February 14, 2023

Via electronic submission (http://www.regulations.gov)
Attn: EPA-HQ-OAR-2004-0014
United States Environmental Protection Agency
Air Quality Policy Division, Office of Air Quality Planning and Standards (C504-05)
Research Triangle Park, NC

Re: EPA-HQ-OAR-2004-0014; Proposed Rule to Repeal 2008 Regulatory Amendments to the Clean Air Act Addressing Consideration of Fugitive Emissions

Dear Sir or Madam:

GPA Midstream Association ("GPA Midstream") and GPSA Midstream Suppliers ("GPSA Association") appreciate this opportunity to submit comments on the U.S. Environmental Protection Agency's ("EPA") proposal to repeal a final rule adopted in 2008 pursuant to the Clean Air Act ("CAA" or "Act") (the "2008 Rulemaking") and reverse long-established CAA regulations by requiring sources to consider "fugitive" emissions when determining whether a physical or operational change would trigger New Source Review ("NSR") or requirements under the Act (the "Proposed Rule"). 87 Fed. Reg. 62,322 (Oct. 14, 2022).

GPA Midstream has served the U.S. energy industry since 1921 and has over 60 corporate members that directly employ more than 56,000 employees that are engaged in a wide variety of services that move vital energy products such as natural gas, natural gas liquids ("NGLs"), refined products, and crude oil from production areas to markets across the United States, commonly referred to as "midstream activities." The work of our members indirectly creates or impacts an additional 396,000 jobs across the U.S. economy. GPA Midstream members gather over 77% of the natural gas and recover more than 80% of the NGLs such as ethane, propane, butane, and natural gasoline produced in the United States from more than 380 natural gas processing facilities. In the 2019–2021 period, GPA Midstream members spent over $100 billion in capital improvements to serve the country's needs for reliable and affordable energy.

GPSA Association has served the US energy industry since 1928. With over 250 member companies, GPSA's mission is to be the prominent resource for service and supply solutions to the midstream energy industry, focused on common goals and industry advancement through proven knowledge, innovation, products, and performance.

GPA Midstream and GPSA are interested in the Proposed Rule because our members often obtain permits for minor changes at facilities where fugitives currently are excluded from relevant

major modification determination. This includes nonattainment areas with low or extremely low major modification thresholds (e.g., 25 tons versus 40 tons). Including fugitive emissions in major modification determinations could subject many projects to the more onerous Prevention of Significant Deterioration ("PSD") and Nonattainment NSR ("NNSR") (collectively, "NSR") permitting requirements. We are particularly concerned with the practical effect of the Proposed Rule requiring the consideration of fugitive emissions, in view of the attendant permitting and regulatory burdens associated with an already complex NSR review process, as well as potential additional controls and offset requirements—all without any demonstrable benefit to human health and the environment.

Accordingly, as outlined below, we urge EPA to reconsider this proposed action, which runs counter to the administration's goal to utilize existing energy infrastructure to expand fossil fuel production and processing in order to strengthen energy security and lower costs.[1] Increased regulatory hurdles, operational requirements, and unknown costs will only serve to discourage affected sources to increase capacity, grow, and innovate, while increasing the price of goods and services.

I. EPA Should Reconsider the Proposal, Because it is Fundamentally Based on an Unsound and Inconsistent Reading of the Clean Air Act

We urge EPA to reconsider its proposal to extend its regulation of fugitive emissions, because it is not supported by the text of the Clean Air Act—and is founded on an inconsistent reading of the statute. In the Proposed Rule, EPA fundamentally bases its proposal on the claim that it reaffirming "its [longstanding] interpretation that language in CAA § 302(j) regarding fugitive emissions applies only in the major source context, and not in the major modification context." Proposed Rule at 62,327. EPA is correct that CAA § 302(j)'s plain language, which does reference fugitive emissions, does not mention "major modification." *See* 42 U.S.C. § 7602. However, EPA then goes on to state that it "proposes to interpret CAA section 111(a)(4) to require that all sources consider increases in all type of emissions (including fugitive emissions)," Proposed Rule at 62,327, despite the fact that CAA § 111(a)(4) does not explicitly include fugitive emissions.

