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**From:** Lee Fuller [fuller@ipaa.org]  
**Sent:** 7/11/2017 5:48:36 PM  
**To:** Bolen, Brittany [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31e872a691114372b5a6a88482a66e48-Bolen, Brit]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]  
**Subject:** Use of Oil and Natural Gas Production Control Techniques Guidelines for 2008 Ozone NAAQS SIPs

Brittany, Mandy,

When we met with Administrator Pruitt, one of the issues that we raised related to the October 2016 Control Techniques Guidelines (CTG) for existing sources of oil and natural gas production facilities in ozone nonattainment areas. These CTG are existing source requirements that should be based on a Reasonably Available Control Technology (RACT) determination but were essentially replicating the Subparts OOOO and OOOOa Best System of Emissions Reductions (BSER) New Source Performance Standards (NSPS) requirements. Because the Subparts OOOO and OOOOa NSPS requirements are in the process of being reconsidered, IPAA recommended that EPA consider suspending or withdrawing the CTG until the issues related to Subparts OOOO and OOOOa are resolved.

Recent state actions involving State Implementation Plans (SIPs) utilizing the CTG make a decision by EPA more compelling.

In Colorado, the state is developing a SIP to meet the 2008 Ozone National Ambient Air Quality Standard (NAAQS). One area is being classified as moderate and thereby requires the implementation of Reasonably Available Control Measures (RACM). Because RACM mandates that all CTG must be included as RACM, the October 2016 oil and natural gas production facilities CTG is included in this SIP development. I have attached some materials submitted to the state regulatory agency raising concerns about the inclusion of the CTG.

Similar activity is underway in Pennsylvania although I do not have details on it. However, because Pennsylvania is part of the Ozone Transport Region (OTR), I believe it must use RACM statewide and the October 2016 CTG would now become a part of the RACM pool of regulations.

Please let me know if I can provide additional information.

Thanks,

Lee Fuller