

REGULATORY UPDATE

MARCH 2024



SPIRIT
ENVIRONMENTAL

OIL & GAS AIR RULES

- Final NSPS OOOOb (new sources) and OOOOc (existing sources) rules in March 8 Federal Register
- “Super-emitters”
 - At least 100 kg methane per hour
 - 3rd party detection (e.g., satellite, aircraft, mobile monitoring)
- Legally & practically enforceable controls on tanks → impacts on applicability & permitting
- Pneumatics with zero emissions
- Only flare gas as a last resort



Ask **Scott Hyden**
or **Andrew Parisi**



NEW PM_{2.5} STANDARD

- Final NAAQS published in March 6 Federal Register; effective May 6
- Annual standard tightened by 25%, from 12 µg/m³ down to 9 µg/m³
- Many areas (e.g., HOU, DFW, Austin) do **not** meet the new standard
- States will have 1 year to propose nonattainment designations
- 24 states have *already* sued EPA
- Pending and future air permits & associated air dispersion modeling will be more difficult

To learn more, contact
Shagun Bhat



SEC CLIMATE RULE

- Adopted rules requiring greenhouse gas (GHG) emission and climate risk management disclosures by public companies on March 6
- (Large) Accelerated Filers must report both material Scope 1 (direct) **and** Scope 2 (energy used)
- **Not** required to report Scope 3 (those generated from other parts of the value chain) emissions
- Will require assurance of emissions
- Forthcoming in Federal Register

To learn more, contact
Conor Merrigan



REVISED RMP RULE

- Pre-publication version of revised rule was released March 1
- Subject sites must perform a Safer Technology Alternatives Analysis **and** must adopt at least one
- Independent third-party audits will be required for some sites
- Expand hazard review to consider climate change/extreme weather
- EPA is creating a new online tool for sharing public information
- Forthcoming in Federal Register

To learn more, contact
Roberto Gasparini

