



## Early Stakeholder Outreach — New Rules Regulating Emissions from the Oil and Gas Industry

*Ohio EPA prepares early stakeholder outreach fact sheets to ensure stakeholders are brought into the review process as early as possible and to obtain additional input and discussion before development of interested party draft rules.*

### What do these new rules cover?

Ohio EPA intends to develop rules that cover air pollution emissions from oil and gas facilities associated with unconventional<sup>1</sup> oil/gas recovery and processing. These rules would cover similar equipment and requirements as is currently covered by U.S. EPA's New Source Performance Standards (NSPS) for the oil and natural gas sector under 40 CFR Part 60, Subpart OOOOa. Typical facilities would include oil and gas well sites and gas compressor stations. The rules would cover both existing and new sources.

### Why are these rules being sent out for Early Stakeholder Outreach?

The first step in the rule-making process is for Ohio EPA to identify that a rule needs to be amended, rescinded, or created. In response to EO 2011-01K, Ohio EPA has added an additional step to ensure stakeholders are brought into the rule process as early as possible. This additional interested party notification and request for information will allow for early feedback before the rule language has been developed by the Agency.

### What specific regulations are being considered?

Ohio EPA envisions the regulations to be similar in format and coverage to U.S. EPA's NSPS Subpart OOOOa for the oil and natural gas sector. At a minimum, these rules will cover:

- Equipment installed at an oil and gas well site including dehydrators, heaters, compressors, storage tanks, equipment leaks – all of the typical equipment involved in processing the gas once it leaves the well.
- Equipment installed at mid-stream compressor stations including similar equipment as listed above at well sites.
- We also expect the rules to be a combination of NSPS requirements and Ohio EPA requirements as found in Ohio EPA's current General Permits for well sites and compressor station equipment.
- We expect the rules to cover all unconventional oil and gas facilities, unlike the NSPS which covers only "new, reconstructed or modified" facilities.

### How can I provide input?

The Agency is seeking stakeholder input on these new rules. When preparing your comments, be sure to:

- explain your views as clearly as possible;
- describe any assumptions used;
- provide any technical information and/or data used to support your views;
- explain how you arrived at your estimate for potential burdens, benefits or costs;
- provide specific examples to illustrate your views; and
- offer alternatives.

Written comments will be accepted through close of business **Wednesday, December 19, 2018**. Please submit input to:

Mr. Mike Hopkins  
Ohio EPA Division of Air Pollution Control  
PO Box 1049  
Columbus, Ohio 43216-1049  
(614)644-3611  
Mike.hopkins@epa.ohio.gov

### What if I have questions?

If you have any questions, please contact Mr. Hopkins. You can also view the model general permit for well sites and compressor stations at:

<https://www.epa.ohio.gov/dapc/genpermit/genpermits>

<sup>1</sup> Unconventional wells include horizontal drilling and hydraulic fracturing of the play.

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## Who will be regulated by these rules?

These rules will govern the owners and operators of all unconventional oil and gas facilities.

## What is the rulemaking schedule?

Upon completion of the Early Stakeholder Outreach portion of this rulemaking, Ohio EPA will make any changes necessary to the rule language and make a draft of the rule language available to the public for a 30-day review.

## What input is the Agency seeking?

The following questions may help guide you as you develop your comments.

- What options are available for improving an identified concept?
- Are there considerations the Agency should take into account when developing these rules?
- Are there considerations the Agency should take into account when developing a specific concept?
- Is there any information or data the Agency should be aware of when developing program concepts or rule language?

The following questions may help guide you as you develop your comments.

Ohio EPA would especially like to hear information regarding the following from stakeholders who may be impacted by the new program.

- Would this regulatory program have a positive impact on your business? Please explain how.
- Would this regulatory program have an adverse impact on your business? If so, please identify the nature of the adverse impact (for example, license fees, fines, employer time for compliance).

## Contact

For more information, contact Michael Hopkins at [mike.hopkins@epa.ohio.gov](mailto:mike.hopkins@epa.ohio.gov) or 614-644-3611.