



October 13, 2026

U.S. Environmental Protection Agency
Office of Air and Radiation
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Washington, D.C. 20460

Submitted via www.regulations.gov

Re: Section 610 Review of Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Docket No. EPA-HQ-OAR-2025-3160

GPA Midstream Association (“GPA Midstream”) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (“EPA” or the “Agency”) on its review under Section 610 of the Regulatory Flexibility Act of the 2016 final rule *Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources* (the “2016 Rule” or “Subpart OOOOa”) (“RFA 610 Review”).¹ EPA announced the review in its 2026 Unified Agenda and requested comment on the rule’s continued need, nature of public comments and concerns, complexity, overlap with other requirements, and changes in technology, economic conditions, and other relevant circumstances.²

GPA Midstream has served the U.S. energy industry since 1921 and represents approximately 45 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as “midstream activities.” The work of our members indirectly creates or impacts an additional 470,000 jobs across the U.S. economy. In 2024, GPA Midstream members had an economic impact of \$191 billion through operating 502,900 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 342 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.

Section 610 directs EPA to consider whether a rule should be continued, amended, or rescinded to minimize significant economic impacts on small entities, consistent with

¹ 2026 Unified Agenda of Regulatory and Deregulatory Actions, 91 Fed. Reg. 53,054, 53,058 (Aug. 14, 2026); *Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources*, 81 Fed. Reg. 35,824 (June 3, 2016).

² 91 Fed. Reg. at 53,058.

applicable statutory objectives. 5 U.S.C. § 610(a). The review expressly considers regulatory complexity, overlap with other requirements, and changes in technology. *Id.* § 610(b).

These considerations are particularly relevant to Subpart OOOOa. Since 2016, the federal regulatory framework has expanded to include Subparts OOOOb and OOOOc alongside the existing OOOO and OOOOa programs. Although applicability differs by affected facility, EPA should consider the practical complexity of administering these requirements together with applicable state programs.

GPA Midstream's members have extensive experience implementing Subpart OOOOa at compressor stations, natural gas processing plants, and other midstream facilities. Drawing on that experience, GPA Midstream recommends that EPA take the following targeted steps to maintain effective emission control while reducing unnecessary compliance costs and to align technical provisions across subparts:

- Recognize advanced sealing technologies as alternatives to fixed rod-packing replacement intervals where equivalent emission reductions are demonstrated and provide practical approval pathways for those alternatives.
- Reassess gathering and boosting compressor-station fugitive monitoring using sector-specific operating data and current costs and simplify compliance coordination across applicable federal and state programs.
- Align outdated technical provisions under Subpart OOOOa with Subparts OOOOb and OOOOc, including requirements governing maximum flare tip velocity design and operation.

EPA should address these issues through existing alternative-compliance authorities and targeted amendments, as appropriate, coordinated with its broader reconsideration of Subparts OOOOb and OOOOc.

I. EPA Should Recognize Advanced Sealing Technologies as Alternatives to Fixed Rod-Packing Replacement Intervals.

Adjusting OOOOa to allow for advanced sealing technologies as an alternative to fixed replacement intervals would meet the goals of RFA 610 Review: reduce regulatory complexity, reduce unnecessary economic burdens, and recognize changes in technology.

Under 40 C.F.R. § 60.5385a(a), operators generally must replace reciprocating-compressor rod packing on or before 26,000 operating hours or prior to 36 months, depending on the compliance option selected. Alternatively, operators may collect rod-packing emissions under negative pressure and route them to a process through a qualifying closed vent system. *Id.* § 60.5385a(a)(1)–(3).

In the years since EPA promulgated OOOOa, advances have been made in technologies used to maintain the seal around a reciprocating-compressor piston rod. EPA should use this RFA 610 Review to review and recognize advanced sealing technologies that maintain equivalent methane and volatile organic compound (“VOC”) emission reductions over a demonstrated service interval. Where the supporting record establishes equivalence, operators should not also be required to replace functioning packing solely because a specified number of months or operating hours has elapsed, as OOOOa currently provides. An approved alternative should establish appropriate installation, operation, maintenance, and compliance-demonstration conditions for this technology. This would provide an alternative to the fixed replacement requirement that was designed to maintain previously established rod-packing techniques and preserve necessary maintenance to sustain emission-control performance, ensuring that the level of maintenance matches today’s technology.

For example, member feedback has identified an advanced technology described as a “dual lock rod seal” as an alternative to conventional rod packing. Sources could replace conventional packing with this advanced technology at compressors regulated under OOOO and OOOOa if EPA recognized it as a compliance alternative. Accordingly, we urge EPA to evaluate this technology and comparable advanced sealing technologies against the applicable equivalence criteria. GPA Midstream welcomes the opportunity to work with its members and equipment manufacturers to provide additional technical information, field-performance data, and implementation considerations to support that evaluation.

