# TCEQ LogoNational Comments

# Executive Review Summary

**TCEQ Proposed Comments On:** United States Environmental Protection Agency (EPA); Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration; EPA Docket ID No. EPA-HQ-OAR-2017-0483

**Overview of Proposal:**

On October 15, 2018, the EPA proposed amendments to the 40 Code of Federal Regulations Part 60, Subpart OOOOa new source performance standards (NSPS) for new and modified sources in the oil and natural gas sector (83 FR 52056). The EPA proposed these amendments in response to petitions for reconsideration of certain aspects of the standards, which were originally adopted in 2016. The EPA granted reconsideration on three issues: (1) Fugitive emissions requirements; (2) well site pneumatic pump standards; and (3) the requirements for certification of closed vent systems by a professional engineer. The proposed amendments primarily relate to these three subject areas, but the EPA also proposed amendments to make other technical corrections and clarifications. The TCEQ and the Railroad Commission of Texas (RRC) are submitting joint comments on the proposed changes.

**Summary of Comments:**

* The TCEQ supports the EPA's proposed approach of allowing certain state-based fugitive emission monitoring programs to be used as an alternative to the default fugitive emission monitoring requirements of the standards.
* The TCEQ supports the EPA's proposed finding that certain TCEQ fugitive emission monitoring programs are substantially equivalent to the default fugitive emission monitoring requirements in Subpart OOOOa, but notes that the EPA should include components at compressor stations within the scope of the EPA's proposed determination of equivalency.
* **The TCEQ continues to support withdrawal of the Control Techniques Guidelines (CTG) for the Oil and Natural Gas Industry. At a minimum, the EPA should delay any state CTG submission requirements until finalization of the proposed NSPS revisions.**

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**Deadline (Submittal Due Date): December 17**, 2018