



DOI/BOEM Clean Air Reporting and Compliance Proposed Rule January 13, 2016

BOEM's mandate, under the Outer Continental Shelf Lands Act (OCSLA), is to regulate Outer Continental Shelf (OCS) activities only if the emissions from the activities have significant effects on onshore air quality. The Act specifically states:

*"for compliance with the national ambient air quality standards pursuant to the Clean Air Act (42 U.S.C. 7401 et seq.), to the extent that activities authorized under this Act **significantly affect the air quality of any State.**"*
[Section 5(a)(8)]

Outer Continental Shelf (OCS) sources have not been shown to impact onshore air quality.

States bordering OCS lease areas conclude OCS emission sources are not significant or otherwise preventing NAAQS attainment.

- The Houston-Galveston-Brazoria ozone State Implementation Plan (SIP) includes OCS sources in background contribution but were not significant.
- The Baton Rouge ozone SIP included OCS sources in background contribution and the area is currently proposed for attainment designation.
- The St. Bernard parish (LA) SO₂ SIP does not include OCS or any other sources more than 20 km from the nonattainment area, and focuses solely on two local onshore industrial facilities.

Numerous Department of Interior studies have concluded that OCS emissions do not have a significant effect to onshore air quality.

- BOEM's most recent Programmatic Environmental Impact Statement (BOEM 2012-030) addresses the 2012-2017 OCS oil and gas leasing program. It includes photochemical modeling studies indicating maximum contributions of 0.2-1.0 ppb to ozone concentrations at onshore areas exceeding the 75 ppb NAAQS.
- Three EISs for the current (2012-2017) leasing program specifically conclude that onshore air quality impacts will be minimal or insignificant: the 2012-2017 Western and Central Planning Area EIS (BOEM 2012-019), the 2014-2016 Western Planning Area EIS (BOEM 2014-009), and the 2015-2017 Central Planning Area EIA (BOEM 2014-655).
- In addition to the NEPA documents for the current OCS leasing program discussed above, API reviewed twenty-four EISs and Environmental Assessments published by BOEM and the Minerals Management Service between 2002 and 2015 addressing oil and gas lease sales in the Gulf of Mexico region. None of these documents conclude that oil and gas activities have the potential to endanger onshore air quality.
- Finally, the 2012-2017 lease sale EIS (OCS EIS/EA 2012-019) specifically states that existing regulations are sufficient to prevent adverse onshore air quality impacts:
 - *"Regulations, activity data reporting via the [Gulfwide Offshore Activity Data System] reporting requirement, and mitigation, such as monitoring the performance of the catalytic converter, would ensure [pollutant concentrations] stay within the NAAQS."* (section 4.1.1.1.2)

