



# eBrief

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## **GPA review on EPA's New Source Performance Standards (O000) Rule**

GPA's Environmental Committee has played a central role in shaping the Environmental Protection Agency's (EPA) new Clean Air Act regulations affecting natural gas infrastructure. 2013 was a busy and successful year for our Environmental Committee's efforts, and there is much more to do in 2014.

In 2012, EPA issued a rule titled "Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutant Reviews: Final Rule." The rule included both New Source Performance Standards (NSPS) covering emissions of volatile organic compounds and sulfur dioxide (referred to as "Quad O"), and national emission standards for certain hazardous air pollutants (the "Oil and Gas NESHAP"). After EPA issued the rule, GPA and a number of other industry associations filed a petition with EPA requesting the agency administratively reconsider several elements of the Oil and Gas NSPS. At the same time, GPA and industry allies filed a petition for review of the rule in the Court of Appeals for the D.C. Circuit.

In January 2013, EPA granted the petitions from GPA and others to administratively reconsider key issues in the Oil and Gas NSPS. All of the parties (including EPA) then filed a joint motion with the D.C. Circuit asking the court to hold the legal challenges to the Oil and Gas NSPS in abeyance pending EPA's administrative reconsideration. The motion also asked the court to sever the litigation related to the Oil and Gas NESHAP and allow it to proceed on a separate track. The court granted the motion.

Throughout 2013, GPA's Environmental Committee was an active participant in EPA's "fast-track" rulemaking, both submitting comments on the proposed version of the rule and having several meetings with EPA officials. GPA had a number of priorities in this rulemaking, including: (1) narrowing the scope of storage vessels subject to the rule; (2) extending the compliance deadline to a date when emission control equipment would be available; and (3) making the compliance monitoring requirements less onerous.

EPA issued the "fast-track" reconsideration rule in September. The "fast-track" rule was responsive to most of GPA's major concerns. Most importantly, it extended and modified the key compliance deadline for storage vessels, thereby preventing a wave of otherwise unavoidable violations.

However, as happens too often, the revised rule also raised some new issues and left some unfinished business. For example, the revised rule: is unclear as to whether flares can be used to control emissions from regulated storage vessels; is unclear about treatment of out-of-service storage vessels relocated to other sites; and does not provide sufficient time for modified or reconstructed storage vessels to come into compliance.

Accordingly, in December, GPA and its industry allies filed petitions for administrative reconsideration of the “fast-track” rule. Also, in order to protect its rights in court, GPA and others filed petitions for review of the “fast-track” rule in the D.C. Circuit. Once again, all of the parties (including EPA) filed a joint motion with the court to hold these new petitions in abeyance until the end of the rulemaking process (GPA’s lawyers organized this joint motion). The court granted the motion on December 27.

As of February 2014, EPA has not yet acted on the petitions for administrative reconsideration of the “fast-track” rule. In addition, EPA has not yet made clear whether it believes there is sufficient unfinished business to undertake a second rulemaking on the Oil and Gas NSPS.

GPA’s Environmental Committee is prepared to participate in new rulemakings and/or litigation as needed.

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#### **GPSA membership renewal reminder**

We still have not received some companies’ membership renewal dues for 2014. As a reminder, companies that don’t renew by the end of June will be removed from the GPSA membership roster, the GPSA web site and service/supply directory, and from Section 26 of the GPSA Engineering Data Book. Once a company declines membership, the \$100 initiation fee will once again be required to re-join the association.

Renew memberships by credit card online: <https://gpsa.gpaglobal.org/register/gpsamembership/>

For questions about your company’s membership or payment status, contact [Piper Penny](#), (918) 493-3872.

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#### **GPSA Directors Ballot due**

On Feb. 14, the 2013 GPSA Directors Ballot was electronically distributed to GPSA member companies. All GPSA Official Representatives should complete their ballots and submit via the link provided; the electronic process requires just a few minutes of your time to complete the ballot. The ballot closing date is March 14; ballots received after that date will not be counted. Please take a moment to participate in this important association activity and help select GPSA’s 2014-2015 leadership.