CAA §302(j) defines a "major stationary source" as that "which directly emits, or has the potential to emit, one hundred tons per year or more of <u>any air pollutant (including any major emitting facility or source of fugitive emissions of any such pollutant)</u>." 42 U.S.C. § 7602(j). In contrast, CAA §111(a)(4) uses the exact same phrase "any air pollutant" in defining a "modification," but omits any mention of fugitive emissions of any such air pollutant. 42 U.S.C. § 7411(a)(4). Regardless of EPA's alleged history "interpreting" these two provisions as recited in the preamble, it is the statutory language that must govern, and EPA's Proposed Rule ignores Congress's decision to expressly define emissions of "any air pollutant" to include fugitives in CAA §302(j) and its contrary decision not to include the same language in CAA §111(a)(4) when defining the scope of pollutants covered. Thus, Congress clearly understood it needed to specify

[1] White House, *Remarks by President Biden on Actions to Strengthen Energy Security and Lower Costs* (Oct. 19, 2022), https://www.whitehouse.gov/briefing-room/speeches-remarks/2022/10/19/remarks-by-president-biden-on-actions-to-strengthen-energy-security-and-lower-costs/.

and expansively provide for "fugitive emissions" in CAA §302(j) – because it was not otherwise covered by the general reference to "any air pollutant." The Proposed Rule reads this difference out of the statute in a manner that effectively makes "fugitive emissions" in CAA § 302(j) mere surplusage—contrary to a basic tenet of statutory construction.

As the principal statutory basis for the Proposed Rule is not well founded, we urge EPA not to proceed with this proposal and, instead, maintain the exemption for modifications deemed "major solely due to the inclusion of fugitive emissions."

II. Historical Application of NSR Permitting for Major Modifications Supports Excluding Fugitive Emissions

Beyond the statutory text, we urge EPA to retain the existing regulatory text to exclude fugitive emissions when determining whether a change is a major modification, because it is consistent with the agency's actual, longstanding regulatory text—as interpreted and applied by the agency's highest legal body. The only longstanding and clear statement of law on whether to consider fugitive emissions in evaluating whether a change triggers NSR review at a major source is that set out in the actual regulatory text promulgated by the EPA—regulatory text that has remained in the C.F.R. for 40 years. This regulatory text has not only been applied in practice, but it has been relied upon by permitting agencies and affected sources alike in evaluating whether a change triggers NSR, including Prevention of Significant Deterioration ("PSD") or NNSR requirements. Moreover, that regulation has been sustained by EPA's Environmental Appeals Board ("EAB"). These are the best evidence of EPA's longstanding view of the CAA's various requirements.

We do of course observe that EPA asserts in the draft preamble that its regulations were not aligned with its actual interpretation, suggesting that regulatory text was "inadvertently" included or left behind in the regulations. *See* Proposed Rule at 62,326–27. However, the regulatory text has remained in place over more than 40 years and despite repeated opportunities to revise its regulations, illustrating the exact opposite of inadvertence. Indeed, EPA has not only retained the regulatory text, it has even recodified the regulation when it made other changes to the NSR rules. *See, e.g.* 45 Fed. Reg. 52,739 (Aug. 7, 1980) (adopting exemption from PSD for modifications considered "major" only due to inclusion of fugitive emissions); 67 Fed. Reg. 8,016 (Dec. 31, 2002) (NSR Improvement Rule maintaining and recodifying 1980 exemption). Repeatedly declining to revise these regulations is further compelling evidence that retaining the regulatory text was not a mistake, but the best evidence of the actual final decision by EPA—one that was a common sense approach to determining the CAA's requirements in classifying a facility modification for purposes of NSR and PSD.

Thus, despite EPA's prose in its Proposed Rule, the simple fact is that EPA's regulations have consistently excluded fugitive emissions from an NSR major modification determination. Indeed, the single instance of EPA actually revising the regulatory text to remove the exclusion of fugitive emissions from major modification determinations only occurred when EPA strengthened its own conclusion that fugitive emissions were already excluded from such determinations. 73 Fed. Reg. 77,882 (Dec. 19, 2008) (removing exemption language in 40 C.F.R. §§ 51.165(a)(4), 51.166(i)(1)(ii), 52.21(i)(1)(vii), and II.F of part 51, appendix S as unnecessary as part of EPA's

updated definition of "major stationary source" to include only the section 302(j) source categories and its policy that fugitive emissions not be counted for non-section 302(j) source categories in major modification determinations).

