



December 19, 2022

Mr. Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation (OAR)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Submitted via the Federal eRulemaking Portal at <https://www.regulations.gov>

Subject: 30-day comment period extension for supplemental notice of proposed rulemaking, “Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review” (Docket ID No. EPA-HQ-OAR-2021-0317)

Dear Mr. Goffman:

The Association of Air Pollution Control Agencies (AAPCA)¹ requests an extension of the current comment period for U.S. EPA’s supplemental notice of proposed rulemaking, “Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review.”² The supplemental proposal contains complicated policy and technical concepts that require significant state and local air agency review for an understanding of the needed implementation efforts in order to substantively comment. AAPCA is requesting that U.S. EPA provide an additional 30 days for comment, until March 15, 2023.

U.S. EPA’s supplemental proposal is intended to build on a November 2021 proposed rule that introduced revisions to the new source performance standards (NSPS) and emissions guidelines for greenhouse gases (GHG) and volatile organic compounds (VOCs) for the oil and natural gas sector.³ Regulatory text was not included in the initial proposal, and the current proposal and supporting documents, several hundred pages in length, contain key changes⁴ from the November 2021 proposal that are both novel and technically complex, with at least 142 areas U.S. EPA is soliciting comment.⁵ Adequate response to the significant policy and technical issues presented will require agencies to analyze and potentially model impacted sources, evaluate emission inventories, consult stakeholders, and examine compliance and enforcement needs, among numerous other actions.

¹ AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. Created in 2012, AAPCA represents 48 state and local air pollution control agencies, and senior officials from 21 state environmental agencies currently sit on the AAPCA Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of [The Council of State Governments](#). More about AAPCA is at: www.cleanairact.org.

² [87 Fed. Reg. 74702](#) (December 6, 2022).

³ [86 Fed. Reg. 63110](#) (November 15, 2021).

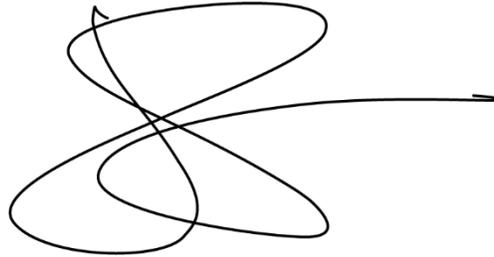
⁴ U.S. EPA, “[EPA’s Supplemental Proposal to Reduce Pollution from Oil and Natural Gas Operations: Key Changes Since the November 2021 Proposal and Areas Where EPA is Seeking Comment](#),” November 11, 2022.

⁵ [Memorandum](#) from U.S. EPA Office of Air Quality Planning and Standards, “Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review – Supplemental Proposed Rule Summary of Comment Solicitations” (October 2022).

AAPCA also notes that the comment period for the supplemental proposal spans several federal holidays, likely impacting the ability of agencies to develop comments. Providing an additional 30 days for comment will increase meaningful, applicable input to inform the final rule.

Thank you for considering this request to extend the comment period on U.S. EPA's supplemental proposal for the oil and gas sector. If you have any questions, please contact Mr. Jason Sloan, Executive Director, at jsloan@csg.org or (859) 244-8043.

Sincerely,



Jason E. Sloan
Executive Director, AAPCA