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
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
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!
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
Includes Requirements for (cont.):
NSPS, Subpart OOOO affected facilities:
   * Natural Gas Wells
   * Storage Vessels
   * Pneumatic Controllers
NSPS, Subpart JJJJJ affected facilities:
   * NG Engines (RICE)
NESHAP, Subpart ZZZZZ affected facilities:
   * NG Engines (RICE)
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 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
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 SO$_2$ from fuel burning units)
- 45CSR13 (Permits)
- 45CSR16 (NSPS requirements)
- 45CSR22 (Fee program)
- 45CSR34 (Emission Standards for HAPs)
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)
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
Air Quality permits are required for the following:

- Criteria pollutants (CO, NO\textsubscript{x}, SO\textsubscript{2}, 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)
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…. 
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.
* G70-A will be posted to DAQ website during public review period

http://www.dep.wv.gov/daq/publicnoticeandcomment
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 ≥ 25HP and ≤ 500 HP) to include NSPS, Subpart OOOO language
Questions?

Laura Jennings
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Phone: 304-926-0499 ext. 1217
E-mail: Laura.M.Jennings@wv.gov