

EGs for GHG Emissions from Existing Oil & Natural Gas Facilities (40 CFR Part 60 Subpart OOOOo) Update

Bureau of Air Quality
02/06/2025

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Pennsylvania
Department of
Environmental Protection



RECAP

- On October 10, 2024, the PA Department of Environmental Protection (PA DEP) gave a presentation to AQTAC members regarding EPA's Emissions Guidelines (EGs) for Greenhouse Gas (GHG) Emissions from Existing Crude Oil & Natural Gas Facilities (40 CFR Part 60 Subpart OOOOc)
- The EGs establish presumptive standards through the application of best system of emission reduction (BSER) to reduce GHG emissions through methane limitations for sources constructed, reconstructed, or modified on or before December 6, 2022.



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- The topics of the 10-10-2024 presentation included an overview of EGs.
- The discussion included subject sources, PA DEP's approach for development of the State Plan to comply with the requirements of OOOOc, source specific requirements of the Model Rule, meaningful engagement, the timelines including dates for publishing the proposed State Plan for public comments, DEP's deadline for submitting the State Plan to EPA, and compliance date for owners and operators.



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- The requirements in the State Plan are applicable to production and processing, gathering and boosting compressor stations, natural gas processing plants, and natural gas transmission and storage, including compressor stations and storage tank batteries.
- The requirements in the State Plan are adopted from the Model Rule that EPA established in the EGs (OOOOc).



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KEY TIMELINE

- 1st quarter of 2025 – PA DEP anticipates publication of the notice of public comment.
- March 9, 2026 – PA DEP’s deadline to submit the proposed State Plan to EPA.
- First Quarter of 2029 – Compliance date for owners/operators.



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UPDATES

- State Plan requirements include PA DEP's obligation to include enforcement measures.
- Enforceable measures must be legally and practically enforceable.



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GENERAL PERMIT

- The PA DEP is developing a General Permit (GP) approach to enforce 40 CFR Part 60 Subpart OOOOc.
- The GP approach will establish requirements that are consistent with the Model Rule.



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GENERAL PERMIT

- In addition to Model Rule requirements, the GP requirements will also contain standard conditions regarding state specific regulations.
- The GP approach will streamline any conflicting requirements between existing applicable requirements and the requirements in the OOOOc Model Rule to incorporate the most stringent applicable standard.



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GENERAL PERMIT

- Proposed GP approach will be published in *Pennsylvania Bulletin* for public comment separately from the State Plan.
- Comments received during the public comment period will be reviewed by PA DEP and revisions may be incorporated, as necessary.
- Final GP approach will be included in the final State Plan submission to the EPA.



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Get In Touch

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The Department of Environmental Protection's mission is to protect Pennsylvania's air, land and water resources and to provide for the health and safety of its residents and visitors, consistent with the rights and duties established under the Environmental Rights Amendment (Article 1, Section 27 of the Pennsylvania Constitution).