.

2019-Present Co PI with Prof Susan Anenberg, GW Milken School of Public Health. High Resolution Assessment of Distribution of Air Pollution-Related Health Impacts in Houston and Bay Area

2016- 2019 Co PI with Dr. Stephen Van Den Eeden, Kaiser Permanente DOR, Novel air pollution mapping and health disparities in Oakland

2018-Present Co-PI with Prof. Sarav Arunachalam, UNC. Assessing air quality and Health impacts of Ozone and PM<sub>2.5</sub> attributable to Oil and Gas emissions in the United States

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### External funding:

2019-2020 Overlook Foundation. Co-I with Dr. Jonathan Buonocore, Harvard Chan School of Public Health. Tracking oil and gas pollution and understanding health benefits of reducing methane

## **PUBLICATIONS**

### **Peer-Reviewed Journals:**

1. SE Alexeeff, A Roy, J Shan, X Liu, K Messier, J Apte, C Portier, S Sidney, SK. Van Den Eeden. High-Resolution Mapping of Traffic Related Air Pollution with Google Street View Cars and Incidence of Cardiovascular Events within Neighborhoods in Oakland, CA. *Environ Health*. 2018 May 15;17(1):38
2. Messier K, Chambliss S, Gani S, Alvarez R, Brauer M, Choi J, Hamburg S, Kerckhoffs J, LaFranchi B, Lunden M, Marshall J, Portier C, Roy A, Szpiro A, Vermeulen, R, Apte J. Mapping air pollution with Google Street View cars: Efficient approaches with mobile monitoring and land use regression. *Env Sci & Tech* 2018 Oct 24;52(21):12563-72.
3. Downward GS, van Nunen EJ, Kerckhoffs J, Vineis P, Brunekreef B, Boer JM, Messier KP, Roy A, Verschuren WM, van der Schouw YT, Sluijs I. Long-Term Exposure to Ultrafine Particles and Incidence of Cardiovascular and Cerebrovascular Disease in a Prospective Study of a Dutch Cohort. *Environmental health perspectives*. 2018 Dec 19;126(12):127007.
4. Roy A, Gong J, Zhang J, Kipen HM, Rich DQ, Zhu T, Huang W, Hu M, Wang G, Wang Y, Ping Zhu, Lu S, Ohman-Strickland P, Diehl SR, Thomas D, Eckel SP. The cardiopulmonary effects of ambient air pollution and mechanistic pathways: A comparative hierarchical pathway analysis. *PLOS One* 2014 Dec 12;9(12): e114913.
5. Lim SS, ....., Roy A, ....., Lopez AD, Murray CJ, Ezzati. M. A comparative risk assessment of burden of disease and injury attributable to 67 risk factors and risk factor clusters in 21 regions, 1990—2010: a systematic analysis for the Global Burden of Disease Study 2010. *Lancet*. 2012 Dec 15;380(9859):2224-60
6. Roy A, Hi W, Wei F, Korn L, Chapman RS, Zhang J. Ambient particulate matter and lung function growth in children living in four Chinese cities. *Epidemiology*, 2012; 23(3):464-472
7. Roy A, Chapman RS, Hu W, Wei F, Liu X, Zhang J, Indoor air pollution and lung function growth among children in four Chinese cities. *Indoor Air*, 2012; 22 (1): 3–11
8. Abid Z, Roy A, Herbstman JB, Ettinger AS. Urinary polycyclic aromatic hydrocarbon metabolites and attention/deficit hyperactivity disorder, learning disability, and special education in U.S. children aged 6 to 15. *J Environ Public Health*. 2014;2014: 628508. doi: 10.1155/2014/628508. Epub 2014 Jan 30.
9. Richardson JR, Roy A, Shalat SL, von Stein RT, Hossain MM, Buckley B, Gearing M, Levey AI, German DC. Elevated serum pesticide levels and risk for Alzheimer disease. *JAMA Neurol*. 2014 Mar;71(3):284-90. doi: 10.1001/jamaneurol.2013.6030.
10. Ettinger AS, Roy A, Amarasiriwardena CJ, Smith D, Lupoli N, Mercado-García A, Lamadrid-Figueroa H, Tellez-Rojo MM, Hu H, Hernández-Avila M. Maternal blood, plasma, and breast milk lead: lactational transfer and contribution to infant exposure. *Environ Health Perspect*. 2014 Jan;122(1):87-92. doi: 10.1289/ehp.1307187. Epub 2013 Oct 30.
11. Roy A, Ettinger AS, Hu H, Bellinger D, Schwartz J, Modali R, Wright RO, Palaniappan K, Balakrishnan K. Effect modification by transferrin C2 polymorphism on lead exposure, hemoglobin levels, and IQ. *Neurotoxicology*. 2013 Sep;38: 17-22. doi: 10.1016/j.neuro.2013.05.005. Epub 2013 May 31.
12. Richardson, JR, Roy A, Shalat SL, Buckley B, Winnik B, Gearing M, Levey AI, Factor SA, O'Suilleabhain P, German DC  $\beta$ -Hexachlorocyclohexane levels in serum and risk of Parkinson's disease. *Neurotoxicology*, 2011 Oct; 32 (5) 640-645.
13. Palaniappan K, Roy A, Balakrishnan K, Krishnan L, Mukherjee B, Hu H, Bellinger D. Lead exposure and visuo-motor abilities in children from Chennai, India. *Neurotoxicology* 2011 Apr 8;32(4):465-470.