Subpart OOOOa already provides an approval mechanism. Section 60.5398a expressly authorizes EPA, after notice and an opportunity for a public hearing, to approve alternative means of emission limitation for reciprocating compressors that achieve at least equivalent methane and VOC emission reductions. EPA should use that authority to evaluate qualifying sealing technologies and consider targeted regulatory amendments where necessary to make approved alternatives practical to implement.

Where representative performance and durability data support use across a defined category of compressors and operating conditions, EPA should allow a common technical record to support approval for operators meeting those conditions, rather than require each operator to repeat the same demonstration. Establishing that common approval would advance a key purpose of RFA 610 Review: reducing unnecessary complexity in regulations.

Similarly, new technologies may reduce both costs and emissions merely by reducing rod-packing replacement scope and frequency. Hence, in evaluating these alternatives, EPA should consider avoided replacement-material and labor costs, compressor downtime, and associated compliance activities, with particular attention to smaller operators. The analysis should also consider how the new technology will avoid emissions associated with shutdowns undertaken solely to replace packing that continues to perform effectively. GPA

Midstream previously identified the operational and potential emissions consequences of shutdowns undertaken to address rod packing and requested workable repair and replacement procedures.³

II. EPA Should Reassess Compressor-Station Fugitive Monitoring and Simplify Compliance Coordination.

Subpart OOOOa generally requires quarterly fugitive-emissions surveys at affected compressor stations. 40 C.F.R. § 60.5397a(g)(2). GPA Midstream previously urged EPA to adopt annual monitoring at gathering and boosting compressor stations based on sector-specific leak data and operating costs. Our December 2018 comments reported an average initial component leak frequency of 0.24 percent across 262 sites operated by 11 companies, compared with EPA's then-assumed 1.18 percent.⁴

EPA should revisit that record using current data on component counts, leak frequency and magnitude, repair effectiveness, and monitoring costs at gathering and boosting stations. The analysis should compare the incremental emission reductions and costs of quarterly monitoring with annual or other less-frequent monitoring, rather than assume that conditions in other industry segments are representative. EPA should also consider whether stations demonstrating sustained low leak rates could qualify for reduced monitoring frequency under a performance-based approach. The assessment should specifically address the costs and implementation resources required of small entities.

EPA should also build on existing mechanisms for coordinating overlapping compliance programs. Section 60.5399a already provides a process for approving equivalent state, local, and tribal fugitive-emissions standards and identifies approved alternatives. EPA should evaluate whether additional programs qualify and whether clearer instructions would make existing approvals more usable. Where a survey or record satisfies the substantive requirements of more than one applicable program, EPA should allow it to demonstrate compliance without unnecessary duplication, while preserving each program's applicable coverage, methods, timing, repair, and documentation requirements.

Finally, EPA should coordinate any resulting OOOOa amendments with its broader reconsideration of Subparts OOOOb and OOOOc and explain how the revised requirements interact with applicable existing-source plans. Coordination should preserve the distinct applicability of each subpart and avoid conditioning use of an equivalent alternative on compliance with unrelated requirements.

³ GPA Midstream Association Comments, Docket No. EPA-HQ-OAR-2021-0317, at 45-47 (Feb. 13, 2023).

⁴ GPA Midstream Association Comments, EPA-HQ-OAR-2017-0483-1261, at 3-8 (Dec. 17, 2018); *GPA Midstream Association OOOOa White Paper Supplemental Information: Compressor Station Leak Rates Data Analysis* (May 17, 2018) (submitted to the U.S. Small Business Administration).

III. EPA Should Align Subpart OOOOa Flare Tip Velocity Requirements with Subparts OOOOb and OOOOc.

Subpart OOOOa currently requires flares to comply with the requirements 40 C.F.R. § 60.18(b), including its maximum flare tip velocity limitations. EPA subsequently recognized the technical challenges associated with applying these limits to pressure-assisted flares and, in Subparts OOOOb and OOOOc, expressly excluded such flares from the maximum flare tip velocity requirements. EPA should use this RFA 610 Review to address this inconsistency by amending Subpart OOOOa to align with this more recent approach and remove the maximum flare tip velocity requirements for pressure-assisted flares. This revision would address the documented technical complexities associated with these flares while ensuring consistency across related New Source Performance Standards requirements.

Conclusion

GPA Midstream respectfully requests that EPA use this review to identify targeted improvements to Subpart OOOOa, including evaluating qualifying alternative sealing technologies and aligning outdated technical requirements with Subparts OOOOb and OOOOc. These actions should maintain effective emission control while reducing unnecessary replacement costs, monitoring burdens, and duplicative compliance activities. GPA Midstream appreciates the opportunity to comment and looks forward to working with EPA on these issues.

Sincerely,



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