CARB response to EPA oil and gas NSPS reporting question

July 8, 2020

# In CARB’s meeting with OMB and EPA staff on July 7, 2020, CARB explained that, even if EPA ill-advisedly finalizes its proposed removal of transmission and storage sources from the oil and gas source category, it need not and should not repeal the reporting and recordkeeping requirements and ICR. Clean Air Act section 114(a) authorizes reporting, monitoring, recordkeeping, and related requirements, whether or not sources are listed under section 111.[[1]](#footnote-1) The reported data provide value to EPA, State, local, and Tribal regulators, and the public. For example, California utilizes emissions inventories to estimate greenhouse gas emissions associated with imported natural gas pursuant to state law.[[2]](#footnote-2)

EPA/OAQPS staff asked CARB, if transmission and storage sources are removed from the source category and no longer have LDAR requirements, which reporting and recordkeeping requirements could usefully be retained. CARB provides the following, more detailed response.

* EPA should retain all reporting requirements for transmission and storage sources that exceed the data collected and published by EPA’s GHGRP.[[3]](#footnote-3) This may include:
	+ Unaggregated production data
	+ Information concerning design and performance
	+ Data on venting and flaring
	+ Mitigation measures’ technical feasibility and costs
	+ All reporting requirements for sources below GHGRP’s reporting threshold
* CARB's oil and gas regulation requires reporting by facilities that are not required to implement controls.[[4]](#footnote-4) Reporting requirements include:
	+ Equipment numbers
	+ Throughput
	+ Emissions from open well casing vents
	+ Emissions from liquids unloading events
1. 42 U.S.C. § 7414(a)(iii). [↑](#footnote-ref-1)
2. Cal. Health and Safety Code § 39607 (amended by Assembly Bill 2195, Chap. 371, Stats. 2018). [↑](#footnote-ref-2)
3. 40 C.F.R. Part 98 Subpart W, Petroleum and Natural Gas Systems. [↑](#footnote-ref-3)
4. 17 Cal. Code Regs. §§ 95665-95677. [↑](#footnote-ref-4)