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14. Roy A, Bellinger DC, Hu H, Modali R, Schwartz J, Wright RO, Ettinger A, Palaniapan K, Balakrishnan K. Hemoglobin, lead exposure, and intelligence quotient: effect modification by dopamine receptor D2 TaqIA polymorphism. *Environmental Health Perspectives* 2011 Jan;119(1):144-9.
15. Roy A, Hu H, Bellinger D, Schwartz J, Wright RO, Palaniappan K, Balakrishnan K. Predictors of blood lead among 3-7-year-old children in Chennai, India. *International Journal of Occupational Environmental Health*. 2009 Oct-Dec;15(4):351-9.
16. Roy A, Bellinger DC, Hu H, Schwartz J, Ettinger AS, Wright RO, Bouchard M, Palaniappan K, Balakrishnan K. Lead exposure and behavior among young children in Chennai, India. *Environment Health Perspectives*. 2009 Oct; 117(10):1607-11
17. Kaushik M, Roy A, Bang AA, Mahal A. Quality of medical training and emigration of physicians from India. *BioMed Central Health Services Research* 2008; 8:279.
18. Roy A, Sood S, Dinda AK, Das TK, Maulik SK. Oxidative stress and histopathological changes in the heart following oral lindane (gamma hexachlorohexane) administration in rats. *Med Sci Monit* 2005; 11(9):BR325-329.

#### Manuscripts Under Preparation:

1. A Hierarchical Spatio-Temporal Model for the 100×100 Black Carbon Network in West Oakland, California. Travis Hee Wai, Joshua Apte, Thomas Kirchstetter, Ananya Roy, Christopher Portier, Ramon Alvarez, Adam Szpiro
2. Association Between Long-term Air Pollution Exposure and Direct Health Care Costs in Northern California. Ananya Roy, Stacey E. Alexeeff, Jun Shan, G. Thomas Ray, Charles Q. Quesenberry, Joshua Apte, Chris Portier, Stephen K. Van Den Eeden
3. Mortality Risk from PM2.5 Among the Elderly: A Comparison of Modeling Approaches and Policy Applications. Beia Spiller, Jeremy Proville, Ananya Roy, Nicholas Z. Muller

#### Reports:

1. Human Health Effects of Ozone: The State of Evidence Since EPA's Last Integrated Science Assessment. Stephanie M. Holm, John R. Balmes, Ananya Roy. Environmental Defense Fund. September 2018
2. The Lancet Commission on pollution and health. *The Lancet*. Oct 19, 2017.
3. 10 Policies to Prevent and Respond to Childhood Lead Exposure: An assessment of the risks communities face and key federal, state, and local solutions. Pew Charitable Trust. Aug 30, 2017

