Message

From: Cozzie, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EE8C3582A39D4D81AC38F29A2B3ABB2D-DCOZZIE]
Sent: 12/11/2017 5:20:00 PM
To: Thompson, Lisa [Thompson.Lisa@epa.gov]
Subject: FW: ATTN Docket ID Nos: EPA–HQ–OAR–2017–0346 & EPA–HQ–OAR–2010–0505
Attachments: 2017 12 08 API Comments on NSPS OOOOa NODA Final.pdf

Importance: High

From: Matthew Todd [mailto:ToddM@api.org]
Sent: Friday, December 08, 2017 4:25 PM
To: AirAction <AirAction@epa.gov>
Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Zenick, Elliott <Zenick.Elliott@epa.gov>; Page, Steve <Page.Steve@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>
Subject: ATTN Docket ID Nos: EPA–HQ–OAR–2017–0346 & EPA–HQ–OAR–2010–0505
Importance: High

The American Petroleum Institute submitted the attached comments via www.regulations.gov regarding the notices of data availability in support of EPA's New Source Performance Standards ("NSPS") 40 C.F.R. Part 60 Subpart OOOOa, "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements" 82 Fed. Reg. 51,788 and 82 Fed. Reg. 51,794 (both dated November 8, 2017).

Throughout the development of the oil and gas NSPS rulemaking, API has maintained a collaborative working relationship with Agency staff to provide operational and emissions data to inform the developments of these important rules. During this time, our objective has remained the identification of cost-effective emission control requirements that reduce VOC emissions for new sources and, as a co-benefit, also reduce methane. API encourages EPA to proceed with its review and revision of the underlying rule as expeditiously as possible, based on sound science and economics, considering the operational and technical issues that have already been raised in comments and litigation. API supports extension of compliance deadlines as the Agency completes this review.

Sincerely,

Matthew Todd

Matthew Todd
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