

## Alaska Oil and Gas Association

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121 W. Fireweed Lane, Suite 207  
Anchorage, Alaska 99503-2035  
Phone: (907) 272-1481 Fax: (907) 279-8114  
Email: [williams@aoga.org](mailto:williams@aoga.org)  
*Kate Williams, Regulatory and Legal Affairs Manager*

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Air and Radiation Docket and Information Center  
U.S. Environmental Protection Agency  
Mailcode: 6102T, 1200 Pennsylvania Ave. NW.  
Washington, DC 20460

**Re: Comments on Proposed Amendments to RICE NESHAP, Docket ID No. EPA-HQ-OAR-2008-0708**

Dear Docket Clerk:

The Alaska Oil and Gas Association (AOGA) appreciates the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) proposed rule entitled National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines and New Source Performance Standards for Stationary Internal Combustion Engines. The proposed rule amends 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart JJJJ and Subpart IIII. AOGA is a nonprofit business trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. AOGA's membership includes 16 companies representing the breadth and scope of the industry in Alaska, that have state and federal interests across the state, both onshore and offshore.

AOGA endorses the comments on the proposed rule being submitted by the American Petroleum Institute (API) and encourages EPA to consider and incorporate the suggestions contained therein. We would like to emphasize the following issues in API's comments.

AOGA supports the terms of the settlement agreement and believes the proposed rule is consistent with the agreement. In particular, we support:

- Maintenance-based management practices for existing spark ignited area source four-stroke cycle engines greater than 500 horsepower in remote locations;
- Alternative compliance demonstration options for existing four-stroke area source engines less than 500 horsepower; and
- Total hydrocarbon (THC) as an alternative to formaldehyde measurement for compliance verification for 4-stroke rich burn engines complying with catalyst percent reduction requirements

The comments below provide suggested clarifications on certain issues addressed in the settlement agreement. These clarifications are offered as ways to improve the proposed rule and do not

constitute disagreement with any aspect of the settlement agreement or any objection to the rule that EPA proposed to implement in the agreement.

- AOGA supports the inclusion of a remote engine subcategory, but suggests that the definition of remote engine be clarified to specifically address owner-operator onsite buildings.
- AOGA supports broadening and clarifying the definition of remote area sources of Alaska in the RICE NESHAP including a definition change that designates Cook Inlet, Alaska RICE as remote engines.
- To simplify the ongoing annual assessment of whether remote status changes, AOGA requests a revision to §63.6603(e) that allows remote engines located on a pipeline segment to be able to use the ¼ mile radius approach in the §63.6675 definition item (3) when annually re-evaluating status (i.e., for annual status reviews subsequent to the initial determination).
- EPA solicited comment on “whether special consideration should be given to engines whose requirements would be reduced by this proposal if, in the final rule, the EPA does not finalize the proposed reduced requirements.” AOGA supports retaining the proposed requirements. Significant compliance issues will need to be addressed if this is not the case.
- For the area source engine catalyst test required in §63.6630(e) and §63.6640(c), the requirement to conduct simultaneous pre- and post-catalyst tests in §63.6630(e)(6) and §63.6640(c)(6) should be eliminated.
- The remote engine subcategory maintenance-based management practices should also be applied to offshore diesel engines. AOGA believes it is reasonable to apply the same rationale for SI RICE to offshore CI engines located in areas remote from human activity.
- For engines subject to oil change maintenance practices, operators that use an oil analysis program as defined in §63.6625(i) should be allowed at least 7 days to complete an oil change. AOGA believes one week is a reasonable amount of time for this work.

Finally, AOGA also supports the regulatory text provisions proposed by API and included as part of their comments on the proposed rule.

The oil and gas industry in Alaska has a long history of partnership with EPA to help ensure that oil and gas operations do not adversely impact the environment, and we look forward to continuing this productive relationship into the future. If you have any questions regarding AOGA’s comments, please do not hesitate to contact me.

Sincerely,



KATE WILLIAMS

Regulatory and Legal Affairs Manager