

New DAQ General Permit G70-A

Oil and Natural Gas Industry Workshop
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General Permit G70-A

For the Prevention and Control of Air Pollution
in regard to the construction, modification,
relocation, administrative update and operation
of oil and natural gas production facilities
located at the well site

G70-A Status:

- * Issued October 18, 2013
- * Available on DAQ website:
www.dep.wv.gov/daq/permitting
[General Permit Registration](#)

G70-A is located at the bottom of the page (numbered sequentially)

Changes to G70-A in response to public comments:

- * Final G70-A includes 9/23/13 amendments to NSPS, Subpart OOOO
- * Final G70-A added dehydration units to applicability
 - Includes general requirements
 - Includes 40 CFR63, Subpart HH area source requirements
- * Other changes as addressed in response to comments document

G70-A

Section Overview

- * 1.0 Emission Units
- * 2.0 General Conditions
- * 3.0 Facility-Wide Requirements

Source Specific Requirements:

- * 4.0 Units listed in GP Registration
- * 5.0 Natural Gas Well Affected Facility
- * 6.0 Storage Vessels
- * 7.0 Fuel burning units: Gas Production Units, In-line Heaters, Heater Treaters, and Reboilers

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Section Overview

- * 8.0 Pneumatic Controllers Affected Facility
- * 9.0 (*Reserved*)
- * 10.0 Natural Gas-Fired Compressor Engine (RICE)
- * 11.0 Tank Truck Loading Facility
- * 12.0 NSPS, Subpart OOOO Requirements for Storage Vessel Affected Facilities
- * 13.0 NSPS, Subpart JJJJ Requirements for RICE
- * 14.0 Control Devices not subject to NSPS, Subpart OOOO Requirements

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Section Overview

- * 15.0 NESHAP, Subpart ZZZZ Areas Source Requirements for RICE
- * 16.0 Dehydration Units
- * 17.0 NESHAP, Subpart HH Area Source Requirements for Dehydration Units with exemption from § 63.764(d)
- * 18.0 NESHAP, Subpart HH Area Source Requirements for Dehydration Units Not Located within an UA/UC
- * 19.0 NESHAP, Subpart HH Area Source Requirements for Dehydration Units Located within an UA/UC

G70-A & OOOO 9/23/13 Amendments

- * EPA reconsidered certain aspects of NSPS, Subpart OOOO that were issued 8/16/12, primarily the provisions regulating VOC emissions from storage vessels.
- * Natural Gas Wells – digital photos with the date taken and latitude & longitude as a recordkeeping alternative

G70-A & 0000 9/23/13 Amendments

* Definitions (added or revised):

- Condensate
- Flow line
- Group 1 storage vessel
- Group 2 storage vessel
- Intermediate hydrocarbon liquid
- Produced water
- Storage vessel

G70-A & 9/23/13 OOOO Amendments Storage Vessels

- * “storage vessel affected facility” (SVAF)
 - includes the 6tpy VOC emission limit
 - clarifies that a source can take into account legally & practically enforceable emission limits from state permit when determining VOC emission rate
 - clarifies that SVAF whose VOC PTE decreases to < 6tpy would remain a SVAF
 - clarifies that vapor from a storage vessel that is recovered & routed to a process is not counted in the PTE to determine affected facility status

G70-A & 9/23/13 OOOO Amendments Storage Vessels

- * SVAF applicability determination by :
 - 10/15/13 for Group 1 storage vessels
 - 4/15/14, or 30 days after startup (whichever is later) for Group 2 storage vessels
- * Group 1 SV – construction, modification, reconstruction after 8/23/11 and on/before 4/12/13
- * Group 2 SV – construction, modification, reconstruction after 4/12/13

G70-A & 9/23/13 OOOO Amendments

Storage Vessels

* Emissions Determination

- No longer different requirements if other wells are already in production
- Based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline
- The determination may take into consideration registered control devices that are designed & operated in accordance with the general permit
- Vapors recovered & routed to a process through a VRU designed & operated in accordance with the general permit are not required to be included.