Finally, EPA has consistently upheld this regulatory text as authoritative, including EPA's highest legal authority: the EAB. As the Proposed Rule acknowledges, the EAB decision *In re Masonite Corp.*, 5 EAD 551 (EAB 1994) illustrates EPA's longstanding rule to exclude fugitives from modification determinations. In *Masonite*, the EAB agreed with general principle that fugitive emissions were excluded from the determination of whether a modification was "major" for purposes of PSD requirements. The EAB relied on EPA's own preamble language as well as the regulatory text to conclude "the first inquiry is whether the addition [of new equipment] constitutes a major modification based on the increased emissions of *any* regulated pollutant. *For purposes of that inquiry, fugitive emissions may not be counted.*" *Masonite*, at 582 (citing 40 C.F.R. § 52.21(i)(4)(vii) (later recodified at 40 C.F.R. 52.21(i)(1)(vii) and 54 Fed. Reg. 48,870 (Nov. 28, 1989)). Importantly, the EAB issued its ruling *after* the interpretive guidance that the Proposed Rule claims reflects EPA's longstanding view.

In view of this actual longstanding regulation, EPA should reinstate the 2008 Rulemaking and decline to proceed to a Final Rule.

III. Even Assuming EPA Had the Ability to Change How it Treats Fugitive Emissions for Major Modifications, the Agency Should Not Proceed With This Rule

Even assuming EPA has the discretion to change how it treats fugitive emissions when evaluating a project at a major source, EPA would not be legally compelled to interpret the CAA as EPA has proposed. Here, EPA should exercise its discretion not to take the proposed action.

A. EPA has not provided the required rationale for changing a longstanding regulation

Even if EPA could abandon its longstanding rule, EPA must still provide a sufficient reason for its change. *Fed. Commc'ns Comm'n v. Fox Television Stations, Inc.*, 566 U.S. 502 (2009). Yet, we submit the Proposed Rule fails to do so, in contrast to EPA's 2008 Rulemaking confirming the exclusion of fugitive emissions from the NSR determination. *See* 73 Fed. Reg. at 77,888 (including a section titled, "What is the rationale for this final action?" and describing the precise reasons for the rulemaking and describing various reasons for adopting a uniform approach that EPA believed "more accurately represent[ed] the original intent of Congress in establishing the section 302(j) provisions and the resultant 1980 rules that followed).

EPA does not, for example, address or respond to the rationale set forth in the 2008 Rulemaking. Although EPA describes the Petition for Reconsideration it received in response to the 2008 Rulemaking, Proposed Rule at 62,330, EPA simply concludes that EPA "does not consider it appropriate to allow existing major sources in non-listed source categories to omit increases and decreases in fugitive emissions when evaluating whether a physical or operational change constitutes a major modification," and asserts in a conclusory fashion that it is "well-justified in returning to its longest-standing view…" *Id.* at 62,331.

These conclusory statements do not provide any demonstrable basis for changing a regulatory provision that has consistently been on the books for 40+ years. This is not "consistency for consistency's sake," as EPA appears to contend. Rather, numerous facility actions and investments across the country relied on the policy of consistent treatment of fugitive emissions considerations in permitting notable projects at facilities over time. As such, maintaining consistent regulatory treatment of fugitive emissions at the same facility makes good policy. Indeed, contrary to EPA's assumptions, this proposal could unduly constrain facilities that have an appreciable number of fugitive emissions points and corollary fugitive emissions. Such facilities may or may not actually trigger NSR, but, with low and declining significance thresholds, a future change could require extensive review and unnecessarily constrain reasonable facility improvements for facility's long permitted based on the existing regulations.

In all events, EPA's conclusory statements suggest that the agency has not documented and evaluated fully the potential costs associated with the Proposed Rule, the regulatory burden on affected facilities and infrastructure across the country, and the regulatory burden that this revision would impose on affected state and local permitting agencies. We urge EPA to consider fully those impacts and make that analysis available for stakeholders to consider, before proceeding to finalize this proposal.

