

New Air Quality General Permit G70-A

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DAQ General Permit G70-A

What is an Air Quality General Permit?

- * General permits under 45CSR13 authorize the construction, modification or relocation of a category of sources by the same owner or operator or involving the same or similar processes or pollutants upon the terms and conditions specified in the general permit
- * G70-A is being developed for natural gas production operations at the natural gas well site
 - Eligible SIC code: 1311 Eligible NAICS code: 211111

DAQ General Permit G70-A

Benefits of the G70-A General Permit:

- * Consistent requirements for all facilities
- * Class II General Permit
 - Registrants provide public notice when application is submitted
 - DAQ public notice is done prior to G70-A general permit being issued
- * G70-A has a 45 day time frame from the date a COMPLETE permit application is received. (*Construction permits have 90 days*)
- * Lower cost for the application

Complete, Accurate, & Consistent Information for Public Notice

- * Directions to the NG production pad must be specific and accurate
- * Longitude & Latitude coordinates must be as accurate as possible
- * Locations must be consistent with what is provided to OOG.
- * Complete, accurate, & consistent information provided in the permit application and in the public notice is very important!

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Includes Requirements for:

- * Storage Vessels
- * Gas Producing Units
- * Heater Treaters (separation)
- * In-line heaters
- * Engines (RICE)
- * Tank Truck Loading
- * Control Devices not subject to NSPS, Subpart OOOO

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Includes Requirements for (cont.):

NSPS, Subpart OOOO affected facilities:

- * Natural Gas Wells
- * Storage Vessels
- * Pneumatic Controllers

NSPS, Subpart JJJJ affected facilities:

- * NG Engines (RICE)

NESHAP, Subpart ZZZZ affected facilities:

- * NG Engines (RICE)

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Included Air Pollution Control Devices & Reduction Devices:

- * Completion combustion devices
- * Enclosed combustion devices:
 - Thermal vapor incinerators, catalytic vapor incinerators, boilers, process heaters
- * Vapor recovery devices:
 - Carbon Adsorption Systems
 - Vapor Recovery Systems
- * Flares
- * For NG engines: NSCR, SCR, Catalytic Oxidation

G70-A General Permit Registrations

G70-A Registrations will include:

- * Emission Unit descriptions and ID's
- * Emission Unit design capacities
- * Emission Unit pollution control
- * Pollution control design efficiency
- * Emission limits
- * Throughput limits
- * G70-A general permit section applicability

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State Air Pollution Regulations included:

- * 45CSR2 (Control of PM from fuel burning units)
- * 45CSR4 (Prevention & control of objectionable odor)
- * 45CSR6 (Control of PM & smoke from flares, etc.)
- * 45CSR10 (Control of SO₂ from fuel burning units)
- * 45CSR13 (Permits)
- * 45CSR16 (NSPS requirements)
- * 45CSR22 (Fee program)
- * 45CSR34 (Emission Standards for HAPs)

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Federal Air Pollution Regulations included:

- * NSPS, Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission & Distribution)
- * NSPS, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines)
- * MACT, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)

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What will NOT be included:

- * Any NG production facility that is a “major source”
 - “major source” - PTE 100 tpy of any criteria pollutant, or 10 tpy individual HAP, or 25 tpy aggregate HAPs
- * Dehydration units
- * NG processing plants
- * NG sweetening plants
- * NG compressor stations
- * NG transmission and storage facilities

DAQ Air Permits

Air Quality permits are required for the following:

- * Criteria pollutants (CO, NO_x, SO₂, PM, VOC): potential to emit (PTE) of 6 lbs/hr and 10 tpy or 144 lb/day of each individual pollutant
- * Hazardous air pollutants: PTE of 2 lb/hr or 5 tpy of HAPs on an aggregated basis
- * Toxic air pollutants: Any TAP with PTE in amount greater than shown in Table 45-13A (formaldehyde limit is 1,000 lb/yr)
- * Subject to any substantive requirement
 - Rule 6 requires a rule 13 permit for combustion devices (incinerators)

DAQ Air Permits

Potential to Emit (PTE) definition (45CSR13 §2.19):

The **maximum design capacity** of a stationary source or emissions unit to emit a pollutant under its physical and operational design. Any physical or operation limitation on the capacity of the source or emissions unit to emit a pollutant, including air pollution control equipment and restrictions....shall be treated as part of its design **if** the limitation or the effect it would have on emissions is enforceable by the Secretary and U.S. EPA **in any permit** or consent order....

DAQ Air Permits

Completion Operations:

- * Completion combustion operations ALONE typically do not trigger DAQ permitting.
- * Extended use of completion combustion devices however, may require permitting.
- * The two-day notification for completion operations is required for all NG well completion operations.

G70-A Status:

- * G70-A is in draft version and has not yet been posted for public comment.
- * G70-A will undergo public notice prior to being issued.
- * Public notice will appear in: Charleston Newspapers, Dominion Post, The Herald Dispatch, The Wheeling Intelligencer, The Journal, the State Resister and possibly more.
- * G70-A will be posted to DAQ website during public review period

<http://www.dep.wv.gov/daq/publicnoticeandcomment>

Other DAQ NG General Permits

Future Plans:

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

Questions?

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