



February 7, 2023

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
EPA Docket Center
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2021-0317

Re: Comments on EPA's Proposed Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review

Dear Administrator Regan:

The Pennsylvania Department of Environmental Protection (DEP) appreciates the opportunity to submit comments on the U.S. Environmental Protection Agency's (EPA) proposed rules published in the *Federal Register* on December 6, 2022, pertaining to the "Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review." (87 FR 74702)

Regulatory Uncertainty

DEP recommends that EPA consolidate existing applicable regulations and streamline the proposed requirements for new and existing sources in the oil and natural gas (O&G) industry. Because this industry is already subject to multiple regulations, promulgating additional regulations for these sources could result in unpredictability and ambiguity for industry operators as well as state regulators. With multiple regulations, operators could miss important requirements, which would consequently increase the burden on state regulators in determining and enforcing compliance. The regulatory framework becomes even more complex when considering state regulations that were promulgated to comply with the State Implementation Plan (SIP) requirements for the 2016 Control Techniques Guidelines for the Oil and Natural Gas Industry (2016 CTG).

Because EPA intends to promulgate a new source performance standard (NSPS) and an emission guideline for existing sources in the O&G sector, the proposed rules should be modified to include all applicable existing requirements and replace 40 CFR Part 60 Subparts KKK, LLL, OOOO, and OOOOa, while also establishing appropriate volatile organic compound (VOC) and methane requirements for existing sources.

Secretary

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Streamlining the regulatory requirements by allowing both the industry and state regulators to determine regulatory applicability based on a singular date would be an efficient approach that would enable states to then streamline their regulations for the O&G industry when submitting their SIPs to comply with the emission guideline.

Covered Sources

DEP recommends that EPA incorporate the following changes to the proposed regulatory requirements for the source categories listed below:

Storage Vessels: The VOC emissions threshold to require VOC control should be 2.7 tons per year (TPY). Pennsylvania has required storage vessels in the O&G sector to control VOC emissions by 95 percent or greater since as early as 2013.

Pneumatic Controllers: DEP supports EPA's proposal to require all new and existing pneumatic controllers, including intermittent vent pneumatic controllers, to produce zero methane and VOC emissions.

Pneumatic Pumps: The practice of installing emissions controls based on the number of pumps at a facility should be replaced with an emissions threshold that governs the installation of emissions controls. Since 2018, natural gas-fired pneumatic pumps in Pennsylvania are required to control emissions by 95 percent or greater if the potential or actual emissions from the pumps exceed 200 TPY of methane or 2.7 TPY of VOC.

Reciprocating Compressors: DEP disagrees with the proposed rules' exemption for reciprocating compressors. Since 2018, Pennsylvania has required similar reciprocating compressors to replace the rod end packing after every 26,000 hours of operation or every 36 months. DEP also disagrees with EPA's proposal mandating that O&G operators must monitor and quantify emissions from the rod end packing and replace the packing if the volumetric flow rate exceeds 2 standard cubic feet per minute (scfm). DEP recognizes that 2 scfm is equivalent to a flow rate of 120 standard cubic feet per hour (scfh), which is approximately double the maximum emission rate of reciprocating compressors found in Table 7-2 of the technical support document (TSD) (EPA-HQ-OAR-2021-0317-0166). DEP suggests that EPA either reconsider the 2 scfm emission rate and reduce the emission rate to 1 scfm or less to be consistent with the emission rates in Table 7-2, or maintain the 26,000 operating hour or 36-month replacement schedule.

Fugitive Emissions Components: The frequency of leak detection and repair (LDAR) inspections should be as follows: monthly audio, visual, and olfactory (AVO) inspections at all affected facilities; semiannual instrument-based LDAR inspections for O&G well sites and remote pigging stations emitting less than 2.7 TPY of VOC; and quarterly instrument-based LDAR inspections for well sites and remote pigging stations emitting equal to or greater than 2.7 TPY of VOC, and for gathering and boosting stations, natural gas processing plants, and transmission stations. Pennsylvania has required similar sources to perform monthly AVO inspections and quarterly or semiannual instrument-based LDAR inspections since 2013.

Additional Sources

DEP recommends that EPA adds the following source categories to the existing proposed regulatory requirements:

Glycol Dehydration Units: EPA should establish requirements to reduce methane and VOC emissions by 95 percent or more from new and existing glycol dehydration unit still vents if their potential or actual emissions exceed 200 TPY of methane or 2.7 TPY of VOC. DEP has required 95 percent VOC control on glycol dehydration units since 2018.

Pigging Operations: EPA should establish requirements to reduce methane and VOC emissions from new and existing pigging operations. DEP has required pigging operation to control VOC and methane emissions since 2018.

Threshold for Multiple Sources Controlled by a Single Device: EPA should require multiple sources that can be controlled by a single emission control device to comply with a 2.7 TPY VOC emission threshold. For example, if EPA were to adopt the 2.7 TPY VOC threshold for each storage vessel, glycol dehydration unit, and pneumatic pump individually, these singular sources could emit less VOC emissions than the current threshold and remain uncontrolled. However, if their combined emissions were considered, they would emit nearly 8 TPY of VOC without control, whereas it is cost effective to control VOC emissions at 2.7 TPY. DEP recommends that EPA establish a 2.7 TPY VOC emission threshold and 20 TPY methane emission threshold for multiple sources that can be controlled by a single control device.

Conclusion

DEP is grateful for the opportunity to comment on these proposed rules and recommends that EPA prioritize streamlining and consolidating all the applicable existing regulations in these proposed regulations while also strengthening the requirements for the existing source categories and including the additional source categories discussed above. Please contact Mark Hammond, Director of DEP's Bureau of Air Quality, by email at mahammond@pa.gov or by telephone at 610.613.8681 with any questions or comments.

Sincerely,



Richard Negrin
Acting Secretary