The Honorable Tristan Brown
Deputy Administrator
Pipeline & Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

RE: Pipeline Safety: Information Collection Activities: Mitigation of Ruptures on Onshore Gas Transmission and Gathering, Hazardous Liquid, and Carbon Dioxide Pipeline Segments Using Rupture-Mitigation Valves or Alternative Equivalent Technologies and Blending of Hydrogen Gas and Natural Gas Within Gas Pipelines, Docket No. PHMSA-2022-0085

The below health organizations support the swift enactment of the information collection that the Pipeline and Hazardous Materials Safety Administration (PHMSA) has proposed. Government oversight of hydrogen blending and the pipelines used for transport is overdue. Industry pushback to extend this comment period is a tactic to stall progress; given the severity of the risks associated with these pipelines, delay could threaten the health and safety of communities across the country.

Blending hydrogen, an explosive and leak-prone molecule, with methane heightens the risk of leaks, ruptures, and explosions, all of which could be catastrophic for health. Current pipelines and other infrastructure are designed for methane, not hydrogen; because hydrogen contributes to pipeline embrittlement, this blending makes leaks and other scenarios more likely. Any resulting leaks would release methane and hydrogen into the atmosphere, which would accelerate climate change and contribute to environmental and health inequities.

The dangers associated with hydrogen blending have been well-documented, in regard to its negative health impacts as well as the effect it will have in advancing climate change. Hydrogen ignites more easily and is more explosive than the methane with which it will be mixed. The prolonged reliance on methane that hydrogen encourages leads to increased indoor pollution from nitrogen dioxide, particulate matter and benzene. Currently, indoor air quality is unregulated, putting renters and people living in older homes that often have poor ventilation or

leaky appliances at greater risk of negative health impacts. This threat is greater for Black, Indigenous, and people of color who have inherited the legacy of redlining and other discriminatory housing practices in addition to systemic racism that impacts how much income people earn, the communities where they live, and the housing available to them. For greater detail on the dangers of hydrogen blending and for references, please see Physicians for Social Responsibility's 2022 report, *Hydrogen Pipe Dreams: Why burning hydrogen in buildings is bad for climate and health.*

While we believe that hydrogen blending has no place in the movement to decrease emissions, we are aware that it is occurring and as such, should be studied by PHMSA in order to enact safety measures. There is an urgent need for data collection and analysis on the impact of carrying a methane/hydrogen blend via pipeline. We welcome the role of PHMSA's proposal to establish reporting requirements that will hold industry to a higher safety standard and encourage public engagement on current and future projects.

Our organizations urge PHMSA to uphold the current 60-day comment period and to begin information collection on the fastest possible timeline in order to prioritize health and safety. We look forward to PHMSA's findings and forthcoming rulemakings regarding hydrogen blending. Thank you for the opportunity to comment on this proposal.

Sincerely,

Alliance of Nurses for Healthy Environments
Chesapeake Physicians for Social Responsibility
Medical Students for a Sustainable Future
Physicians for Social Responsibility
Physicians for Social Responsibility Iowa
Washington Physicians for Social Responsibility