#### Conference Abstracts:

1. Palaniappan K, Balakrishnan K, Krishnan L, Bellinger D, Roy A, Wright R O, Hu H. Lead exposure, IQ, and neurobehavioral changes in children in Chennai, India. *Epidemiology* 2007;18(5): S42 (Abstract).
2. Roy A, Palaniappan K, Hu H, Wright R, Balakrishnan K. Predictors of blood lead in 3-7 year old children in Chennai, India. *Epidemiology* 2007; 18(5): S175 (Abstract).
3. Roy A, Palaniappan K, Hu H, Bellinger D, Wright R, Balakrishnan K. Current blood lead is associated with decline in stature among children in Chennai, India. *Epidemiology* 2007;18(5): S181 (Abstract).
4. Roy A. Lead Associated Deficits in Executive Function and Behavior in 3-7 Year Old Children in Chennai, India *Epidemiology* 2008;19(6): S306 (Abstract).
5. Roy A, Ettinger A, Hu H, Hernandez-Avila M. Dietary calcium as a modifier of the relationship between lead burden and blood pressure among postpartum women. *Epidemiology* 2008;17(6): S123 (Abstract).
6. Roy A, Bellinger DC, Hu H, Modali R, Schwartz J, Wright RO, Ettinger A, Palaniapan K, Balakrishnan K. Hemoglobin, lead exposure, and intelligence quotient: effect modification by dopamine receptor D2 TaqIA polymorphism. *Epidemiology* 2009;20(6): S77-78 (Abstract).
7. Thomas D, Roy A, Hu H, Mukherjee B, Modali R, Palaniappan K, Balakrishnan K IQ and Blood Lead Levels: Effect Modification by ALAD Amongst Children in Chennai, India. *Epidemiology* 2011 Jan; 22(1): S135-S136 (Abstract).
8. Roy A, Hu W, Leo K, Chapman RS, Wei F, Zhang J, Ambient air pollution and lung function growth among Ambient Air Pollution and Lung Function Among Children in 4 Cities in China (1993–1996) *Epidemiology* 2011 Jan; 22(1): S192 (Abstract).

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9. M H Harris, B Beveridge, M Gordon, F Uennatornwarangoon, G Zayas del Rio, A Roy. Street-Level Air Pollution, Health Disparities, and Advocacy. Environmental Health Perspectives. (<https://ehp.niehs.nih.gov/doi/abs/10.1289/isesisee.2018.S01.03.17>)
10. A Roy, S Alexeeff, J Shan, X Liu, K Messier, J S Apte, C Portier, S Sidney, S Van Den Eeden Google Street View Car Measurements of Traffic Related Air Pollution within Neighborhoods and Stroke in a Population with Preexisting Cardiovascular Disease. Environmental Health Perspectives. (<https://ehp.niehs.nih.gov/doi/10.1289/isesisee.2018.P03.1670>)
11. K Messier, S Chambliss, A Roy, J Marshall, M Brauer, A Szpiro, C Portier, J Kerckhoffs, R Vermeulen, J S Apte. Mapping Air Pollution with Google Street View Cars: Towards Efficient Mobile Monitoring. Environmental Health Perspectives. (<https://ehp.niehs.nih.gov/doi/abs/10.1289/isesisee.2018.S02.03.10>)
12. Saravanan Arunachalam, Srinivas Reka, Dongmei Yang, David Lyon, Hillary Hull, Ryan O Connell, Ananya Roy, Beth Trask, Jonathan Buonocore Air Quality Impacts of Oil and Gas Emissions in the United States, CMAS 2019
13. Veronica Southerland, Susan Anenberg, Jeol Schwartz, Josh Apte, Maria Harris, Ananya Roy. Leveraging mobile monitoring and satellite remote sensing to estimate the health burden of air pollution on the hyper-local scale: case study for the California Bay Area. AGU 2019