B. EPA Should Consider Fully the Potential Costs and Related Burdens Imposed on Regulated Sources Because of the Proposed Rule

In the Proposed Rule, EPA makes a number of assumptions regarding the costs associated with including fugitive emissions when determining whether a modification would result in a net emissions increase at a major source that would trigger NSR/PSD review. We urge EPA to reconsider its assumptions—and, at a minimum, conduct a more complete analysis based on actual data and cost information.

In particular, in the Proposed Rule, EPA assumes the affected sources are large and "relatively well-resourced" and thus "represent the type of 'facilities, which, due to their size, are financially able to bear the substantial regulatory costs imposed by the PSD provisions and which . . . are primarily responsible for emissions of the deleterious pollutants that befoul our nation's air.'" Proposed Rule at 62,334. EPA also assumes the Proposed Rule would have a "limited practical impact and result in limited increased burden for regulated entities." *Id.* EPA reasons these assumptions are valid because it claims the status quo has included fugitive emissions in all major modification determinations and the regulatory fugitive emission "exemption" has "generally not been relied on by sources." *Id.*

GPA Midstream and GPSA Association urge EPA to reconsider these assumptions, for which EPA offers no record-based evidence in support. For one, EPA offers no evidence to support its assumption that the proposal would have little impact, because it submits that sources have not relied on the exclusion. As EPA knows, under the regulatory text, including the text of parallel state programs, fugitive emissions are not and need not be considered. It is illogical, at best, to presume that states and sources have not followed the law, and EPA has offered no data to support this assumption.

Moreover, while EPA acknowledges that the change it is proposing would impose "substantial regulatory cost" such as by substantially increasing the regulatory burden and the associated financial impact of complying with additional regulatory requirements, it does not calculate the additional burden. And EPA's conclusory statement that it has "assessed the potential costs and benefits," with no data in support, is insufficient to satisfy its obligations to make reasoned decisions, as well long-established practice under Executive Orders 12866 (Sept. 30, 1993) and 13563 (Jan. 18, 2011). The Proposed Rule has not, for example, considered the cost and difficulties for a source to measure and/or estimate either baseline fugitive emissions—or the potential net increase from a proposed change. In our sector, significant equipment, personnel, and time is needed to measure emissions associated with small individual valves and other small sources of emissions that can be difficult to access, or are distanced far apart and are not easily measured. Thus, additional data gathering is not of "limited practical impact," but presents a substantial additional investment of time and resources. We acknowledge that some equipment in our sector is already subject to leak detection and repair ("LDAR") requirements that could be used to identify a baseline of emissions for some pollutants, but that is of limited value. The Proposed Rule would require a source—any time there is a physical change—to both update its baseline of fugitive emissions and to determine whether the change would cause an increase at any of the many potential sources of fugitive emissions. Tracing those potential fugitive emissions and tying them back to a proposed change could be an extraordinarily difficult and burdensome undertaking.

Moreover, EPA has likewise provided no analysis of how many of the thousands of major sources across the country that it anticipates would be subject to additional PSD/NSR permit review as a result of this proposed change. That, of course, is, as EPA acknowledges, a significant additional burden that needs to be evaluated in assessing whether the change proffered by this proposal should be adopted. Further, EPA knows well, obtaining a PSD/NSR permit is costly and time consuming—often taking years before agencies with limited resources issue a permit, which is then often appealed by interested stakeholders.[2] This unknown administrative cost on sources and agencies, and the cost associated with long delays in receiving these permits, needs to be developed and considered.

Further, beyond obtaining the permit, the Proposed Rule does not consider the costs that a source would have to incur to comply with NSR/PSD requirements, such as new equipment, additional monitoring and recordkeeping. These may prove even more challenging in nonattainment areas where NNSR applies, for example, where sources may be newly subjected to offset requirements. This could present an ever increasing burden, given that EPA is contemplating a lower national ambient air quality standard for ozone, which would significantly expand the geographic area of the country subject to non-attainment review. That could result in a substantial cost associated with obtaining emissions offsets/credits, even assuming they would be available. It is already the case in some states, such as Colorado, that there is often no market availability of such offsets/credits.

[2] EPA is supposed to act on a PSD permit application within one year, but permitting often takes far longer. *Avenal Power Center, LLC v. U.S. EPA*, 787 F. Supp.2d 1 (D.C. Dist. 2011) (PSD permit application under review at EPA for more than three years after application deemed complete).

