

Regulatory Standards for Methane Emissions

October 2022

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CLEAN AIR
TASK FORCE

Federal Regulations

EPA

- OOOOb/c
 - Zero bleed pneumatic controller requirement
 - Frequent and routine LDAR at all facilities (without loopholes)
- GHGRP
 - Many changes in the GHGRP have been long awaited and EPA should finalize.

IRA/MERP

- Works with EPA rules to significantly and quickly reduce methane emissions
- However, any finalized updates flowing from the current GHGRP update do not, and cannot, satisfy EPA's obligation to revise Subpart W as required under MERP.
- Empirical requirement should draw from Veritas or other similar programs

Incorporating New Technologies into Regulations

- Policies should will incentivize new technologies and not “lock in” old technologies, particularly for LDAR.
 - proven technologies
 - protective requirements for determining the capability of those technologies to achieve the targeted minimum detection thresholds.
 - incentivize innovation by allowing operators to submit new technologies and approaches that can achieve the performance equivalent to OGI standards.
- Colorado intensity-based program
 - Important to get it right, model for other jurisdictions.
 - Reporting and Verification key for legitimacy and public accncepta