



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

November 14, 2016

«CONTACT\_NAME»  
«CorporateName»  
«ADDRESS1»  
«CITY», «STATE» «ZIP»

Dear «Salutation»:

As required under section 114 of the Clean Air Act (CAA), the Environmental Protection Agency (EPA) is requesting that you provide the information described in this letter. This Information Collection Request (ICR) is being conducted by the EPA Office of Air and Radiation (OAR) to assist the EPA Administrator in developing emission standards for oil and gas facilities pursuant to section 111 of the CAA. The EPA requests that you complete the ICR as described in this letter for «FacilityName». Section 114(a) of the CAA states, in pertinent part:

For the purpose...(iii) carrying out any provision of this Chapter...(1) the Administrator may require any person who owns or operates any emission source...to- . . .(D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical... (G) provide such other information as the Administrator may reasonably require.

In January 2015, as part of the Obama Administration's commitment to addressing climate change, the EPA outlined a number of steps it plans to take to address methane and smog-forming volatile organic compound (VOC) emissions from the oil and gas industry, in order to ensure continued, safe and responsible growth in U.S. oil and natural gas production. As part of this effort, the EPA proposed and finalized New Source Performance Standards for the oil and gas industry to achieve both methane reductions and additional VOC reductions beyond those established in 2012. The EPA has also committed to develop standards of performance for existing oil and gas sources. This information collection request is necessary to develop nationally applicable regulations to reduce methane emissions from oil and gas sources.

You have been selected to complete the Part 2 detailed facility survey. You must complete the Part 2 survey for «FacilityName». Please complete and submit the Part 2 survey within 180 days of receipt of this letter.

**Your Assigned Facility ICR ID is «ICR\_ID».**

**Your e-GGRT invitation code is «INVITATION\_CODE».**

The EPA's legal authority to obtain the information requested in the survey is contained in section 114 of the CAA, as amended (42 U.S.C. §7414). In addition to providing this statutory language above in this letter, Enclosure 2 contains a summary of this authority.

If you believe that providing any specific information to us would reveal a trade secret, or would compromise confidential business information (CBI), please identify this information clearly in your response and submit your response as detailed in the next section. Also, please clearly label any flow diagrams or other attachments submitted with your survey that contain CBI. However, please do not label your entire response as CBI if only a portion includes trade secrets. The EPA is likely to follow up with a request for validation of CBI claims for facilities claiming large amounts of information as trade secret, especially information that is readily reported by other facilities without such claims. Any information that is claimed confidential will be handled in accordance with section 114(c) of the CAA and the EPA's CBI regulations at 40 CFR part 2, subpart B. If no claim of confidentiality accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice pursuant to EPA regulations at 40 CFR 2.203. Submitted information not claimed confidential or determined to be non-confidential will be made available to the public in accordance with CAA section 114(c) and the EPA's CBI regulations. Further, Clean Air Act (CAA) section 114(c), 42 U.S.C. § 7414(c), requires that emission data be made available to the public. A clarification of what the EPA considers to be emission data is contained in Enclosure 3.

We have contracted Research Triangle Institute (RTI) (Contract No. EP-D-11-084) to help us gather information about your oil and gas facility, to conduct the survey, and analyze the survey data. As noted in Enclosure 4, we have designated RTI to be our authorized representative. Therefore, RTI has the same rights discussed above and in Enclosure 2. This means that RTI will have access to all information provided to us in your completed survey, sampling results, and emissions test results. As a designated representative of the Agency, RTI is subject to the provisions of 42 U.S.C. §7414(c) respecting confidentiality of methods or processes entitled to protection as trade secrets.

Enclosure 5 summarizes our policies and procedures for handling trade secret and CBI, and describes how our contractor also is required to use the same procedures as we do. Because our contractors or other authorized representatives are required to follow the requirements in Enclosure 5, we believe that we can ensure your rights and protect any privileged information you submit to us.

Questions regarding this information request should be directed to Ms. Brenda Shine at (919) 541-3608 or [shine.brenda@epa.gov](mailto:shine.brenda@epa.gov).

I am sure you understand how vital it is for the EPA to use the very best information available to develop the most meaningful standards. Your help in providing this information is greatly appreciated.

Sincerely,



Peter Tsirigotis

Director, Sector Policies and Programs Division  
Office of Air Quality Planning and Standards

5 Enclosures

- Enclosure 1: Instructions for the Oil and Gas Information Collection Request
- Enclosure 2: EPA's Information Gathering Authority (Under Section 114 of the CAA)
- Enclosure 3: Clarification of what EPA considers to be emissions data
- Enclosure 4: Summary of contractor's authority as representative of EPA
- Enclosure 5: Procedures for safeguarding CBI under the CAA

cc: «State\_All» (without enclosures)

«Region\_all» (without enclosures)