### **SPEAKING ENGAGEMENTS**

#### **Invited presentations, seminars, webinars, stakeholder briefings**

- Panelist. Clean Air is Our Natural Capital, Nesta, London. February 2019. “International perspectives on air pollution and health”
- Invited speaker. Envirome Institute, U of Louisville, TN. November 2018 “Hyperlocal Air Pollution & Health in Cities: Harnessing Sensors and EMR to Drive Action”
- Presenter. Chinese Ministry of Environment and Ecology, Department of Enforcement Delegation to USA. Nov 2018 “Hyperlocal Air Pollution and Health: Data for Decision Making”
- Presenter. AB617 stakeholder consultation. April 2018 “High resolution air pollution mapping and health impacts in West Oakland”
- Presenter. EDF public Webinar. May 2018.” Street-Level Air Pollution & Cardiovascular Risk in Oakland, CA Application of Sensors & Electronic Medical Records to Understand Intra-Urban Environmental Health Disparities”
- Presenter. BAAQMD stakeholder briefing May 2018.” Street-Level Air Pollution & Cardiovascular Risk in Oakland, CA. Application of Sensors & Electronic Medical Records to Understand Intra-Urban Environmental Health Disparities”
- Presenter. Asian Health Network. Stakeholder briefing. May 2018. “Air pollution and Cardiovascular health in Oakland, CA”
- Presenter. Alameda County Public Health Department. Stakeholder briefing. May 2018. “Air pollution and Cardiovascular health in Oakland, CA”
- Invited Speaker. Workshop on the Global Burden of Disease-Pollution and Health Initiative. March 2018. “India Case Study: Information gaps in addressing air pollution”.
- Presenter. China Ministry of Environment Ecology January 2018. Environmental Health Training. Guangzhou, China. “High resolution air pollution mapping and health impacts”
- Presenter. China Ministry of Environment Ecology January 2018. Environmental Health Training. Guangzhou, China. “Health based decision making for air pollution control”
- Presenter Environment Heath Seminar, University of Michigan School of Public Health, MI; February 2009. “Lead exposure and health effects in 3-7-year-old children in Chennai, India.”
- Presenter. University of Washington School of Public Health, Seattle, WA; January 2009. “Global Burden of disease due to lead exposure.”
- Presenter. Environment Heath Seminar, Harvard University School of Public Health, Boston, MA; October 2007. “Current lead exposure and neurobehavior in 3-7 year-old children in Chennai India.”



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### **Conference oral presentations**

- Roy A, Harris M (Symposium chairs) High Resolution Air Pollution Mapping: Translating Data to Action. International Society of Environment Epidemiology (ISEE), Ottawa, CA. 2018
- Roy A, Chapman RS, Hu W, Wei F, Liu X, Zhang J. Indoor air pollution and lung function growth among children in four Chinese cities. Indoor Air 2011 Conference, Austin, TX; June 5-11, 2011.
- Roy A, Bellinger DC, Hu H, Modali R, Schwartz J, Wright RO, Ettinger A, Palaniapan K, Balakrishnan K. Hemoglobin, lead exposure, and intelligence quotient: effect modification by dopamine receptor D2 TaqIA polymorphism. International Society of Environment Epidemiology 2009 Conference, Dublin, Ireland; August 25-29, 2009.
- Roy A. Lead Associated Deficits in Executive Function and Behavior in 3-7 Year Old Children in Chennai, India International Society of Environment Epidemiology 2008 Conference, Pasadena, CA; October 12-16, 2008.
- Roy A, Palaniappan K, Hu H, Bellinger D, Wright R, Balakrishnan K. Current blood lead is associated with decline in stature among children in Chennai, India. Oral Presentation, International Society of Environment Epidemiology 2007 Conference, Mexico City, Mexico; 5th-9th, September 2007
- Roy A, Ettinger A, Hu H, Hernandez-Avila M. Dietary calcium as a modifier of the relationship between lead burden and blood pressure among postpartum women. Poster Presentation International Society of Environment Epidemiology 2006 Conference, Paris, France; 3-5th, September 2006.

### **PROFESSIONAL SERVICE**

#### **Input to regulatory process**

Declaration on health impacts of air pollution from diesel trucks. (In support of EDF legislative actions to close the loophole on glider trucks.)  
Submitted to EPA comment letter on Integrated Science Assessment for Particulate Matter

#### **Memberships**

International Society of Environment Epidemiology (ISEE) 2007-present  
International Society of Indoor Air Quality and Climate (ISIAQ) 2011-2014

#### **Peer review service**

Epidemiology  
Journal of Exposure Science and Environmental Epidemiology  
Social Science and Medicine  
Indoor Air  
International Journal for Occupational and Environmental Health  
Indian Journal of Pediatrics  
Egyptian Journal of Forensic Medicine  
Science of the Total Environment

### **TEACHING**

2010-2011 Lecturer, Neuroepidemiology of Lead. Neural Injury and Repair Course, Ernest Mario School of Pharmacy at Rutgers, The State University of New Jersey, Piscataway, NJ

