



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Air Quality

# Overview of Draft Final Revisions to GP-5A and GP-5

November 30, 2017

Tom Wolf, Governor

Patrick McDonnell, Secretary

# Background

- Governor Wolf's Methane Reduction Strategy directed DEP to enhance its oversight of air emissions requirements under federal and state law from unconventional gas well sites and from the natural gas mid-stream processing and transmission sectors in order to:
  - Reduce emissions that harm human health.
  - Reduce potent greenhouse gas emissions that contribute to climate change.
  - Prevent the waste of Pennsylvania's valuable natural resources.

## Background on GPs and Exemption 38

- Unconventional natural gas well sites are currently covered by Exemption 38, which is a conditional Permit Exemption. Federal and state regulations still apply to activities exempted from the permitting process.
- GP-5A is a new general permit (GP) which will be applicable to unconventional well sites and remote pigging stations.
- GP-5 is a revision to the existing GP-5 which will be applicable to mid-stream, gas processing, and gas transmission facilities.
- Both GPs will incorporate the most current state and federal regulatory requirements for facilities constructed or modified after the effective date.

# The Permitting Process

- All air contamination sources must get approval to construct and operate unless exempted from permitting. Many exempted activities must still meet applicable state and federal regulations.
- Construction approval is obtained through the plan approval process.
- Operating approval is obtained through either a state-only operating permit process for minor sources, or through the Title V operating permit process for major sources.
- As an alternative, sources may seek authorization to use General Permits.

# General Permits

- DEP may issue GPs for sources if it is determined that the sources are capable of being regulated using standardized conditions.
- Standardization reduces the administrative review time.
- Applicants seeking authorization to use GPs must demonstrate that all the terms and conditions will be met.

## Background on Proposed GP-5 and GP-5A

- DEP published the proposed GPs on February 4, 2017.
- Over 10,500 comments were received during the public comment period that closed on June 5, 2017.
- There has been extensive input from advisory boards and committees, from industry and environmental organizations, and from the public.

# What Is DEP Doing?

- Working with its Air Quality Technical Advisory Committee (AQTAC) on the final drafts for the GP-5A, GP-5, and Exemption 38.
- Posted the draft final GPs and Exemption 38 on DEP's AQTAC website to allow communication with interested parties.
- **This is not the issuance of the general permits.** We expect to issue the final GPs and Exemption 38 in the first quarter of 2018.

# What Has DEP Changed?

- Reduced the number of pages by directly referencing federal regulations for sources that do not differ from state Best Available Technology (BAT) determinations.
- BAT determinations for certain sources were revised based on comments received.
- Removed the provisions for temporary sources from GP-5A and placed them under the revised Exemption 38.
- Clarified various terms and conditions in the proposed GPs.
- Added a transition period to manage the implementation of the GPs.

# What Has DEP Not Changed?

- Permit provisions established under state BAT determination:
  - Quarterly Leak Detection and Repair (LDAR), with an off-ramp to semi-annually for GP-5A facilities.
  - Pigging and wellbore liquids unloading operations that are not addressed under federal regulations.
  - The methane threshold for requiring control from an applicable source.
  - The 98% control efficiency for methane, VOC, and HAP destruction.

# What Will the Enhanced Permits Accomplish?

- Continue Pennsylvania's leadership in regulating air emissions from the oil and gas industry.
- Maintain provisions to find and reduce methane leaks to mitigate the impact of natural gas production, processing, and transmission on climate change.
- Implement sensible requirements to reduce emissions that impact human health and the environment.
- Create a clear, understandable, and implementable general permit for facilities in the natural gas industry.
- Reduce waste of valuable Pennsylvania resources.



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Air Quality

# **Bureau of Air Quality**

## **Dept. of Environmental Protection**

*Press Inquiries:*

**Neil Shader, 717-787-1323**

**[nshader@pa.gov](mailto:nshader@pa.gov)**

*Program Contacts:*

**Krishnan Ramamurthy, 717-787-9702**

**Naishadh Bhatt, 717-787-2856**