

NSPS 0000 and 0000a: Amended and Final Rules



The EPA recently amended NSPS 0000 and finalized NSPS 0000a. These standards regulate emissions at onshore crude oil and natural gas facilities.

- **Subpart 0000 applies to facilities constructed, modified, or reconstructed after August 23, 2011 and on or before September 18, 2015.**
- **Subpart 0000a applies to facilities constructed, modified, or reconstructed after September 18, 2015.**

OVERVIEW

On May 12, 2016, the U.S. Environmental Protection Agency (EPA) amended New Source Performance Standard (NSPS) Subpart 0000 and finalized NSPS Subpart 0000a - *proposed on August 18, 2015*. These subparts apply to onshore crude oil and natural gas facilities. NSPS 0000a includes many of the same requirements as 0000, plus additional regulations to limit emissions of VOC and GHGs. The regulated sources of emissions include:

- Compressors
- Equipment Leak Fugitive Emissions
- Pneumatic Controllers
- Pneumatic Pumps
- Storage Vessels
- Sweetening Units
- Well Completions

AMENDED & NEW REQUIREMENTS

The significant amended and new requirements of NSPS 0000 and NSPS 0000a by emissions source type are summarized in the following table. (**PAGE 2**)

SOURCE DETERMINATION RULE

The EPA also issued guidance on the definition of **source** and the concept of **adjacency**. This guidance clarifies which oil and gas activity emissions must be aggregated for permitting purposes - *PSD, NNSR, and Title V*. Equipment and activities are deemed **adjacent**, or part of the same **source**, if they are:

- Within the same industrial grouping - same SIC.
- Under common control.
- Located at the same site, or within ¼ mile of each other.

WE CAN HELP!

Providence can help with this new suite of regulations, whatever your needs may be. Providence has experience with regulatory analyses, gap assessments, leak detection and repair programs, recordkeeping systems, permitting, and air dispersion modeling. Contact **Rajiv Patel, PE** at 512-582-6416 or rajivpatel@providenceeng.com.

NSPS 0000 AND 0000A: AMENDED AND NEW REQUIREMENTS

Affected Facility	NSPS	Well Sites	Compressor Stations	Natural Gas Processing Plants
Compressors: Centrifugal with Wet Seals	0000 & 0000a	No change from existing NSPS 0000 applicability and requirements.		
Compressors: Reciprocating	0000 & 0000a	No change from existing NSPS 0000 applicability and requirements.		
Equipment Leak Fugitives	0000	Applicable: No	Applicable: No	No change from existing NSPS 0000 applicability and requirements.
	0000a	Applicable: To fugitive emission components -as defined in §60.5430a, unless only wellheads located at site. New Requirements: Develop a Monitoring Plan. Survey using OGI or Method 21 (500 ppm threshold) within 60 days and then semi-annually, at least 4 months apart. Repair leaks within 30 days and resurvey within 30 days, if feasible.	Applicable: To fugitive emission components - as defined in §60.5430a. New Requirements: Develop a Monitoring Plan. Survey using OGI or Method 21 (500 ppm threshold) within 60 days and then quarterly, at least 60 days apart. Repair leaks within 30 days and resurvey within 30 days, if feasible.	
Affected Facility	NSPS	Well Sites	Compressor Stations	Natural Gas Processing Plants
Pneumatic Controllers	0000/ 0000a	No change from existing NSPS 0000 requirements.		
Pneumatic Pumps	0000	Applicable: No	Applicable: No	Applicable: No
	0000a	Applicable: To natural gas driven diaphragm pumps operated ≥ 90 days/yr. New Requirements: Route to control device or process, if feasible. Control ≥ 95%, if feasible. Otherwise, document and certify the technical infeasibility.	Applicable: No	Applicable: To all natural gas driven diaphragm pumps. New Requirements: Zero emissions.
Storage Vessels	0000 & 0000a	Amended Applicability: Vessels >100,000 gal used to recycle water that has been passed through two stage separation are exempt. Requirements: No changes.		
Sweetening Units	0000 & 0000a	No change from existing NSPS 0000 applicability and requirements.		
Well Completions (Hydraulically Fractured)	0000	No change from existing NSPS 0000 applicability and requirements.		
	0000a	New Applicability: Oil wells now subject, in addition to previously regulated gas wells. New Requirements: Wells with a GOR ≤ 300 scf/bbl are exempt. For subcategory 1 wells, separator must be kept onsite during entire flowback, ready to install - unless no liquids present.		

There are also performance testing, compliance demonstration, recordkeeping, notification, and reporting requirements not detailed in this table. Consult the rule text for these requirements, or call us!