2011 Teaching faculty, Environmental Health, Sri Ramachandra University, India

2010 Invited Lecturer, Environmental Health, Yale University, New Haven, CT

2007 Head Teaching Assistant, Principles of Environmental Health, Harvard School of Public Health, Boston, MA

2006 Teaching Assistant, Human Health and Global Environmental Change, Harvard Medical School, Boston, MA

2001-2003 Lecturer, Masters-level Practical Pharmacology, All India Institute of Medical Sciences (AIIMS), New Delhi, India

Exhibit B

**TAMMY M. THOMPSON**

(303)447-7226

tthompson@edf.org

**Education**

Ph.D. Chemical Engineering, University of Texas at Austin, December 2008

- Thesis title: *Evaluating the Design of Emissions Trading Programs Using Air Quality Models*, Advisor: Prof. David T. Allen

BS Chemical Engineering, University of Florida, December 2002 with Honors

- 4.0/4.0 GPA

**Professional Experience**

**Senior Air Quality Scientist**, Environmental Defense Fund, Feb. 2019 - Present

- Develop and evaluate modeling tools to identify contribution of sources to air pollution at a hyper-local scale
- Design and oversee modeling studies with a focus on the human health impacts of oil and gas production and transportation

**Environmental Policy Analyst**, Congressional Research Service Library of Congress, July 2018 – Feb. 2019

- Respond to Congressional inquiries on topics related to air pollution and climate
- Developed reports on background ozone, methane, and contributions of LNG to air pollution

**Science & Technology Policy Fellow**, American Association for the Advancement of Science, Sept. 2016 – July 2018

- Published a review of global climate models in context of updating estimates of the Social Cost of Carbon
- Lead a team of EPA researchers to evaluate opportunities to reduce High Ozone Days in the Northeast U.S. under the current policy framework
- Working with Federal Land Managers to evaluate the state of science of emissions inventory estimations for NEPA
- Authored a white paper on the state of the science of reactive nitrogen source apportionment
- Lead a speaker series as Co-chair of AAAS Energy/Climate Affinity Group
- Co-convened a symposium on Ecosystem Services: From Concept to Policy

**Research Scientist II**, Colorado State University, Cooperative Institute for Research in the Atmosphere, May 2013 – Aug. 2016

- Worked with scientists from academia, and local, state and federal agencies to identify strategies to improve air quality in and around our National Parks
- Improved the representation of the nitrogen cycle in regional chemical transport modeling
- Investigated the impacts of energy development activity and increased availability of natural gas on air quality
- Evaluated the sensitivity of chemical transport model performance to meteorological modeling in complex terrain

**Post Doctoral Associate**, Massachusetts Institute of Technology, Joint Program for the Science and Policy of Global Change, Sept. 2010 – April 2013

- Developed integrated assessment capabilities for/ and conducted evaluations of potential human health co-benefits associated with air quality changes resulting from global change and climate policy
- Serve as the in house regional air quality and regional modeling expert, including mentoring grad students on modeling tools
- Evaluated the impact of model resolution on the uncertainty associated with human health impacts from changes in ozone and particulate matter

**Post Doctoral Associate**, University of Texas at Austin, Center for Energy and Environmental Resources, Jan. 2009 – Sept. 2010

- Evaluated impacts of transportation modeling assumptions and Texas on-road mobile source emission scenarios
- Worked with Austin Industry Leaders to design and implement policies to reduce local ozone
- Evaluated Smart Energy Grid Ideas for air quality impacts as part of Austin's Pecan Street Project

## Exhibit B

**Graduate Researcher**, University of Texas at Austin, Center for Energy and Environmental Resources, Sept. 2003 – Dec. 2008

- Integrated Air Quality and Economic models of Electricity Generating Units for the Northeast United States to maximize benefits obtained from regional cap and trade program
- Modeled Air Quality Impacts of Plug-In Hybrid Electric Vehicles using existing capacity in the Northeast and Texas
- Proposed policy changes to improve the viability of VOC emissions trading markets in Houston. Recommendations are based on analysis of historical emissions and air quality modeling done to test the impacts of temporal and spatial variability of emissions on the 8hr ozone attainment demonstration

**Air Quality Team Leader**, United States Agency International Development, Lima, Peru, Aug. 2006 – Feb. 2007

- Designed and developed an Air Quality model to estimate the air quality benefits of a switch to Natural Gas from traditional fuels
- Traveled to Lima to present findings and train Peruvian Environmental workers on the model

