2018 OIL AND GAS NSPS RECONSIDERATION INTERAGENCY REVIEW Appendix B

KEY OMB / INDUSTRY INPUT					
			EPA RESPONS	E	Industry input to EPA in March and April (API, GPA Midstream) regarding fugitive emissions monitoring data
			17,2018 2017-0483-0056		
nitial briefing to OMB: EPA's Option 2 Proposed) included semiannual monitoring at wellisites for 2 years, ollowed by annual monitoring (and annual monitoring at low production vellisites and Alaskan North Slope	wellsites and compressor stations). EPA's Option 2 (Proposed) also included quarterly monitoring at compressor stations		2, 2018	EPA memo to Docket with its analysis of fugitive emissions monitoring data provided by API concluded EPA will retain its leak rates and emission factors and solicitadditional information in the reconsideration proposal	EPA memo to Docket with its analysis of compressor station fugitive emissions monitoring data provided b GPA stated it was unable to conclude that the leak rates will sharply decline following the initial survey for compressor stations
OMB recommends EPA consider choosing Option 3 of the RIA as it provides for the highest net benefits	Option 3 is the least stringent option and includes annual monitoring at wellsites and semiannual monitoring at compressor stations (and exempts low production wellsites and Alaskan North Slope wellsites and compressor stations)	EPA-HQ-OAR-	2017-0483-0071	OMB recommends EPA consider a phase down approach that eventually is less than annual for non-low production well sites (e.g., every 18 or 24 months)	OMB recommends EPA revise the initial monitoring timeframe from 60 to 180 days. "To note, while it may be "feasible" for companies to meet the 60-day timeframe to ensure compliance with regulatory requirements, it may not be cost- effective"
EPA responds that while Option 3 rovides for the highestnet benefits, it ilso provides the highest amount of oregone emission reductions.	"EPA disagrees with [OMB] that the highest net benefit option should be chosen in this case, given that cost- effective options are available as demonstrated in the BSER analysis presented in the TSD."		2017-0483-0073	"EPA disagrees with [OMB's] suggestion to extend the monitoring beyond annual monitoring for non-low production well sites. The analysis and available data demonstrate that it is cost-effective to complete monitoring at the proposed frequency."	EPA: "The deadline for the initial monitoring does not affect the cost of the rule." "Additionally, we had already extended the initial monitorin from 30 days as proposed in 2015 to 60 days as promulgated in 2016."
	OMB includes several comments related to EPA proposing and promoting an Option 4, which would include the provisions of Option 3, except with annual inspections at compressor stations.	JUNE	7, 2018	OMB's review questioned EPA's emissions data interpretations and net benefitestimations and also included several comments on low production wells.	OMB: "Improvement of the emission reduction estimates to address lower emission factors and lower reduction over time would also [] increase the estimated cost / ton figures, and likel strengthen the policy basis for Option 4."
EPA provided a detailed response to support its continued conclusion that, IEPA followed the requirements in the statute when setting the BSER for ugitive emissions monitoring at compressor stations as quarterly OGI monitoring."	"The EPA has evaluated the data provided by the industry and reaches the same conclusion that quarterly monitoring is cost-effective for compressor stations."	EPA-HQ-OAR-	2017-0483-0076	"In contrast to the statutorily required BSER analysis, the quantified net benefits presented in the RIA are based solely on monetization of the increase in methane emissions. While we cannot monetize the increase in VOC emissions (which is regulated"	" under subpart OOOOa), we canno ignore its impact, in particular in ozon nonattainment areas. The net benefit analysis also does not consider increases in other air emissions (e.g., HAP), as well as nonair quality health and environmental impacts."
EPA: "Interagency comments prompted EPA to reevaluate the options and re- examine the data that supports these options."			JUNE 12, 2018 HOAR-2017-0483-0066 EPA suggests revisions to Option "that would better reflect what of supported by the currently avaid data." EPA notes uncertainties industry provided data (e.g., AF The new Option 3 includes quid (instead of semiannual) monit		t can be iailable swith API, GPA). juarterly
The Interstate Natural Gas Association of America (INGAA) submitted a white paper to OMB and EPA Re: leak emission estimates			21, 2018 2017-0483-0077	compressor stations and bienial (instead of an exemption from) monitoring at low production well sites EPA's analysis of the information included in the INGAA White Paper does not result in EPA changing its analysis for the NSPS	
comment revisions (EPA con	still feel that annual monitoring for compressors and the other option 3	EPA-HQ-OAR-	8, 2018 2017-0483-0063 0, 2018 2017-0483-0062	EPA provided revisions based on OMB's July 18 comments including proposing changes to the monitoring frequency requirement at compressor stations from quarterly to semiannual. "Similar to our analysis for well sites, we recognize that our analysis likely overestimates the emission reduction and therefore, the cost-effectiveness of each of the three monitoring frequencies due to the areas of"	EPA performed a sensitivity analysis "to understand how the monitoring frequencies would affect emission reductions and costs" and was unable to conclude that quarterly monitoring cost-effective for compressor stations concerns described previously for non-low production well sites (e.g., assumed constant percentage of fugitive emissions, uncertainties regarding emission reductions achieved, etc.)."
MB edit to NPRM suggests deleting PA's statement that it has not sceived data that supports changing te monitoring frequency to annual tonitoring. OMB suggests adding dditional text regarding INGAA report.	EPA disagrees with OMB edits and in an EPA [staff email] response to OMB regarding monitoring frequency at compressor stations, EPA maintains its position that annual monitoring is not justified.		T 14, 2018	OMB submitted followup comments to EPA on stakeholder input (e.g., INGAA)	
"we chose the option that provides the best emission reductions when considering cost semi-annual monitoring for compressor stations [] can achieve greater emission reductions for a cost that is well within the acceptable cost of control."	"the incremental cost to control VOC emissions when going from semi- annual to quarterly monitoring exceeded the range we typically consider cost-effective, but the cost [] when going from annual to semiannual [] was well within the acceptable range"	AUGUST	2017-0483-0058 [17, 2018 2017-0483-0055	supporting higher emissions reductions at less frequent monitoring intervals (in support of annual monitoring at compressor stations).	5
				"EPA disagrees with the conclusions made in the INGAA report that is referenced and has twice previously provided reponse to EO 12866 commenters regarding this issue."	August 27, 2010 EDA momo to Da
			7 27, 2018 2017-0483-0053	EPA revises NPRM to include a co- proposal of semiannual and annual monitoring at compressor stations	August 27, 2018 EPA memo to Dov with its analysis of fugitive emission data provided by INGAA states "we unable to conclude at this time that information supports annual monitu for compressor stations."