



August 25, 2023

Via electronic submission
(<http://www.regulations.gov>)
Attn: EPA-HQ-OAR-2022-0879
United States Environmental Protection
Agency EPA Docket Center
WJC West Building, Room 3334
1301 Constitution Avenue NW
Washington, DC 20004

Re: 88 Fed. Reg. 41,361 (June 26, 2023) National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines and New Source Performance Standards: Internal Combustion Engines; Electronic Reporting

Dear Sir or Madam:

GPA Midstream Association (“GPA Midstream”) appreciates this opportunity to submit comments on the U.S. Environmental Protection Agency’s (“EPA”) proposed rulemaking, 88 Fed. Reg. 41,361 (June 26, 2023) creating electronic reporting requirements for engines regulated under 40 C.F.R. Part 60, Subparts IIII and JJJJ, as well as Part 63, Subpart ZZZZ. GPA Midstream’s members own and operate many of these interests, giving them a significant interest in any change to reporting obligations.

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.

GPA Midstream generally supports the proposed rulemaking, however, we offer the following comments suggesting relatively minor changes to the Subpart ZZZZ draft reporting template and to EPA’s interpretation of the term “annually” with respect to Subpart ZZZZ oil change scheduling. In addition, we note that the proposed rulemaking will introduce duplicative reporting obligations as many states have their own electronic reporting systems

and EPA should provide additional time beyond 180 days for vendors to learn to use the Electronic Reporting Tool (“ERT”).

Subpart ZZZZ Draft Reporting Template

- Under the “Company Information” tab, columns M (“Does the statement ‘There were no deviations from any emission or operating limits during the reporting period’ apply to this facility?”) and N (“Does the statement ‘There was no periods during which the CMS was out-of-control during the reporting period’ apply to this facility?”) should be moved to the “Engine Information” tab as the questions refer to each engine’s compliance status, not the reporting company.
- The “Company Information” tab should include an optional “Site Name” column. If a company is providing a report for multiple facilities, it would be difficult to discern facility identity based on the information currently provided on this tab. Furthermore, having a custom record ID for each site would make filling out the “Engine Information” tab less prone to error, particularly when submitting a single form for multiple facilities that each have multiple engines. EPA could use Data Validation options to limit the character length for custom record IDs (*e.g.*, CMPA and CMPB for Compressor Stations A and B). This option is already available in other reporting forms such as for 40 C.F.R., Part 63, Subpart YYYY.
- Under the “Engine Information” tab, reporting companies must only fill out columns I, J, and K when reporting deviations, however, there is no column where the company reports that a deviation occurred, *e.g.*, “Was there a reportable deviation for this engine?” If such a question is not added, then the CEDRI QA/QC checker should be configured to allow for an “N/A” or similar response to the questions in columns I, J, and K. The form could also include an additional tab that appears when anything other than “N/A” would be selected in Column K.
- Under the “Engine Information” tab, add an optional “Engine ID” column. Although the spreadsheet currently requires that the reporting company provide the engine type and horsepower rating for each engine, facilities may have multiple engines of the same type and rating. An optional “Engine ID” column, where companies could create custom Engine Record IDs similar to Company IDs discussed above, will allow both the reporting company and EPA to distinguish between similar engines.

Clarifications to the Oil Change Requirement in Subpart ZZZZ

GPA Midstream agrees that replacing the word “annually” in Subpart ZZZZ, Tables 2c and 2d adds clarity, however, requiring oil changes “every 12 months” reduces flexibility. We propose that the table provide owners and operators the option of changing oil “every X,XXX hours of operation or annually (but not to exceed 14 calendar months).” This language is similar to that used for stack testing under Part 60, Subpart KKKK. 40 C.F.R. § 66.4400(a). Interpreting “annually” to not exceed 14 calendar months avoids the scenario where “an oil change could hypothetically be conducted on January 1, 2019, and the next oil change could then be conducted on December 31, 2020,” taking place “almost exactly 2 years apart, minus a day.” 88 Fed. Reg. at 41,365. And allowing “annually” to exceed 12 calendar months preserves flexibility to ensure that oil changes occur within existing maintenance schedules.

EPA Should Avoid Duplicating State Reporting Requirements

State agencies have expended significant resources to develop reporting systems for delegated New Source Performance Standard and National Emission Standards for Hazardous Air Pollutant programs. For instance, Texas recently implemented STORS via STEERS and other states, such as Arkansas, Louisiana, and Oklahoma, have had their own electronic test reporting systems in place for several years. The proposed rule provides no explanation why duplicative electronic reporting to both the States and EPA is necessary or why reporting to delegated State agencies is otherwise inadequate. GPA Midstream requests that, where a State has an electronic reporting system in place, companies should be exempt for reporting on the same equipment to EPA through CEDRI.

EPA Should Provide One Year to Phase in ERT

Contractors used by GPA Midstream member companies have raised several concerns with using ERT, including burden and compatibility issues, and will need additional time to adapt to it. For instance, contractors have stated that, while ERT can accept data for standard methods 3A, 7E, 10, and 25A, that data must be manually processed. Significant development time is required by contractors to create tools for automatically importing data into ERT. Experience also shows that ERT cannot accept FTIR data, requiring operators to upload PDF reports. Converting data into a submission file that CDX/CEDRI can accept is a significant burden, especially considering the high volume of engine tests that contractors and operators must process.

GPA Midstream believes that contractors and operators will likely create tools to use ERT more efficiently, however, this will likely take longer than 180 days. It may also require adjustments to ERT so it may support additional test methods. Due to the need for developing additional tools, and potentially negotiate some improvements to ERT, we ask that EPA allow one year for compliance.

GPA Midstream appreciates the opportunity to submit these comments in response to EPA's proposal and is standing by to answer any questions that it may have.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matt Hite". The signature is fluid and cursive, with the first name "Matt" being more prominent than the last name "Hite".

Matt Hite
Vice President of Government Affairs
GPA Midstream Association