### Independent Consultant

- Earth Justice: Served as an Expert Witness speaking to atmospheric chemistry and meteorological conditions that, along with oil and gas emissions, lead to high ozone events in the Colorado Front Range, Oct. 2017
- Clean Air Task Force: Evaluated proposed methane controls for regional air quality and human health co-benefits, Nov. 2015 – Aug. 2016
- Environmental Defense Fund: Served as an Expert Witness reporting and discussing the potential air quality impacts of statewide controls on hydrocarbon emissions from Oil and Gas Production in Colorado, Nov. 2013 – Feb. 2014
- National Parks Conservation Association: Evaluated the potential impacts on visibility in Class 1 Areas in the Southwest of emissions from select point source facilities in Texas, Feb. 2012
- Sierra Club: Evaluated the potential air quality impacts of a proposed and existing emissions point sources in Texas, March – Feb. 2012
- Perimeter Counties Industrial Group: Determined the extent of the contributions of emissions from both Harris county and the perimeter counties outside Harris to the ozone non-attainment status of the South-East Texas area, 2005-2006

**Intern**, United States Environmental Protection Agency Chemical Engineering Branch, Washington DC, June 2004 – Dec. 2004

- Determined the environmental and worker safety of new to the market chemicals during the production, transport, storage and use of the chemical's life cycle, using EPA developed software, ChemSTEER, as part of the Pre Manufacture Notice program (PMN)
- Helped to develop a Generic Scenario for a Refinery, used to estimate the type, location and quantity of emissions at a Refinery

Tool set includes: CAMx and CMAQ air quality models, WRF and Hysplit meteorological models, MOVES2010 and MOBILE6 on-road emissions models, Global climate models, EPS3 and SMOKE emissions preprocessing systems, GIS, python, R, fortran, oracle, perl and unix.

## Service and Memberships

Appointed to the Denver Metropolitan Area Regional Air Quality Council by Governor John Hickenlooper in April 2014

Member: American Geophysical Union, American Meteorological Society

Reviewer: Atmospheric Environment, Energy Policy, Environmental Science & Technology, Atmospheric Chemistry & Physics Technical Committee Member, Three State Air Quality Study, January 2014 – Aug. 2016

Grant Review Panel Member, EPA SBIR, November 2013

## Publications (Peer Reviewed)

1. **Thompson, T.M.** "Modeling the Climate and Carbon Systems to Estimate the Social Cost of Carbon" Accepted for publication at Wiley Interdisciplinary Reviews: Climate Change.
2. Zhang, R., **Thompson, T.M.**, Barna, M.G., Hand, J.L., McMurray, J.A., Bell, M.D., Malm, W.C., Schichtel, B.A. "Source regions contributing to excess reactive nitrogen deposition in the Greater Yellowstone Area (GYA) of the United States", *Atmospheric Chemistry and Physics Discussions* 1–38, 2018.
3. **Thompson, T.M.**, Shepherd, D., Stacy, A., Barna, M.G., Schichtel, B.A. "Modeling to Evaluate Contribution of Oil and Gas Emissions to Air Pollution" *Journal of the Air & Waste Management Association*, 67, 445–461, 2017.

