NSPS OOOOa/OOOOb Program Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
40 CFR Part 60, Subpart OOOOa — Standards of Performance for Crude Oil and Natural Gas Facilities (2016)
40 CFR Part 60, Subpart OOOOb — Standards of Performance for Crude Oil and Natural Gas Facilities (2024)
40 CFR Part 60, Appendix K — Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging
EPA Final Rule (March 8, 2024) — Oil and Natural Gas Sector Climate Review (89 FR 16820)
EPA 2025 Compliance Deadline Extensions — Interim Final Rule (OOOOb/c)
EPA Oil and Natural Gas Implementation Guidance and CEDRI Reporting
EPA 2024 Small Business Compliance Guide for NSPS OOOOb (PDF)
EPA Actions and Notices — Oil and Natural Gas Air Pollution Standards

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Program Documentation and Applicability

Audit Item	Expected Finding	Status	Notes / Evidence
Applicability determination	Facility has documented which subpart (OOOOa or OOOOb) applies to each affected source category based on construction, modification, or reconstruction date. Sources constructed/modified after September 18, 2015 through December 6, 2022 are under OOOOa; after December 6, 2022 under OOOOb. » *Ref: 40 CFR 60.5365a / 60.5365b*		
Affected facility inventory	Complete inventory of all affected facilities including well sites, centralized production facilities, compressor stations, storage vessels, pneumatic controllers, pneumatic pumps, and process equipment. Each entry identifies applicable subpart and affected facility status. » *Ref: 40 CFR 60.5365a(a)-(j) / 60.5365b(a)-(j)*		

Audit Item	Expected Finding	Status	Notes / Evidence
EPA ID and registration	Facility is properly registered with EPA. Notifications have been submitted as required per 40 CFR 60.5420a or 60.5420b within the required timeframes (60 days of initial startup for OOOOa; per applicable provisions for OOOOb). » *Ref: 40 CFR 60.5420a(a) / 60.5420b(a)*		
Written compliance program	Documented compliance program covers all affected sources and applicable requirements. Program identifies responsible personnel, monitoring schedules, recordkeeping procedures, and reporting deadlines. Program is accessible to all operating personnel. » *Ref: 40 CFR 60.5397a / 60.5397b [best practice]*		
Modification tracking	Process exists to evaluate whether physical or operational changes constitute a modification triggering OOOOb applicability. Modification determinations are documented and retained. Threshold criteria (e.g., emissions increase, process change) are understood by operations staff. » *Ref: 40 CFR 60.14, 60.5365b(e)(3)*		

Fugitive Emissions and LDAR Program

Audit Item	Expected Finding	Status	Notes / Evidence
LDAR program coverage	All fugitive emissions components at affected well sites, centralized production facilities, and compressor stations are included in the monitoring program. Component inventory is maintained and updated as equipment changes. Exempt sources are properly documented. » *Ref: 40 CFR 60.5397a(a)-(b) / 60.5397b(a)-(b)*		
OGI survey frequency	OGI surveys are conducted at required frequency. OOOOa: semiannual for well sites and compressor stations. OOOOb: tiered based on facility type — semiannual for multi-wellhead sites, quarterly for compressor stations, with biennial available for demonstrated low-emitting sites. Survey due dates are tracked and met. » *Ref: 40 CFR 60.5397a(f)-(g) / 60.5397b(c)-(g)*		
AVO inspections	Audible, visual, and olfactory (AVO) inspections are conducted at required intervals between OGI surveys. OOOOb requires quarterly AVO for single wellhead-only sites and between OGI surveys for other facility types. AVO findings are documented and follow-up actions recorded. » *Ref: 40 CFR 60.5397b(c)(1), (d)(1), (e)(1)*		
OGI camera operation	OGI equipment meets specifications per 40 CFR 60, Appendix K (OOOOb) or 60.5397a (OOOOa). Camera operators have completed required training. Daily instrument functionality checks are documented. OGI survey parameters (wind speed, ambient temperature, viewing distance) are recorded. » *Ref: 40 CFR 60 Appendix K / 60.5397a(c)*		
Leak repair tracking	Identified leaks are tagged, photographed (digital photo with date and location), and documented		

