



# The PIOGA press

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## EQB publishes proposed rulemaking for control of VOC emissions from existing oil and natural gas sources

Pennsylvania's Environmental Quality Board (EQB) published a proposed rulemaking in the May 23 *Pennsylvania Bulletin* entitled "Control of VOC Emissions from Oil and Natural Gas Sources." 50 Pa.B. 2633

([www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol50/50-21/684.html](http://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol50/50-21/684.html)). This proposed rulemaking would have Pennsylvania adopt reasonably available control technology (RACT) requirements and RACT emission limitations for existing oil and natural gas sources of volatile organic compound (VOC) emissions.

As proposed, the rule would apply to owners and operators of any of the following oil and natural gas sources of VOC emissions that were in existence on or before the effective date of this rulemaking: storage vessels (in all segments except natural gas distribution), natural gas-driven pneumatic controllers, natural gas-driven diaphragm pumps, centrifugal compressors and reciprocating compressors, and fugitive emission components.

This proposal is based on EPA's October 2016 Control Techniques Guidelines (CTG) for the Oil and Gas Industry, which provide RACT requirements for VOC emissions from existing oil and gas sources. Pursuant to the federal Clean Air Act, EPA established National Ambient Air Quality Standards (NAAQS) for six "criteria pollutants," which includes ground-level ozone. Ground level ozone is created in a photochemical reaction of oxides of nitrogen (another criteria pollutant) and VOCs in the presence of sunlight.

The federal statute requires any (i) existing major source of VOC emissions (generally more than 50 tons per year of VOC depending on location) in an ozone nonattainment area and (ii) any other source (i.e., minor sources) for which EPA has issued a CTG to implement RACT to control emissions, consistent with the issued CTG. Pennsylvania is in the northeast ozone transport region, which makes the

Commonwealth nonattainment for ozone, and thus triggers RACT under federal law.

The Clean Air Act requires states to revise their State Implementation Plans to include RACT for sources of VOC emissions covered by a CTG issued by the U.S. Environmental Protection Agency. The EPA proposed withdrawing the CTG in March 2018 but has not yet taken final action; Pennsylvania has continued to develop this rulemaking to meet the CTG implementation deadline of January 2021.

Despite the potential rollback of the CTG and other federal regulations by EPA, the Pennsylvania Department of Environmental Protection explained that it moved forward with this proposed rulemaking because:

1. DEP reviewed EPA's reconsideration of the 2016 NSPS and, based on that proposed rule, modified this proposed rulemaking;
2. adoption of the proposed rule would help the Commonwealth achieve and maintain the eight-hour ozone NAAQS;
3. DEP estimates that proposed control measures would reduce VOC emissions by more than 4,000 tons per year; and
4. The rulemaking would provide consistency among all oil and gas sources for monitoring fugitive emissions.

These requirements are consistent with the leak detection and repair (LDAR) inspection requirements specified in DEP's General Plan Approval and General Operating Permit for Natural Gas Compression Stations, Processing Plants and Transmission Stations (GP-5); the General Plan Approval and General Operating Permit for Unconventional Natural Gas Well Site Operations and Remote Pigging Stations (GP-5A); and the Air Quality Permit Exemptions, Exemption 38. EQB's May 23 proposal also notes that the rulemaking is consistent with Governor Tom Wolf's strategy to

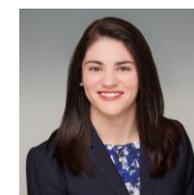
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reduce methane from the oil and natural gas industry because, while this rulemaking focuses on the reduction of VOC emissions, methane emissions would also be reduced as a co-benefit since both VOCs and methane are emitted from oil and gas operations.

EQB is accepting written comments regarding this proposed rulemaking until July 27. Additionally, EQB will hold three virtual public hearings regarding the proposed rulemaking on June 23, 24 and 25.