## Exhibit B

4. Li, Y., **Thompson, T.M.**, Van Damme, M., Chen, X., Benedict, K.B., Shao, Y., Day, D., Boris, A., Sullivan, A.P., Ham, J., Whitburn, S., Clarisse, L., Coheur, P.-F., and Collett Jr., J.L. "Temporal and spatial variability of ammonia in urban and agricultural regions of northern Colorado, United States", *Atmospheric Chemistry and Physics*, 17, 6197–6213, 2017.
5. Saari, R.K., **Thompson, T.M.**, Selin, N.E. "Human Health and Economic Impacts of Ozone Reductions by Income Group" *Environmental Science & Technology*, 51, 1953–1961, 2017.
6. **Thompson, T.M.**, Rausch, S., Saari, R.K., Selin, N.E. "Air quality co-benefits of subnational carbon policies" *Journal of the Air & Waste Management Association*, 66, 988–1002, 2016.
7. Malm W.C., Rodriguez M.A., Schichtel B.A., Gebhart K.A., **Thompson T.M.**, Barna M.G., Benedict K.B., Carrico C.M., Collett Jr. J.L. "A hybrid modeling approach for estimating reactive nitrogen deposition in Rocky Mountain National Park", *Atmospheric Environment* 126, 258–273, 2016.
8. **Thompson T.M.**, Rodriguez M.A., Barna M.G., Gebhart K., Hand J., Day D., Malm, W., Benedict K., Collett Jr. J.L., and Schichtel B. "Atmospheric Modeling of Reduced Nitrogen Deposition Source Apportionment at Rocky Mountain National Park", *Journal of Geophysical Research: Atmospheres*, 120, 2015.
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10. **Thompson T.M.**, Rausch S., Saari R.K., Selin N.E. "Air Quality Co-Benefits of US Carbon Policies: A Systems Approach to Evaluating Policy Outcomes and Uncertainties", *Nature Climate Change*, 4, 917-923. 2014.
11. **Thompson T.M.**, Saari, R.K., Selin, N.E. "Air Quality Resolution for Health Impacts Assessment: Influence of Regional Characteristics", *Atmospheric Chemistry & Physics*, 14, 969-978, 2014.
12. **Thompson T. M.** and Selin N. E. "Influence of air quality model resolution on uncertainty associated with health impacts", *Atmospheric Chemistry & Physics*, 12(20), 9753–9762, 2012.
13. Sun L., Webster M., McGaughey G., McDonald-Buller E.C., **Thompson T.M.**, Prinn R., Ellerman A.D. and Allen D.T. "Flexible NO<sub>x</sub> Abatement from Power Plants in the Eastern United States", *Environmental Science & Technology*, 46 (10): 5607–5615, 2012.
14. **Thompson T.M.**, King C.W., Allen D.T., Webber M.E. "Air quality impacts of plug-in hybrid electric vehicles in Texas: evaluating three battery charging scenarios", *Environmental Research Letters*, 6, 024004, 2011.
15. **Thompson T.M.**, Kimura Y., Durrenberger C., Webb A., Tejela Matias A.I., and Allen D.T.: "Estimates of the Air Quality Benefits using Natural Gas in Industrial and Transportation Applications in Lima, Peru", *Clean Technologies and Environmental Policy*. January 2009.
16. **Thompson, T.M.**, Webber M.E., Allen D.T. "Air Quality Impacts of Using Overnight Electricity Generation to Charge PHEVs for Daytime Use", *Environmental Research Letters*. December 2008.
17. Wang L., **Thompson T.**, McDonald-Buller E.C., Webb A., and Allen D.T. "Photochemical Modeling of Emissions Trading of Highly Reactive Volatile Organic Compounds (HRVOCs) in Houston, Texas. Part 1. Potential for Ozone Hot Spot Formation and Reactivity Based Trading", *Environmental Science & Technology*, 41, 2095-2102, 2007.
18. Wang L., **Thompson T.**, McDonald-Buller E.C., Webb A., and Allen D.T. "Photochemical Modeling of Emissions Trading of Highly Reactive Volatile Organic Compounds (HRVOCs) in Houston, Texas. Part 2. Incorporation of Chlorine Emissions", *Environmental Science & Technology*, 41, 2102-2107, 2007.

### Selected Presentations/Posters

1. **Thompson T.M.**, Barna M.G., Schichtel B.A. "Modeling Reduced Nitrogen in the Rockies", Poster at the American Geophysical Union conference San Francisco, December, 2015.
2. **Thompson T.M.**, Barna M.G., Schichtel B.A., Gebhart, K. "Sensitivity of Source Apportionment in Rocky Mountain National Park to Meteorological Modeling", Speaker at the Community Modeling and Analysis System (CMAS) Conference, Chapel Hill, NC, October 6, 2015.
3. **Thompson T.M.**, Barna M.G., Schichtel B.A. "2011 Model Performance of Reduced Nitrogen in the Grand Tetons: CAMx vs CMAQ", Poster at the Community Modeling and Analysis System Conference, Chapel Hill, NC, October 6, 2015.
4. **Thompson T.M.** "Protecting our National Parks: Air Quality Challenges", Invited Speaker at the Joint Program on the Science and Policy of Global Change, Boston, MA, February 20, 2015.
5. **Thompson T.M.**, Barna M.G., Schichtel B.A. "Nitrogen Deposition and Critical Loads in our National Parks: Contribution of Oil and Gas Production", Speaker at the American Meteorological Society Conference, Phoenix, AZ, January 9, 2015.
6. **Thompson T.M.**, Barna M.G., Schichtel B.A. "Modeled Contributions of Oil and Gas Production to Nitrogen Deposition in the Western U.S.", Speaker at the National Atmospheric Deposition Program Conference, Indianapolis, IN, October, 23, 2014.