Audit Item	Expected Finding	Status	Notes / Evidence
	immediately upon discovery. Repairs are initiated within required timeframes (30 days for OOOOa/OOOOb multi-well sites, 15 days for OOOOb single-well sites). Repair completion is verified by follow-up OGI within required period. » *Ref: 40 CFR 60.5397a(h) / 60.5397b(h)-(j)*		
Delay of repair documentation	Any repair delays beyond the initial repair period are properly documented with technical justification. Delayed repairs are tracked to next shutdown or turnaround opportunity or within two years of detection, whichever is sooner. Delay of repair inventory is maintained and reviewed. » *Ref: 40 CFR 60.5397a(h)(4) / 60.5397b(j)*		
Monitoring plan	Written monitoring plan defines the monitoring path, component identification methodology, and procedures for conducting OGI and AVO surveys at each facility. Plan addresses site-specific conditions including difficult-to-monitor and unsafe-to-monitor components. » *Ref: 40 CFR 60.5397a(c)-(d) / 60.5397b(b)*		

Storage Vessels

Audit Item	Expected Finding	Status	Notes / Evidence
Emissions determination	Potential VOC and methane emissions are calculated for each storage vessel or tank battery using accepted methodology. OOOOa threshold: ≥6 tpy VOC. OOOOb threshold: ≥6 tpy VOC or ≥20 tpy methane (based on aggregate tank battery emissions). Calculations are documented and retained. » *Ref: 40 CFR 60.5395a / 60.5395b, 60.5365b(e)*		
Control requirements	Storage vessels exceeding applicable thresholds achieve required emission reduction: 95% for both OOOOa and OOOOb. Control devices (vapor recovery units, enclosed combustors, flares) are properly sized, installed, and operational. Continuous compliance is demonstrated. » *Ref: 40 CFR 60.5395a(a) / 60.5395b(a)*		
Tank battery definition	OOOOb defines storage vessel affected facilities based on aggregate tank battery emissions (not individual vessels). Tank battery groupings are properly determined. All storage vessels in a battery sharing manifolded vapor space are included in the emissions calculation. » *Ref: 40 CFR 60.5430b (definitions)*		
Low-production exemption	Where applicable, facilities claiming the low-production exemption have demonstrated uncontrolled actual VOC emissions below 4 tpy and methane below 14 tpy for 12 consecutive months. Monthly monitoring records support the exemption. Re-evaluation trigger criteria are understood. » *Ref: 40 CFR 60.5395a(a)(3) / 60.5395b(a)(3)*		
Closed vent system integrity	Closed vent systems routing storage vessel vapors to control devices are inspected per		

Audit Item	Expected Finding	Status	Notes / Evidence
	required schedule. Systems are designed and operated with no detectable emissions. Initial and ongoing inspections verify no leaks. Defects identified during inspections are repaired within required timeframes. » *Ref: 40 CFR 60.5411a / 60.5411b*		

Pneumatic Controllers and Pumps

Audit Item	Expected Finding	Status	Notes / Evidence
Controller inventory	All pneumatic controllers are inventoried with type (continuous bleed, intermittent, zero-emission), bleed rate, and applicable subpart. Location of each controller is documented. » *Ref: 40 CFR 60.5390a / 60.5390b*		
OOOOa compliance	Pneumatic controllers at OOOOa-affected facilities operate with a bleed rate ≤6 scfh (natural gas processing plants) or are low-bleed. High-bleed controllers have been replaced or retrofitted. Functional necessity documentation exists for any controllers exceeding the bleed rate limit. » *Ref: 40 CFR 60.5390a(a)-(c)*		
OOOOb zero-emission requirement	Pneumatic controllers constructed/modified after December 6, 2022 are non-emitting (air-driven, electric, or routed to a closed vent system and control device). Zero-emission conversion or installation is documented. Any exemptions for technical infeasibility are properly justified and documented. » *Ref: 40 CFR 60.5390b(a)*		
Pneumatic pump compliance	Pneumatic pumps at affected facilities meet applicable emission reduction requirements. OOOOa: 95% reduction for pumps at processing plants. OOOOb: applicable reduction requirements for pumps based on facility type. Natural gas-driven diaphragm pumps are evaluated and controlled as required. » *Ref: 40 CFR 60.5393a / 60.5393b*		

Compressors

Audit Item	Expected Finding	Status	Notes / Evidence
Reciprocating compressor compliance	Reciprocating compressors replace rod packing before exceeding 26,000 hours of operation or 36 months since last replacement, or route emissions to a process or control device. Operating hour meters or replacement schedules are maintained and documented. » *Ref: 40 CFR 60.5385a(a) / 60.5385b(a)*		
Centrifugal compressor compliance	Centrifugal compressors with wet seal systems reduce emissions by 95% using a control device or route emissions to a process. Dry seal centrifugal compressors are exempt from control requirements but must be documented as dry seal.		

