

## **Summary of New Certification and Leak Detection Requirements**

### Closed vent system design certification requirement:

- Direct result of ongoing CAA enforcement activities
- Applies to each closed vent system used to route emissions from an affected facility to a control device or process
- An assessment must be conducted to demonstrate that both the closed vent system and control device are designed and sized appropriately, and also certified by a Professional Engineer (PE)

### Fugitive emissions monitoring requirements for well sites and compressor stations:

- The new fugitive emissions survey requirements are not performance based; surveys must be performed at fixed intervals
- Two allowable methods for initial fugitive leak detection: optical gas imaging and handheld FID or PID meeting federal RM 21 requirements
- A "fugitive monitoring plan" must be developed and must address specific requirements such as monitoring equipment performance criteria and operator training
- Each well site or compressor station constructed or modified after September 18, 2015, must have an initial fugitive emission survey performed within 60 days or by June 3, 2017 (whichever is later)
- Well sites are subject to a semiannual resurvey requirement, and compressor stations are subject to a quarterly resurvey requirement
- The new federal requirements do not necessarily dovetail with current state requirements