G70-A & 9/23/13 OOOO Amendments

SVAF Requirements

- * For Group 1 SVAF, submit notification identifying each Group 1 SVAF, including its location, with the annual report
- * Reduce VOC emissions by 95% *:
 - by 4/15/14 or within 60 days after startup (whichever later) for Group 2 SVAF
 - by 4/15/15 for Group 1 SVAF
- * Comply with control requirements, requirements for SVAF removed from service, compliance, notification, recordkeeping, & reporting requirements

G70-A & 9/23/13 OOOO Amendments

SVAF Requirements

- * Alternative 4-tpy Uncontrolled Actual VOC Emission Rate:
 - * May comply with the uncontrolled actual VOC emission rate of less than 4 tpy instead of the 95% control requirement
 - * Prior to using alternative, demonstrate that uncontrolled actual VOC emissions have remained <4 tpy as determined monthly for 12 consecutive months
 - * After demonstration, determine the uncontrolled actual VOC emission rate each month
 - * Comply with 95% control if SVAF meets certain conditions

G70-A & 9/23/13 OOOO Amendments

SVAF - Monitoring

- * Streamlined compliance monitoring provisions for controls installed to meet the 95% VOC reduction standard
- * Include: monthly inspections of covers, closed-vent systems and control devices
- * EPA continues to evaluate the reconsideration issues for compliance monitoring provisions and intends to complete their reconsideration by the end of 2014

G70-A & 9/23/13 OOOO Amendments Storage Vessels

- * Submittal of the annual report and compliance certification – 90 days after the end of the compliance period vs. 30 days

Changes to G70-A from Response to Comments - Section 14

Control devices not subject to NSPS, Subpart OOOO:

- * Added to the scope control devices used to control VOC and HAP emissions from dehydration units & added requirements for condensers.
- * Modified the closed vent system requirements based on the 9/23/13 NSPS, Subpart OOOO amendments.

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Section 16.0

Dehydration Units:

- * Based on existing requirements
- * Throughput SNE registration limit
- * Emissions SNE registration limit
- * HAP emissions calculated per 40CFR63, Subpart HH
- * Provisions for dehy units recycling back to reboiler
- * TEG dehydration units may also be subject to Section 17.0, 18.0, or 19.0

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Section 17.0

Dehydration Units with exemption from § 63.764(d):

- * NESHAP, Subpart HH Area Source Requirements
- * DAQ has taken delegation
- * Includes exceptions for both flowrate and for benzene emissions
- * The dehydration unit is also subject to Section 16.0
- * The dehydration re-boiler is also subject to Section 7.0

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Section 18.0

18.0 – Dehydration units subject to NESHAP, Subpart HH and Not Located within an Urban Area/ Urban Cluster.

- * NESHAP, Subpart HH area source requirements limited to the titled scenario for sources that do not meet either the flowrate or benzene emission exceptions to § 63.764(d).
- * The dehydration unit is also subject to Section 16.0
- * The dehydration re-boiler is also subject to Section 7.0

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Section 19.0

19.0 - Dehydration units subject to NESHAP, Subpart HH and Located within an Urban Area/ Urban Cluster.

- * NESHAP, Subpart HH requirements for sources located in an UA plus offset/ UC boundary that do not meet either the flowrate or benzene emission exceptions to § 63.764(d).
- * The dehydration unit is also subject to Section 16.0
- * The dehydration re-boiler is also subject to Section 7.0

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Q & A:

Q1: If I want to submit an application for a G70-A permit registration, what do I need to do?

A1: After you verify that all eligibility requirements are met, complete and submit the following to DAQ:

- * General Permit Registration Application,
- * All required attachments & support documents specified in the G70-A instructions and forms document
- * Certification of Information (Signed by Responsible Official or Authorized Representative)
- * G70-A Application Fee + applicable NSPS and/or NESHAP fees
- * Publish Class I Legal Advertisement

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Q & A:

Q2: What are the fees associated with the G70-A?

A2: The G70-A registration fees are as follows:

- \$500 (Construction or Modification)
- \$300 (Class II Administrative Update)
- \$1,000 (NSPS fee for Subparts JJJJ or OOOO)
- \$2,500 (NESHAP fee for Subparts ZZZZ* or HH)

Note: only one NSPS or NESHAP fee applies

** Waived for new engines that comply by NSPS, Sub JJJJ*

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Q & A:

Q3: What is required in the public notice?

A3: Accurate, & consistent information including:

- Directions must be specific and accurate
- Longitude & Latitude coordinates must be as accurate as possible (decimal format)
- Must be consistent with what was provided to OOG
- Emissions must be consistent with emissions provided in the application (include GHG emissions)

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Q & A:

Q4: When is a G70-A permit required?

A4: A G70-A permit is required any time the permit thresholds identified in 45CSR13 will be triggered.

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Q & A:

Q5: Are there plans to update the other NG General Permits?

A5: Yes, DAQ's future plans include:

- * Updating G-35A (NG compressor stations with Glycol dehydration units) to include NSPS, Subpart OOOO language and amended MACT, Subpart HH language
- * Updating G-30D (NG compressor stations) to include NSPS, Subpart OOOO language
- * Updating G-33A (engines ≥ 25 HP and ≤ 500 HP) to include NSPS, Subpart OOOO language

Questions?

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