Audit Item	Expected Finding	Status	Notes / Evidence
	» Ref: 40 CFR 60.5380a(a) / 60.5380b(a)		
Compressor station LDAR	Compressor stations are included in the fugitive emissions monitoring program at required frequency. OOOOa: semiannual OGI. OOOOb: quarterly OGI for gathering and boosting and transmission and storage compressor stations. All fugitive emission components within the station boundary are surveyed. » Ref: 40 CFR 60.5397a(a) / 60.5397b(e)-(f)		

Well Completions and Associated Gas

Audit Item	Expected Finding	Status	Notes / Evidence
Green completion requirements	Hydraulically fractured or refractured oil and gas wells use reduced emission (green) completions. Completion combustion devices capture or combust all flowback gas not sent to the sales line. Pit flaring during completions meets all applicable requirements. » Ref: 40 CFR 60.5375a / 60.5375b		
Associated gas management (OOOOb)	OOOOb facilities comply with the phase-out of routine flaring of associated gas from new oil wells. Associated gas is captured, routed to sales, reinjected, or used on-site. Flaring allowance periods and volume limits are tracked and documented per the transition schedule. » Ref: 40 CFR 60.5375b(f)		
Completion records	Well completion reports document dates, duration, gas volumes captured and flared, equipment used, and compliance method. Records are maintained for each completion event and retained for the required period. » Ref: 40 CFR 60.5420a(c)(1) / 60.5420b(c)(1)		

Control Devices and Combustion

Audit Item	Expected Finding	Status	Notes / Evidence
Flare requirements	Flares used for emission control meet design and operational requirements. Pilot flame is continuously maintained with monitoring (thermocouple or equivalent). OOOOb: flares comply with net heating value of combustion zone (NHVcz) monitoring requirements. Visible emissions are minimized. » Ref: 40 CFR 60.5413a / 60.5413b		
Enclosed combustion devices	Enclosed combustion devices (vapor combustors, thermal oxidizers) achieve required destruction efficiency (≥95% for VOC/methane). Performance tests are conducted per required schedule. Continuous monitoring of operational parameters is maintained. » Ref: 40 CFR 60.5413a(b) / 60.5413b(b)		
Vapor recovery units	Vapor recovery units (VRUs) achieve required capture and control efficiency. VRU operational uptime is tracked and downtime events are		

Audit Item	Expected Finding	Status	Notes / Evidence
	documented. Back-up control (flare or enclosed combustor) is available during VRU downtime. » Ref: 40 CFR 60.5412a / 60.5412b		
Covers and closed vent systems	All covers on storage vessels, separators, and other controlled equipment are maintained in good condition. Closed vent systems are designed to operate with no detectable emissions. Bypass devices are equipped with a flow indicator, seal, or equivalent. Inspections verify no visible gaps, cracks, or openings. » Ref: 40 CFR 60.5411a / 60.5411b, 60.5416a / 60.5416b		

Reporting and Recordkeeping

Audit Item	Expected Finding	Status	Notes / Evidence
Annual report submission	Annual reports are submitted through EPA's Compliance and Emissions Data Reporting Interface (CEDRI) within required timeframe. OOOOa: semiannual reports. OOOOb: annual reports due within 90 days after each compliance period. Report covers all affected facilities and all applicable requirements. » Ref: 40 CFR 60.5420a(b) / 60.5420b(b)		
LDAR records completeness	Records include date, operator, instrument information, and findings for each OGI and AVO survey. Leak detection records include component identification, digital photograph, date found, date repaired, and verification method. Records are retained for the required period (at least 5 years). » Ref: 40 CFR 60.5420a(c)(7) / 60.5420b(c)(7)		
Equipment-specific records	Maintenance and compliance records are maintained for each affected source category: compressor rod packing replacement dates and hours, storage vessel emissions calculations, pneumatic controller inventories, and well completion reports. Records support compliance demonstrations. » Ref: 40 CFR 60.5420a(c) / 60.5420b(c)		
Deviation reporting	Deviations from any applicable requirement are documented and reported in the annual report. Malfunctions and corrective actions are logged. Prompt notification requirements (e.g., excess emissions during startup/shutdown/malfunction) are understood and followed. » Ref: 40 CFR 60.5420a(b)(12) / 60.5420b(b)		
Super-Emitter Response Program	Facility has procedures for receiving and responding to EPA Super-Emitter Event notifications. Investigation must be initiated within 5 calendar days of notification. Response includes review of monitoring data and investigation of potential sources. Findings are documented and reported to EPA within required timeframe. » Ref: 40 CFR 60.5371b / 60.5398b		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review