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7. **Thompson T.M.** “A Systems Approach to Evaluating Air Quality Co-benefits of Climate Policy”, Invited speaker at the Joint Program on the Science and Policy of global Change Forum, Miami, FL, January 11, 2014.
8. **Thompson T.M.**, Rausch S., Saari R.K., Selin N.E.: “Air quality co-benefits of a carbon policy: Regional implementation”, Speaker at the American Geophysical Union Annual Meeting, San Francisco, December 9-13, 2013.
9. **Thompson T.M.**, Rodriguez M., Barna M.G., Gebhart K.A., Malm W.C., Schichtel B.A.: “Source apportionment of ammonia at Rocky Mountain National Park”, Poster at Hemispheric Transport of Air Pollutants (H-TAP) Meeting, San Francisco, December 5-6, 2013.
10. **Thompson T.M.**, Barna M.G., Gebhart K.A., Malm W.C., and Schichtel B.: “Investigating the source of discrepancy in the diurnal profiles at Rocky Mountain National Park: Modeled versus Measured Ammonia”, Poster presented at Community Modeling and Analysis System Conference, Chapel Hill, NC, 28 October 2013.
11. **Thompson T.M.**, Selin N.E.: “Evaluating Energy Policy: Quantifying Air Pollution and Health Co-Benefits”, Poster at American Geophysical Union Science and Policy Conference, Washington DC, 2 May 2012.
12. **Thompson T.M.**, Selin N.E.: “Influence of Model Resolution on Uncertainty Associated with Human Health, Part II.” Speaker at Community Modeling and Analysis System Conference, Chapel Hill, NC, 16 October 2012.
13. **Thompson T.M.**, Rausch S., Selin N.E.: “Air Quality Impacts of a Clean Energy Standard on Major U.S. Cities”, Poster at American Geophysical Union Conference, San Francisco, CA, 7 December 2011.
14. **Thompson T.M.**, Rausch S., Selin N.E.: “Influence of Air Quality Model Resolution on Uncertainty Associated with Health Impacts”, Poster at World Climate Research Program Conference, Denver, CO, 26 October, 2011.
15. **Thompson T.M.**, Webber M., Allen D.T.: “Air Quality Impacts of Using Electricity Generation to Charge PHEVs for Daytime Use”. Speaker at the 2010 AWMA Conference in Calgary, AB.
16. **Thompson T.M.**, Wang L., Webb A., McDonald-Buller E.C. and Allen D.T.: “Photochemical Modeling of the Air Quality Impacts of an Emissions Trading Program for Highly Reactive Volatile Organic Compounds (HRVOCs) in Texas.” Speaker at the 2006 AWMA Conference in New Orleans, LA.

**Selected Other Publications**

1. **Thompson T.M.**, Shepherd D., Stacy A., Schichtel, B.A. “Modeling to Evaluate Contribution of Oil and Gas Emissions to Air Pollution”, CIRA Report, ISSN No. 0737-5352-89, June 2016.
2. **Thompson T.M.**, Allen D.T. “Lehigh Cement Hourly Impact Analysis” Report Prepared for Lehigh Cement and Capital Area Council of Governments, July 2010.
3. **Thompson T.M.**, McGaughey G., McDonald-Buller E.C. Allen, D.T. “Assessing the Contribution to Austin Area Ozone Concentrations in Austin, Texas from Twelve Point Sources using Anthropogenic Precursor Culpability Assessment (APCA). Technical Report for Austin’s Big Push Initiative. December 2009.
4. **Thompson T.M.** and Allen D.T. “Dynamic Responses to Management of Ozone Formation”. Final Report submitted to Austin Energy, May 2009.
5. Benavides M., **Thompson T.M.**, Sullivan D., McDonald-Buller E.C. and Yarwood, G. “Characterization of Fine Particulate Matter in the Texas Aerosol Research and Inhalation Epidemiology Study (Texas ARIES)” Submitted to The Texas Air Research Center. August 2008.