

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
1	Centrifugal Compressor NSPS	V.A	...on the suitability of a compliance option allowing the use of wet seals combined with routing of emissions from the seal liquid through a closed vent system to a control device as an acceptable alternative to installing dry seals.	52746	1
2	Reciprocating Compressor NSPS	V.A	...on the appropriateness of a fixed replacement frequency and other considerations that would be associated with regular replacement.	52746	2
3	SSM Provisions	V.B.4	...on whether there are any SSM provisions that were inadvertently overlooked or incorporated in the proposed new regulatory language.	52747	3
4	Recordkeeping and reporting	V.C.1	...on innovative implementation approaches being considered and other potential methods of streamlining notification and reporting for well completions covered by the proposed rule.	52747	3
5	Innovative Compliance Approach	V.D	...on an innovative way to provide for more transparency to the public and less burden on the regulatory agencies and owners and operators, especially as it relates to modification of existing sources through recompletions of hydraulically fractured gas wells.	52749	2
6	Innovative Compliance Approach	V.D	<p>...and suggestions on all aspects of the following innovative compliance approaches and how they may be implemented appropriately:</p> <ul style="list-style-type: none"> • Registration of wells and advance notification of planned completions • Third party verification • Electronic reporting using existing mechanisms • Provisions for encouraging innovative technology. <p>Request for comment regarding the scope of application of one or more of the above approaches, <i>i.e.</i>, which provisions of the standards being proposed would be suitable for specific compliance approaches, and whether the approaches should be alternatives to the requirements in the regulations.</p>	52749	3

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
7	Innovative Compliance Approach: Registration of wells and advance notification of planned completions	V.D.1	...on potential methodologies that would minimize burden on operators, while providing timely and useful information for regulators and the public.	52749	3
8	Innovative Compliance Approach: Registration of wells and advance notification of planned completions	V.D.1	...on provisions for a follow-up notification one or two days before an impending completion via telephone or by electronic means, since it is difficult to predict exactly when a well will be ready for completion a month in advance.	52749	3
9	Innovative Compliance Approach: Registration of wells and advance notification of planned completions	V.D.1	... regarding how much advance notification is needed and the most effective method of providing sufficient and accurate advance notification of well completions.	52750	1
10	Innovative Compliance Approach: Third party verification	V.D.2	...on the potential use of third party verification to assure compliance as a complement to the annual compliance certification under the proposed NSPS.	52750	1
11	Innovative Compliance Approach: Third party verification	V.D.2	...on whether annual reports for well completions would be needed if a suitable third party verification program was in place and already housed that same information.	52750	2
12	Innovative Compliance Approach: Third party verification	V.D.2	...on the range of potential activities the third party verification program could handle with regard to well completions	52750	2
13	Innovative Compliance Approach: Third party verification	V.D.2	We are seeking comment on appropriate third party reviewers and qualifications and registration requirements under such a program.	52750	2

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
14	Innovative Compliance Approach: Third party verification	V.D.2	...on whether third party verification paid for by industry would result in impartial, accurate and complete data information.	52750	2
15	Innovative Compliance Approach: Third party verification	V.D.2	...on whether or not the EPA should approve third party verifiers.	52750	2
16	Innovative Compliance Approach: Electronic reporting using existing mechanisms	V.D.3	...on requiring sources to electronically submit their emissions data for the oil and gas proposed rules.	52750	2
17	Innovative Compliance Approach: Provisions for encouraging innovative technology	V.D.4	...on approaches that may be suitable for allowing temporary field testing of technology in development.	52750	3
18	LDAR	VI.B.1	...on the applicability of an LDAR program based solely on the use of optical gas imaging, including information on the effectiveness of this and, potentially, other advanced measurement technologies, to detect and repair small leaks on the same order or smaller than specified in the 40 CFR part 60, subpart VVa equipment leak requirements and the effects of increased frequency of and associated leak detection, recording and repair practices.	52755	2
19	Produced water ponds	VI.B.3	...pertaining to methods for calculating emissions. The State of Colorado currently uses a mass balance that assumes 100 percent of the VOC content is emitted to the atmosphere. Water9, an air emissions model, is another option that has some limitations, including poor methanol estimation.	52756	3
20	Produced water ponds	VI.B.3	...with additional information on typical VOC content in produced water and any available chemical analyses, including data that could help clarify seasonal variations or differences among gas fields.	52756	3
21	Produced water ponds	VI.B.3	...with data that increase our understanding of how changing process variables or age of wells affect produced water output and VOC content.	52756	3