In its proposal, EPA simply assumes that major sources are financially capable of meeting and absorbing all of these requirements. That type of bald assertion is surely not the requisite record for making the significant regulatory change that EPA proposes. Moreover, regardless, the cost to meet these requirements is only one aspect of the associated burden. The Proposed Rule also does not consider the costs to a business that results when there are potential delays in making required changes, while a source waits for a permit to be issued if required.

In view of these real and practical concerns, EPA should reconsider its Proposed Rule. At a minimum, we urge EPA to first conduct a comprehensive review of the impacts of this contemplated change on affected sources before proceeding—and allow stakeholders to consider that information in a further public comment process.

C. EPA Should Likewise Consider Fully the Increased Regulatory Confusion and Burden the Proposed Rule Would Place on State and Local Permitting Agencies

EPA further asserts that the Proposed Rule would "restore clarity, certainty, and consistency to the regulations." Proposed Rule at 62,333. We urge EPA to reconsider this assessment, which is not founded on any actual study of the effects of this change in the regulations. We urge EPA to defer proceeding with this revision in order to gather actual data on the potential effect of this rule, including on state authorities that will be left to implement these changes.

First, EPA would better meet its stated objectives of restoring clarity by restoring the 2008 Rulemaking and reaffirming that the direction of the longstanding text in the regulation is, in fact, what governs. That would provide clarity, certainty, and consistency—retaining an approach that has been in the rules for over 40 years.

Second, the Proposed Rule adds to uncertainty because it offers no uniform manner or guidance through which state and local permitting agencies would determine the extent of fugitive emissions sufficient to verify a source's permit application. As noted, it will likely prove difficult for sources to determine the baseline and extent of change to such baseline of fugitive emissions, which would be required in many cases for multiple NSR-regulated pollutants. Moreover, whether there is no change in fugitive emissions or there is a potential increase, state permitting agencies will need to tie fugitive emissions back to the proposed modification and determine whether additional requirements are necessary in light of these emissions.

Third, and perhaps most importantly, state agencies (and applicants alike) will face significant new burdens to permit additional sources where fugitive emissions trigger NSR/PSD requirements. As EPA does and must acknowledge, that permitting process is lengthier and more burdensome, and will demand substantially more state resources to handle the permitting process. Notably, there are states that have *never* issued a NNSR permit for major sources or major modifications because they do not have the capacity to manage the additional regulatory and administrative burden. Yet, there is no mention in the Proposed Rule of the future of affected sources and state agencies where this would become a problem. EPA should review and analyze

these additional burdens—and the associated delays—before proceeding further with this rulemaking.

Ultimately, EPA failed to account for these considerations and should therefore reconsider its Proposed Rule. However, should EPA continue to finalize the Proposed Rule, we encourage EPA to more fully address these concerns and revise any final rule to provide permitting agencies the flexibility needed to assess an individual modification application on a permittee-by-permittee basis.

IV. Localized Impacts Are Not Documented—But in All Events, Are Better Addressed By Decisions Made By Local Entities and Thus This Proposal Should Be Left to the States – and Certainly Should Not Be a SIP Minimum Program Element

EPA also asks for comments on whether localized impacts warrant this type of regulation. Proposed Rule at 62,332. At this time, we are aware of no data to support EPA's suggestion that localized impacts support the need for changing the way the regulations consider fugitive emissions, let alone warrant the additional burdens the rule would impose on affected sources and permitting agencies. If EPA is going to rely on alleged benefits from reducing localized impacts, it needs to provide that information to the public for notice and comment before proceeding to finalize this type of rule.

Moreover, regardless, the fact that there may allegedly be localized impacts that may be driving EPA's thinking on this proposal highlights that this type of change is not one that should be forced down to the state level by a federal regulation. Indeed, even if promulgated, the revision should not be made a minimum program requirement of state implementation plans. Congress made clear in the CAA that states ought to have the primary authority in regulating, overseeing, and permitting emissions sources: "air pollution prevention (that is, the reduction or elimination, through any measures, of the amount of pollutants produced or created at the source) and air pollution control at its source is the primary responsibility of States and local governments." 42 U.S.C. § 7401(3)(emphasis added). Therefore, instead of mandating additional measures, the state and local permitting agencies should be left to determine whether they wish to assume this additional authority in view of data identifying localized impacts in a particular regional area or at a state level. The "one-size-fits-all" approach also ignores the existing state and local programs that have been designed to specifically address the CAA needs of their communities and affected sources.

