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DEPARTMENT OF ENVIRONMENTAL PROTECTION



Office of Waste, Air, Radiation & Remediation

BAQ-GPA/GP-5 Implementation Issues: Regional Perspectives – Operations

Bureau of Air Quality

July 22, 2015

Tom Wolf, Governor

John Quigley, Secretary

GP-5 Implementation Issues - Operations

- Initial Notifications
- Stack Testing
- Periodic Monitoring
- Reporting
- Authorizations
- Compliance with Federal Requirements
- Compliance with Storage Tank Requirements
- Housekeeping & Best Practices

Initial Notifications Submitted to DEP

- Initial commencement of construction
- Final completion of construction
- Lapses in construction >18 months
 - Notice to DEP in writing, within 5 business days following the lapse
- Intent to commence operation
 - Notice to DEP in writing, at least 5 business days prior to commencing operation
- Comply with federal notice requirements
- Notification requirements are per source

Stack Testing Requirements

- New & reconstructed engines >500 bhp
 - Testing within 180 days of initial startup or reauthorization for NO_x, CO, HCHO, NMHC/NMNEHC.
- New & reconstructed turbines >1000 bhp
 - Testing within 180 days of initial startup or reauthorization for NO_x, CO, NMNEHC, PM.

Stack Testing Requirements

- Test protocols must be submitted to the appropriate DEP Regional Office and Division of Source Testing & Monitoring at least 30 calendar days prior to commencing and emission testing program.
 - Protocol approval needed prior to testing.
- Testing notifications must submitted to the Regional Office and Div. of Source Testing at least 15 calendar days prior to testing.
- Test report to Regional Office and Div. of Source Testing no later than 60 calendar days after completion of testing
 - Report to include Primary Facility ID, Source ID(s), Permit #, purpose of testing.

Stack Testing

- Testing must be conducted according to 25 Pa. Code Chapter 139 & DEP's Source Testing Manual
 - <http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-8626>
- Comply with applicable Federal testing/retesting requirements including (NSPS Subpart JJJJ etc.).

Periodic Monitoring

- New **and existing** engines >500 bhp
- Turbines >1000 bhp
 - Periodic monitoring for NOx & CO, every 2,500 hours of operation (results for stack tests performed within 45 calendar days may be used in lieu of periodic monitoring).
- Portable analyzer testing
 - Three (3) 20-minute runs.
 - ASTM Method D6522 or equivalent, as approved by the Department.

Periodic Monitoring

- Initial protocol must be submitted to DEP's Division of Source Testing & Monitoring for approval.
 - Single approval for a protocol may be granted for subsequent period monitoring and also for similar sources.
 - One protocol may be submitted for multiple sites.
- Results must be submitted to the appropriate Regional Office within 30 days of completion.

Reporting

- Annual certification of GP-5 compliance
 - Submitted to Regional Office by March 1 for prior calendar year.
- Annual source reporting
 - Submitted to Regional Office by March 1 for prior calendar year.
 - Emissions data for all sources regulated under GP
 - CO, NO_x, PM₁₀, PM_{2.5}, SO₂, VOC, total & individual HAP, greenhouse gases (as CO₂e).

Reporting

- Malfunctions reported to DEP by telephone within 24 hours of occurrence.
 - No later than 4 p.m. of first subsequent business day in case of weekends/holidays.
 - Notify county EMA in cases of danger to public
 - Written notice to DEP within 3 days in cases of danger to public.
 - Otherwise, written notice to DEP within 5 days.
- Comply with all applicable federal reporting requirements.

GP-5 Authorizations

- A GP-5 authorization is **only** for sources originally proposed/authorized by DEP.
- Additional sources or deviations from originally authorized sources may require a new GP-5 authorization.
- Like-kind replacements are not authorized under GP-5.

GP-5 Authorizations

- A complete GP-5 Application for a re-authorization to use GP-5 must be submitted to DEP at least 30 days prior to the expiration date for the existing authorization.
- New GP-5 Application required to transfer ownership of a facility.

Compliance with Federal Requirements

- An owner or operator must comply with **all** federal requirements
 - Including (but not limited to) 40 CFR Part 60, Subparts III, JJJ, KKK, OOOO, Kb; 40 CFR Part 63, Subparts ZZZZ, HH.

Compliance with Storage Tank Conditions

- Storage tanks
 - All storage tanks containing VOC (vapor pressure >1.5 psia (10.5 kPa) are subject to 25 Pa. Code §§129.56-129.57.

Recordkeeping Requirements

- Records must be maintained on site for at least five years. The records include:
 - Maintenance as required under GP-5
 - LDAR procedures & logs
 - Hours of operation & fuel usage
 - Control device operation inspections



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Questions?



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Adam Holquist
Air Quality Engineering Specialist
Northwest Regional Office
aholquist@pa.gov
814.332.6986