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
22	Produced water ponds	VI.B.3	...with information on the size and throughput capacity of typical evaporation pond facilities and request suggestions on parameters that could be used to define affected facilities or affected sources.	52756	3
23	Produced water ponds	VI.B.3	...with information on impacts of smaller evaporation pits that are co-located with drilling operations, whether those warrant control and, if so, how controls should be developed.	52756	3
24	Produced water ponds	VI.B.3	...with information on cost of emission reduction technologies, including recovery credits or cost savings realized from recovered salable product.	52757	1
25	Produced water ponds	VI.B.3	...with information on any limitations for emission reduction technologies such as availability of electricity, waste generation and disposal and throughput and concentration constraints.	52757	1
26	Produced water ponds	VI.B.3	...with information on separator technologies that are able to improve the oil-water separation efficiency.	52757	1
27	NSPS for well completions	VI.B.4.a	... on the proposed operational standard rather than a performance standard and seeks input on whether alternative approaches to requiring REC for all operators with access to pipelines may exist that would allow operators to meet a performance-based standard if they can demonstrate that an REC is not cost effective.	52758	3
28	NSPS for well completions	VI.B.4.a	...on whether there are other such situations where flaring would be unsafe or infeasible, and potential criteria that would support venting in lieu of pit flaring.	52758	3
29	NSPS for well completions	VI.B.4.a	...on criteria and thresholds that could be used to exempt some well completion operations occurring in coalbed methane reservoirs from the requirements for subcategory 1 wells.	52758	3
30	NSPS for well completions	VI.B.4.a	...on whether sufficient supply of this equipment and personnel to operate it will be available to accommodate the increased number of REC by the effective date of the NSPS.	52758	3
31	NSPS for well completions	VI.B.4.a	...with specific estimates of how much time would be required to get enough equipment in operation to accommodate the full number of REC performed annually.	52758	3

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
32	NSPS for well completions	VI.B.4.a	...on the phasing of requirements for REC along with suggestions for other ways to address a potential short-term REC equipment shortage that may hinder operators' compliance with the proposed NSPS, while also achieving a comparable level of reduced emissions to the air.	52759	1
33	NSPS for well completions	VI.B.4.a	...and any available technical information to judge whether our assumption of \$33,237 per well completion for this service given the projected number of wells in 2015 subject to this requirement is accurate.	52759	1
34	NSPS for well completions	VI.B.4.a	... and supporting data on appropriate thresholds (<i>e.g.</i> , pressure, flowrate) that we should consider in specifying which well completions are subject to the REC requirements for subcategory 1 wells.	52759	1
35	NSPS for well completions	VI.B.4.a	...with information on economic, technical, or other opportunities or barriers that should be considered and suggestions for how to take them into account in structuring the NSPS.	52759	2
35	NSPS for well completions	VI.B.4.a	...on whether there are other such situations where flaring would be unsafe or infeasible and potential criteria that would support venting in lieu of pit flaring.	52759	3
36	NSPS for well completions	VI.B.4.a	...on the 10 percent per year rate of refracturing for natural gas wells assumed in the impacts analysis found in the TSD. E	52760	1
37	NSPS for well completions	VI.B.4.a	...and comprehensive data and information on the rate of refracturing and key factors that influence or determine refracturing frequency	52760	1
38	NSPS for pneumatic controllers	VI.B.4.b	...on whether there are other situations that should be considered for the proposed exemption where pneumatic controllers meeting the 6 scf/hr emission standards would pose a functional limitation due to their actuation time or other operating characteristics.	52761	1
39	NSPS for compressors - centrifugal	VI.B.4.c	...on available cost data of a dry seal versus wet seal compressor, including all ancillary equipment costs.	52762	1
40	NSPS for compressors - centrifugal	VI.B.4.c	...on the emission reduction potential, cost and any limitations for the option of routing the centrifugal compressor gas back to a low pressure fuel stream to be combusted as fuel gas.	52762	2

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
41	NSPS for compressors – centrifugal	VI.B.4.c	... on whether there are situations or applications where wet seal is the only option, because a dry seal system is infeasible or otherwise inappropriate.	52762	2
42	NSPS for compressors – reciprocating	VI.B.4.c	...on incorporating in the NSPS a method similar to that in the Natural Gas STAR’s Lessons Learned where periodic testing is conducted to determine the leakage rates that would identify economically beneficial replacement of rod packing based on natural gas savings.	52763	1
43	NSPS for compressors – reciprocating	VI.B.4.c	...on how to determine a suitable leak threshold above which rod packing replacement would be cost effective for VOC emission reduction	52763	1
44	NSPS for compressors – reciprocating	VI.B.4.c	...on the appropriate replacement frequency and other considerations that would be associated with regular replacement periods.	52763	1
45	NSPS for equipment leaks	VI.B.4.e	...on the applicability of a leak detection and repair program based solely on the use of optical imaging or other technologies, including information on the effectiveness of advanced measurement technologies to detect and repair small leaks on the same order or smaller as specified in the VVa equipment leak requirements and the effects of increased frequency of and associated leak detection, recording, and repair practices.	52766	1
46	SSM	VI.B.5	...that contend that sources cannot meet the proposed standard during startup and shutdown periods should provide data and other specifics supporting their claim.	52766	1
47	MACT Dataset	VII.A	...based on a detailed review of the information in the MACT dataset and updated information where appropriate.	52767	3
48	Risk Assessment	VII.C.1.c	...on the use of the occupational values described above in the interpretation of these worst-case acute screening exposure estimates.	52773	3
49	Risk Assessment	VII.C.1.g	...on the approaches used for the demographic analyses and the interpretations made from the results, with the hope that this will support the refinement and improve the utility of such analyses for future rulemakings.	52774	3

