



Oil and Gas NSPS 0000a

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.



2018 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

2018 Proposed Amendments

Fugitive Emissions: Definitions/Exemptions

- ▶ 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



2018 Proposed Amendments

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



2018 Proposed Amendments

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)

2018 Proposed Amendments

Storage Vessels

- ▶ 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 0000a applicability are monitored as part of the fugitive emissions requirements for the site.



2018 Proposed Amendments

LDAR at Natural Gas Processing Plants

- ▶ 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



Karen R. Marsh, PE

US EPA, OAQPS

Sectors Policies and Programs Division

Fuels and Incineration Group

(919) 541-1065

marsh.karen@epa.gov