V. GPA Midstream and GPSA Association Generally Support EPA's Proposal to Retain the Existing Definition of Fugitive Emissions, But Urge EPA to Ensure Continued Flexibility

Overall, GPA Midstream and GPSA Association generally support EPA's decision to maintain the existing definition of fugitive emissions as those emissions "which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening." Proposed Rule at 62,335 (citing 40 C.F.R. § 52.21(b)(20)). However, we believe EPA's recitation of additional guidance and its explicit reversal of language in the 2008 Rulemaking, including

"cost of control" considerations and support for case-by-case analysis, should be removed from any final rule.

EPA has historically considered the cost of collection or capture in determining whether emissions are fugitive, but EPA's focus on the "cost of control" in the 2008 Rulemaking as an additional, reasonable consideration provides additional flexibility that is important in sectors such as ours where it may be easier to calculate the cost of collection, capture, and control rather than the data on collection or capture alone. 2008 Rulemaking at 77,891. This language merely provides permitting authorities the flexibility needed to adequately consider the cost factor associated with determining what constitutes a "fugitive emission" and EPA's removal of such language further undermines state and local permitting authorities' ability to address source-specific or industry-specific needs.

The decision of what constitutes a "fugitive emission," when not uniformly and clearly established across an industry sector or specific types of equipment, is best left to the judgment of the permitting agency, as informed by the affected source who has substantial knowledge of the source and its operations, including, for example, whether emissions from leaks, upsets, and other non-routine events constitute "fugitives." And the 2008 Rulemaking's language making clear that EPA has not established a "specific methodology [which] states must use in conducting the case-by-case analysis" is important to maintaining this flexibility. 2008 Rulemaking at 77,891. This type of one-on-one determination and flexibility for permitting agencies is necessary to ensure permitting agencies are able to analyze all factors they consider relevant. Conversely, an overly strict and narrow interpretation of the definition by EPA may lead to future enforcement action that would be unfairly punitive, in view of the difficulties associated with both the affected source's and a permitting agency's attempts to quantify fugitive emissions where necessary. To the extent EPA receives comments and believes it should proceed to revise this definition in any manner, however, EPA should do so in a separate rulemaking.

Relatedly, while retaining flexibility for state programs to implement any new regulation once incorporated, there are practical implementation considerations that EPA should address – and that could be addressed best in a further proposal before finalizing any regulation. As an example, EPA should be clear that the fugitive emissions to be considered are only the alleged actual additional emissions that are fugitive emissions and that are projected to be caused by the proposed project. In that way, if a source is required to consider projected actual fugitive emissions, it should be allowed to consider past fugitive emissions in determining baseline emissions, so the source does not have an artificially low baseline.

VI. Any Final Rule Should Not Be Applied Retroactively

Finally, should EPA move forward with its Proposed Rule, we urge EPA to make clear the rule is not retroactive. As such, EPA should confirm that only projects initiated fully after the rule is incorporated into the governing state implementation plan and is fully and finally effective would need to consider fugitive emissions in determining whether the project is a physical or operational change that caused a source to exceed the major modification threshold. To avoid uncertainty in implementation, EPA should be clear in establishing criteria that make it clear that a source has initiated a project if it has applied for an air permit or initiated contracting for

equipment in a circumstance where a permit is not required. These criteria should be made available for further public review and comment, before EPA finalizes any regulation.

Relatedly, EPA should likewise confirm the converse—that it will not apply a new rule governing fugitive emissions to any physical or operational changes made before the rule becomes effective, whether or not it obtained a permit. This proposal should simply not in any way be applied to past minor source determinations, whether made by the source or a regulator. EPA has provided no indication that any retroactive application of its proposal is intended or otherwise supported by the Clean Air Act here and, as such, it has no power to apply the Proposed Rule retroactively. *Bowen v. Georgetown Univ. Hosp.*, 488 U.S. 204, 208–09 (1988).

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GPA Midstream and GPSA Association urge EPA to withdraw and reconsider its Proposed Rule. We appreciate the opportunity to submit these comments and is standing by to answer any questions you may have.

Respectfully submitted,

/s/ *Matt Hite*

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