

## Oil & Gas and Air Permitting

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## History

- Regulation began in early 1970s
- Tiered approach developed over time:
  - de minimis
  - historical standard exemptions
  - permits by rule (PBR)
  - standard permits
  - case-by-case permits



## Inside Barnett Shale

- Existing sites that have never registered submit historical notification by 12/31/13
- PBR - §106.352 (a)-(k)
- Standard Permit – Air Quality Standard Permit for Oil and Gas Handling and Production Facilities
- Case by case NSR permit



## Outside Barnett Shale

- PBR - §106.352 (l)
- Standard Permit - §116.620
- Case by case NSR permit



## Statewide Rule

- Start with a blank page and write a rule that:
  - Authorizes everything at a site
  - Authorizes as many sites as possible
  - Demonstrates compliance
  - Is enforceable
  - Is simple and easy to understand
  - Is not burdensome for industry
- Currently accepting comments – 5/31/11



## Why change anything?

- New technology and science
- New EPA standards
- TCEQ continually re-evaluates general authorizations
- Demonstrate protectiveness/compliance
- 25 year old PBR
- MSS currently scheduled for 1/5/2012



## What is MSS?

- MSS emissions include air emissions resulting from the maintenance, start-up, or shutdown of equipment or facilities at a site.
- The TCEQ authorizes *planned* MSS emissions.
- MSS activities do NOT have to be scheduled for a specific date or time.



## Planned MSS Examples

- Examples of Planned MSS
  - routine maintenance
  - blowdowns
  - pipeline pigging
  - redirection of emissions to another control device
  - tank de-gassing



## MSS is not...

- Planned MSS emissions do not include unplanned MSS, upsets, or emission events.
- The TCEQ does not have the authority to authorize unplanned MSS, upsets, or emission events.



## Unplanned MSS Examples

- Unplanned MSS emissions may include emissions from events such as
  - accidental releases or
  - venting an exhaust stream to an emergency flare



## Find helpful Oil & Gas tools and links at:

Small Business and Local Government Assistance  
<http://www.tceq.texas.gov/assistance/sblga/industry/oilgas.html>

Air Standard Permit and calculations spreadsheets  
[http://www.tceq.texas.gov/permitting/air/newsources/review/chemical/oil\\_and\\_gas\\_sp.html](http://www.tceq.texas.gov/permitting/air/newsources/review/chemical/oil_and_gas_sp.html)



## Questions?



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