



Online Filing: <http://www.regulations.gov>

Docket No. EPA-HQ-OAR-2018-0048

October 8, 2019

Ms. Anne Idsal
Acting Assistant Administrator for Air and Radiation
Mail Code 6101A
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: AGA Comments on Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR): Project Emissions Accounting Proposed Rule, 84 Fed. Reg. 39244 (August 9, 2019)

Dear Acting Assistant Administrator Idsal:

The American Gas Association (AGA) submits these comments to support EPA's proposal to revise the New Source Review (NSR) applicability regulations to clarify the procedure for determining whether a proposed physical or operational change (project) at a major stationary source would result in a significant net emissions increase under the NSR preconstruction review program.

The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 74 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — more than 71 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies and industry associates. Today, natural gas meets more than one-fourth of the United States' energy needs.

AGA members would be directly affected by the proposed regulatory change. Some of our member companies operate natural gas transmission pipeline or underground storage compressor stations that are sufficiently large to be major stationary sources for one or more criteria pollutants, and the proposal would help reduce burdens and delays in modernization projects, such as upgrading compressor engines or turbines. In addition, all our members rely on interstate natural gas pipelines to obtain reliable, affordable natural gas supply to serve their industrial, commercial and residential customers across the United States. The proposal will help interstate pipelines supply our members more cost-effectively and reliably.

AGA has long advocated for clarifying and streamlining the procedures for determining whether a proposed project would result in a net emissions increase triggering pre-construction review and permitting under the NSR applicability regulations, filing comments in 2001¹ and 2006.²

AGA strongly supports the agency's proposed revisions to the applicability provisions in 40 C.F.R. § 52.21(a)(2)(iv)(f) to clearly state that emissions increases and decreases from existing and new emission units may be considered in Step 1 to determine whether a modification project would result in an emission increase. It is a logical approach that aligns with the approach already taken for evaluating emissions increases and decreases for projects that involve only new or only existing units. We agree that this represents sound policy that will remove a disincentive for moving forward with projects that can help reduce emissions that might otherwise be delayed, and it will create an incentive to seek additional opportunities to reduce net project emissions. This is truly a win-win, benefiting the environment while also facilitating the reliable and affordable delivery of natural gas to businesses and homeowners across the country.

In comments filed in this docket, the Interstate Natural Gas Association of America (INGAA) supported EPA's proposed revisions and requested that EPA provide additional guidance and clarification regarding the scope of activities that may be included in a project for purposes of step 1 of the NSR applicability determination. AGA agrees and supports INGAA's comments filed today in this docket.

¹ AGA July 25, 2001 Comments on EPA's "NSR 90-Day Review Background Paper," 66 Fed. Reg. 34191 (June 27, 2001); AGA Nov. 14, 2001 Comments on EPA's October 15, 2001 Draft Guidance Memorandum "Source Determinations for Combined Heat and Power Facilities under the Clean Air Act New Source Review and Title V Programs" Notice of Availability 66 Fed. Reg. 52403 (Oct. 15, 2001)..

² Nov. 13, 2006 Comments of the American Forest & Paper Association, the American Gas Association, the American Iron and Steel Institute, the Portland Cement Association, and the Rubber Manufacturers Association on EPA's Proposed NSR Rule on Debottlenecking, Aggregation, and Project Netting, 71 Fed. Reg. 54235 (September 14, 2006), Docket I.D. No. EPA-HQ-OAR-2003-0064.

Comments of the American Gas Association
October 8, 2019
Docket EPA-HQ-OAR-2018-0048

AGA appreciates the opportunity to comment. If you have any questions, please contact me.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pamela A. Lacey". The signature is written in a cursive style with a large initial "P".

Pamela A. Lacey
Chief Regulatory Counsel
American Gas Association
400 N. Capitol St., NW
Washington, DC 20001
202.824.7340
placey@aga.org