

Environmental Newsletter

4/11/2022

**TECHNICAL
EXPERTISE**
Brought
Into **FOCUS** by
**INDUSTRY
LEADERS**

All,

Big thanks to everyone who participated in the committee meeting either in Galveston or via teams. Hopefully the power point presentation will provide clarification on several items the committee is currently tracking. As always if anyone has any comments or questions, please do not hesitate to reach out to me.

House Keeping

Website Information: NACM has plans in the work to update the website finally and I have been tasked with creating a Wishlist of updates. If anyone has ideas or interested in being copied on the email that goes to NACM with this information please let me know and I'll be happy to include you.

Training/ Presentations:

Project No. 1: The in-person meeting generated some really great conversation surrounding potential training and presentation initiatives. I will be reaching out to key members on the committee soon to discuss a potential "Environmental Challenges – Collaborative Project," presentation for the Expo and Convention next year. This presentation will encompass environmental challenges faced by all in a non-competitive setting to be delivered to potential vendors and other members having innovative solutions.

Project No. 2: The environmental committee has a vast amount of technical expertise on equipment that impacts emissions. Creating smaller regulatory and administrative process emissions updates for our committee members is key in being an effectual committee. This initiative will help our members get up to speed on the regulatory side so that they can serve their respective company better. Hopefully this program will be the foundation of a future "Speed Topics," type series the GCA can endorse.

GCA Environmental Committee

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Proposal Summary

Brian Kromer of Step2 Compliance was kind enough to provide a brief summary of what Step2 Compliance can provide the GCA Environmental Committee.

After the close of the Teams meeting all in-person committee members engaged in a healthy debate of the pros and cons of utilizing Step2 Compliance. Should anyone have any questions, comments, or concerns about any of those please feel free to reach out.

At this time Mr. Kromer has been asked to provide a more detailed services and cost document that will be presented to the committee via myself on or before June 16, 2022. As mentioned above, June 16, 2022, we will have a technical meeting in Frisco, TX. At that meeting I will present the options Mr. Kromer has provided and then open the floor to discussion amongst members. After the close of that discussion any member that is physically present will have the opportunity to vote on presenting this offer to the Executive Board Leadership of the GCA.

Pros

1. Membership Generation
2. Rule Adoption Notices
3. Potential Annual Emissions 101 Presentation
4. Membership unity in compliance software

Cons

1. Rule interpretation discrepancy
2. Rule Adoption vs. Rule Proposal Notices and Timing
3. Cost
4. Committee Representation vs. Outside Consulting Representation

NSPS UPDATE

All,

I have included the technical summary in this email for reference, however I believe everyone has had an opportunity to review at this point. After some deliberations the last two weeks it has been decided that the GCA will be providing comment to the NSPS OOOO rulemaking. To provide as robust of comments possible starting this initiative early is paramount. Below I have outlined the beginnings of a wish list of comments to be addressed.

To build a thorough structure for comments I was hoping to create a subcommittee focused on a singular topic. All interested parties please email me. Please understand this comment wish list is still in the beginning stages and is by no means complete as of now – all input is highly encouraged.

1. Requesting guidance of how the EPA is proposing to interpret owner or operator responsibilities.
2. Explaining the overly burdensome tracking of pneumatic device serial numbers and date of manufacture.
3. Asserting a position on the use of NSPS OOOOb testing methodology for NSPS OOOOa applicable equipment due to retroactive definition change.
4. Provide a technical view on testing methodology, to hopefully be used in a Testing Protocol. ***Anyone with a point of contact at Testo or Ecom please email me.***
5. Establishing legal basis for the NSPS OOOOc overreach.



Important Links

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/epa-proposes-new-source-performance>

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/epa-host-trainings-november-16-18-2021-epas>

<https://www.epa.gov/newsreleases/us-sharply-cut-methane-pollution-threatens-climate-and-public-health>

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry>

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/basic-information-about-oil-and-natural-gas>

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/actions-and-notices-about-oil-and-natural>

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air>

Colorado Climate Action Plan to Reduce Pollution –

Colorado state agencies are hosting workshops across the state to hear from community members about their ideas, concerns, and priorities for Colorado's plans to address climate change, improve air quality, and expand access to affordable clean energy. Dinner will be provided, and all participants will receive a \$75 Visa gift card, as a thank you for their time and input.

Colorado's GHG Pollution Reduction Roadmap was developed in 2019 with input from a wide variety of stakeholders. Successful implementation of the roadmap and other opportunities including the federal infrastructure bill and state air quality package present unprecedented opportunities for Colorado communities to receive funding, technical support, and access to state policies and programs to accelerate an equitable transition to clean energy.

CDPHE is hosting a workshop in the Aurora Center for Active Adults (at 30 W Del Mar Circle) from 5:00 p.m. to 8:00 p.m. on Wednesday, April 27. Currently these workshops are by invitation only because space is limited and we are especially wanting to hear from community members in the region and historically underrepresented groups.

Registration Deadline Friday, April 15, 2022.

*****PLEASE NOTE THIS IS BY INVITATION ONLY, SHOULD YOU WANT TO BE INCLUDED IN THESE MEETINGS PLEASE SEND ME AN EMAIL AND I CAN RECOMMEND YOU TO THE CDPHE.**

Colorado ALERT



If you are unable to attend this workshop, you are welcome to register for one of the Zoom workshops, which will be held on June 16th and June 22nd from 5:30-7:30pm.

(Note: participants of virtual workshops will receive \$45 Visa gift cards as a thank you.) You can select one of these virtual workshops in the same registration form.

The full workshop series will include:

April 27 - Aurora

May 19 - Greeley

May 25 - Pueblo

June 1 - Trinidad

June 2 - Lamar

June 8 - Delta

June 9 - Durango

June 16 and 22 - Remote meetings for anyone in CO

For the latest information on this process, please visit: <https://cdphe.colorado.gov/air-pollution/climate-change#CleanHeat>