

New Air Quality General Permit G-70A

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DAQ General Permit G-70A

Air Quality permits are required for the following:

- * Subject to any substantive requirement
 - * Rule 6 requires a rule 13 permit for a combustion device (incinerator)
- * Criteria pollutants: PTE of 6 lb/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

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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

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Why is the G-70A General Permit being developed?

- * General Permit G-70A is being developed for natural gas well affected facilities and natural gas production at the well pad

What are the benefits?

- * Streamlined process
- * Consistent requirements
- * Reduced permitting time
- * Lower cost for the application

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- * G-70A general permit language will be the same for all facilities
- * G-70A general permit registrations will be unique for each facility
- * G-70A will be a Class II General Permit
- * Class II General Permits require the registrant to publish legal advertisement with a 30-day public notice period

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Is the G-70A general permit required for NG well completion operations?

No, only the two-day notification is required. Extended use of completion combustion devices however, may require additional permitting.

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Emission sources included:

- * NG well affected facility
- * Storage vessel affected facility
- * Pneumatic controller affected facility
- * In-line heaters
- * Gas Production Unit Burners
- * Heater Treaters
- * Natural Gas fired Engines
- * Tank Truck Loading

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Air Pollution Control Devices Included:

- * 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 engines: NSCR, SCR, Catalytic Oxidation

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State Air Pollution Regulations include:

- * 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)
- * 45CSR30 (Title V) - ONLY FOR DEFERRED, NON-MAJOR SOURCES
- * 45CSR34 (Emission Standards for HAPs)

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Federal Air Pollution Regulations include:

- * 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 criteria pollutant, or 10 tpy individual HAP, or 25 tpy Total HAPs
- * Dehydration units
- * NG processing plants
- * NG sweetening plants
- * NG compressor stations
- * NG transmission and storage facilities

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Next Steps:

- * G-70A will undergo public notice prior to being issued. The public notice will appear in Charleston Newspapers, Dominion Post, The Herald Dispatch, The Wheeling Intelligencer, The Journal, the State Resister and possibly more.
- * G-70A will also be posted to DAQ website during public review period.
- * G-70A general permit, registration applications, instructions and forms will be available when issued at www.dep.wv.gov/daq/permitting

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 \geq 25HP and \leq 500 HP) to include NSPS, Subpart OOOO language

Questions?

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