



## Environmental Auditing: Federal Air Quality MACT Standards for Upstream Oil and Natural Gas Processing

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### new & noteworthy

- **Crude Oil and Natural Gas Production Source Category Review Rule:** On October 27, 2020, the court dissolved its earlier administrative stay that prevented the rule from going into effect; however, the court continues to consider litigation challenging the rule. The guide has been updated with the requirements of this rule that were published on September 14, 2020 (85 FR 57018). The **New Source Performance Standards (NSPS) for the Upstream Oil and Gas Operations Rulebook** has been updated accordingly.
- **Crude Oil and Natural Gas Production Source Category Reconsideration Rule:** The guide has been updated with the revisions that were published on September 15, 2020, (85 FR 57398) that finalizes amendments to the new source performance standards (NSPS) for the oil and natural gas sector. The **New Source Performance Standards (NSPS) for the Upstream Oil and Gas Operations Rulebook** has been updated accordingly.
- **Legal Challenge Update:** A coalition of environmental organizations argued in the D.C. Circuit on November 13, 2020, for review of the Reconsideration Rule. The challenge asked the court to block EPA's reduction in leak monitoring frequency.

### highlights of this release

To incorporate amendments to the rules referenced above, a change was made to the **New Source Performance Standards (NSPS) for Upstream Oil and Gas Operations Rulebook**:

- The General Applicability Checklist, Regulatory Summary, Key Compliance Definitions, Appendix and Acronyms in the **Introduction** have been updated to include recent amendments to the Review and Reconsideration Rules.
- Sections 3 and 4 of Rulebook A, **New Source Performance Standards (NSPS) for Upstream Oil and Gas Operations**, have been revised to reflect amendments to the Review and Reconsideration Rules.

# release notes

*please review*

## did you know?

- **EPA updates the list of combustion control device models:** In November 2020, EPA updated its list of combustion control device models that have been tested by the manufacturer. EPA has indicated which models of control devices have achieved the combustion control device performance requirements in 40 CFR 60 Subparts OOOO and OOOOa, and 40 CFR 63 Subparts HH and HHH (see, [https://www.epa.gov/sites/production/files/2020-11/documents/mfr-tested\\_combustor\\_list\\_november\\_2020.pdf](https://www.epa.gov/sites/production/files/2020-11/documents/mfr-tested_combustor_list_november_2020.pdf)).



### related STP products

- **Onshore and Offshore Upstream Oil and Gas Operations: Federal Auditing Guide** is designed to be used to ensure effective regulatory compliance with the hundreds of complex Federal Department of Interior (DOI) environmental, health and safety (EHS) regulatory requirements facing businesses that explore for and extract oil and natural gas (referred to as “upstream oil and gas operations”). Available formats: online and via risk management systems.

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