



# OVERVIEW OF THE “PROPOSED” NEW SOURCE STANDARDS FOR OIL AND NATURAL GAS INDUSTRY

Select Standards: Storage Tanks, Pneumatics, and  
Liquids Unloading

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# Proposed Standards of Performance

## ■ Storage Vessels

- 0000b
  - 6 TPY VOC would apply to new/modified/reconstructed tank battery
  - 95% reduction
- 0000c
  - Tank battery applicability of CH<sub>4</sub> PTE of 20 TPY
  - 95% reduction
- FEM to include:
  - Thief hatches
  - Other openings



# Proposed Standards of Performance

- Pneumatic controllers
  - Zero-emissions
  - All **new and existing** components
  - Intermittent controllers
  - Reference of existing State and Provincial regulations
    - Various options
    - Owner/operator choice flexibility
- Pneumatic Pumps
  - OOOOb expands on existing regulations
    - Production – All NG-driven diaphragm & piston pumps
    - Transmission – All diaphragm pumps
  - OOOOc similar – excludes piston pumps
  - EPA requests comments on feasibility of zero-emission pneumatic pumps at new/existing facilities with electric/solar availability
- Compressor Station LDAR
  - Quarterly (60-day separation)



*E. D. Thoma, et al*

# Proposed Standards of Performance

- Well liquids unloading with zero VOC/CH<sub>4</sub> emissions
  - “Each affected well that unloads liquids employing techniques or technologies that eliminate or minimize venting of emissions during liquids unloading events to the maximum extent.”
  - Co Proposal Option 1
    - Any well that undergoes liquid unloading using zero-emissions techniques
      - Recordkeeping
      - Malfunction/operator error
        - Vent duration/volume
        - Mitigation efforts
    - Wells that vent to atmosphere
      - Document why
      - Develop BMP
      - Record events
      - Report

# Proposed Standards of Performance

- Well liquids unloading cont.
  - Co Proposal Option 2
    - Wells that undergo liquids unloading using methods not designed to eliminate venting
      - Wells that utilize non-venting methods:
        - Not be affected facilities subject to the NSPS OOOOb.
        - Maintain records to document use of non-venting methods.
      - Wells that use methods that vent:
        - Requirements are same as Option 1
        - EPA requested comments:
          - Well stream venting direction
          - Emissions estimates