Oil and Gas NSPS OOOOa
Status and Updates

AAPCA Presentation
August 27, 2019
Actions at a Glance

2016 NSPS

• **June 3, 2016**: EPA issued New Source Performance Standards (NSPS) for the oil and gas industry

NSPS Reconsideration

• **April 18, 2017**: EPA granted reconsideration on the NSPS

NSPS Amendments

• **October 15, 2018**: EPA proposed amendments and clarifications
• **November 14, 2018**: EPA held a public hearing in Denver
• **December 17, 2018**: Public comment period closed
2018 Proposed Amendments

Fugitive Emissions
- Monitoring frequency
- Repair requirements
- Definitions/exemptions
- Alaska

Alternative Means of Emission Limitation (AMEL)
- Emerging Technologies
- State/Tribal Programs

Storage Vessels

LDAR at Natural Gas Processing Plants

Note: This is not a complete list of proposed amendments.
Fugitive Emissions: Monitoring Frequency

Well sites
- Non-low production well sites: from semi-annual to annual
- Low production well sites: from semi-annual to biennial
- Monitoring can stop once all major production and processing equipment is removed from a well site, resulting in a wellhead-only well site

Compressor stations: from quarterly to semiannual or annual (co-proposal)
2018 Proposed Amendments

Fugitive Emissions: Repair Requirements

► First attempt at repair requirement within 30 days of finding a leak
  ► Defined “first attempt at repair” as action taken to stop or reduce fugitive emissions

► Final repair completed within 60 days of finding a leak
  ► Defined “repaired” to include the resurvey verifying successful repair
Proposed new definition of “well site” to include exemptions for specific equipment or site types:

- Exemption for third party equipment associated with the custody meter assembly
- Exemption for UIC Class II wells (saltwater disposal)

Proposed definition of “major production and processing equipment”

- Provides clarification for wellhead only site exemption from fugitive emissions requirements
- Provides off ramp from monitoring for well sites that later become wellhead only sites
Fugitive Emissions: Alaska

► March 2018 Amendments for well sites on the Alaska North Slope

► Initial monitoring:
  • Within 6 months of startup or by June 30, whichever is later (September – March startup)
  • Within 60 days of startup (April – August startup)

► Annual monitoring thereafter

► October 2018 proposal expands these amendments to compressor stations on the Alaska North Slope
AMEL: Emerging Technologies

► Streamlined application requirements
  ► Would allow owners/operators to apply with technology vendors or trade associations
  ► Clarification that an individual application could include the same technology for use at multiple sites
  ► Solicited comment on the application of AMEL on a basin-wide basis
  ► Would allow applicants to supplement field data with test data, modeling analyses, and other documentation
2018 Proposed Amendments

AMEL: State/Tribal Programs

- Proposed separate application requirements for determination of equivalent state/tribal fugitive emissions programs
- Proposed alternative fugitive emissions standards for specific states
  - California (well sites and compressor stations)
  - Colorado (well sites and compressor stations)
  - Ohio (well sites and compressor stations)
  - Pennsylvania (well sites and compressor stations)
  - Texas (well sites)
  - Utah (well sites)
Clarification of the determination of throughput for the purpose of calculating the potential VOC emissions from storage vessels

- Clarified throughput is determined on an individual storage vessel basis
- Explained when averaging throughput is allowed

**Note:** Storage vessels that are controlled because permit limits were taken prior to NSPS OOOOa applicability are monitored as part of the fugitive emissions requirements for the site.
Would update definition of capital expenditure

Solicited comment on the use of the Consumer Price Indices in place of the current capital expenditure equation

Would exempt components in VOC service <300 hours per year from monitoring
Public Comments: Overview

- 121 speakers at hearing
- Over 500,000 written comments
- Commenters represented various stakeholders
  - Industry
  - State, local and tribal governments
  - Non-industry advocacy groups
  - Congressional representatives
  - Private citizens
Overview of Public Comments

► Fugitive Emissions
  ► Model plant analysis
  ► Monitoring frequency

► AMEL
  ► Emerging technologies
  ► State/tribal programs

► Storage Vessels
Questions

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