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
50	Risk Assessment – oil and natural gas production	VII.C.2.b	...on whether or not 90 days after the effective date is sufficient time for the large dehydrators that have been relying on this compliance alternative to come into compliance with the 95-percent control requirement or if additional time is needed.	52780	2
51	Risk Assessment – oil and natural gas production	VII.C.2.b	...on impacts of the removal of the 0.9 Mg/yr compliance alternative and whether such impacts warrant adding a different compliance alternative that would result in less risk than the 0.9 Mg/yr benzene limit compliance option.	52780	2
50	Risk Assessment – natural gas transmission and storage	VII.C.3.b	...on whether or not 90 days after the effective date is sufficient time for the large dehydrators that have been relying on this compliance alternative to come into compliance with the 95-percent control requirement or if additional time is needed.	52783	3
51	Risk Assessment - natural gas transmission and storage	VII.C.3.b	...on impacts of the removal of the 0.9 Mg/yr compliance alternative and whether such impacts warrant adding a different compliance alternative that would result in less risk than the 0.9 Mg/yr benzene limit compliance option.	52783	3
52	NESHAP MRR	VII.E.2	...on the practicality of including provisions in the final rule for a CEMS to monitor BTEX emissions for small glycol dehydration units.	52787	1
53	SSM	VII.E.3	...on whether there are any SSM provisions that were inadvertently overlooked or incorporated in the proposed new regulatory language.	52787	2
54	Calculation of PTE for oil and natural gas production	VII.E.4	...regarding the likelihood of HAP emissions increasing despite decreasing natural gas throughput due to changes in gas composition, and data demonstrating the circumstances where it occurs.	52788	2
55	Calculation of PTE for oil and natural gas production	VII.E.4	...regarding the addition of provisions in the NESHAP to require area sources to recalculate their PTE to confirm that they are indeed area sources and whether that calculation should be performed on an annual or biannual basis to verify that changes in gas composition have not increased their emissions	52788	3

Summary and Location of Requests for Comments in Oil and Natural Gas Sector Proposal (76 FR 52738-52798)

	Category	Section of Preamble	Request for Comment...	FR Page	Column
56	Cost, environmental, energy and economic impacts – benefits	VIII.I	...from interested parties and the public about the interim GWP approach specifically and more broadly about appropriate methods to monetize the climate benefits of methane reductions.	52793	1
57	Cost, environmental, energy and economic impacts – benefits	VIII.I	...regarding social cost of methane estimates that may be used to value the co-benefits of methane emission reductions anticipated for the oil and gas industry from this rule.	52793	1
58	Cost, environmental, energy and economic impacts – benefits	VIII.I	...specific to whether GWP is an acceptable method for generating a placeholder value for the social cost of methane until interagency-modeled estimates become available are welcome.	52793	1
59	Request for comments	IX	...with additional data that may help to reduce the uncertainties inherent in the risk assessments; specifically corrections to the datasets used for MACT analyses and risk modeling.	52793	3
60	Regulatory flexibility act	XI.C	...comments on issues related to impacts of the proposed rule on small entities.	52796	2
61	Federalism	XI.E	...on this proposed rule from state and local officials	52796	3
62	Consultation and coordination with Indian Tribal Governments	XI.F	...on this proposed action from tribal officials	52796	3
63	Protection of Children from Environmental Health Risks and Safety Risks	XI.G	...or peer-reviewed studies and data that assess effects of early life exposure to HAP from oil and natural gas sector activities.	52796	3
64	NTTAA	XI.I	...on proposed VCS and, specifically, invites the public to identify potentially-applicable VCS and to explain why such standards should be used in this regulation.	52797	3
65	Environmental Justice	XI.J	... on the approaches used in the demographic analyses and the interpretations made from the results, with the hope that this will support the refinement and improve utility of such analyses for future rulemakings	52798	1