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#### **GPA 2014 Nominating Committee**

The 2014 GPA Nominating Committee will soon be appointed by GPA Chairman Joel Moxley, Crestwood Midstream Partners. As specified in the GPA bylaws, the Nominating Committee is made up of five Official Representatives of GPA member companies. Its duties are to 1) nominate individuals to serve as chairman, chairman-elect and GPA’s three vice chairmen, and 2) select the companies that will be nominated to serve on the board of directors. Each of these nominations will be up for approval at the annual meeting of the membership on April 15 in Dallas. Questions regarding this process should be directed to GPA staff.

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#### **EPA relinquishes greenhouse gas permitting authority**

The U.S. Environmental Protection Agency (EPA) has relinquished authority over greenhouse gas (GHG) permitting to the Texas Commission on Environmental Quality (TCEQ). Throughout the 2013 Texas legislative session, GPA lobbyist Kelly McBeth worked closely with legislative leaders, TCEQ, and other industry associations in support of legislation to allow TCEQ to issue GHG permits. GPA Past President Mike Heim, Targa Resources, visited the Texas Capitol and provided testimony at the House and Senate Energy Committees explaining how the EPA delays in issuing permits had negatively affected companies doing business within Texas.

Following months of negotiations, EPA administrator in Dallas, Ron Curry, signed the papers delegating authority over the program to TCEQ.

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#### **GPA Stain Tube Standards out for ballot**

GPA Standards 2188 and 2194 have been sent to Technical Section B and the Technical Committee for ballot. This is an opportunity for members of both committees to review the revised standards and provide comments and/or approve the revisions. To have an effective process, it is important that the members of these committees send in their votes by the deadline that is noted on the ballot.

Ballot due March 4: ***GPA Standard 2194 – Tentative Low Pressure Field Method for Determining Ethyl Mercaptan Odorant in LP Gas Using Length of Stain Tubes***

Ballot due March 7: ***GPA Standard 2188 – Determination of Ethyl Mercaptan in LP Gas Using a Length of Stain Tubes***

For questions about these standards or the balloting process, contact Debbie Beaver, GPA director of technical services: [dbeaver@GPAglobal.org](mailto:dbeaver@GPAglobal.org) or (918) 493-3872.

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## 2014 GPA Convention updates

**April 13 – 16 – Dallas, Texas**  
*Mobilizing Midstream: A Global Connection*

### Registration

With less than 8 weeks to go, more than 1,500 midstream professionals have registered for the 2014 GPA Convention. Interested in seeing who's registered? Our registration list is updated every Friday; view the list here: [www.GPAconvention.org/2014-attendees](http://www.GPAconvention.org/2014-attendees).

For those who are still considering whether to join us, please keep in mind that advanced registration fees will close on Friday, March 14. Anyone wishing to attend after this date will pay on-site fees.

For those who have already registered, please keep an eye on your inbox for important GPA Convention e-mails, which we'll be sending in March.

For all GPA Convention information, visit [www.GPAconvention.org](http://www.GPAconvention.org).

### Hotel information

Our host hotel, the Omni Dallas, as well as our two overflow hotels, have sold out of rooms. We are working to secure additional rooms at nearby hotels. We have also secured a shuttle that will run between the overflow hotels and the Omni during conference hours for convenience. More information about the shuttle service will be communicated as we get closer to the event dates. For the most current information about convention hotel rooms, visit [www.GPAconvention.org/2014-hotel](http://www.GPAconvention.org/2014-hotel).

### GPA Convention Show Daily ads

If you can't make it this year, you can still interact with midstream professionals by advertising in the GPA Show Daily, which will be distributed each day of the convention to attendees and also electronically to GPA's entire midstream database of more than 10,000 e-mail addresses. Advertising is limited among the 12 pages in each issue and the deadline to commit is March 1. Availability:

#### Jr. Half Page Ad

4.75" x 7.5"

Monday, Tuesday and Wednesday Issues - \$4,500

#### Jr. Full Page Ad

7" x 10"

Tuesday and Wednesday issues - \$5,000

Learn more: <https://gpaconvention.org/assets/convention/pdf/GPA-2014-Show-Daily-Rate-Card.pdf>

### New! The GPA App for convention attendees

The new GPA app has already become an invaluable resource offered exclusively to GPA convention attendees to help you make the most of your convention experience.

### What can the app do for you?

- It provides access to the most recent schedule information, allowing you to bookmark activities of interest and view activities by day or by speaker. Each scheduled item will also allow you to click on the location and view an interactive hotel map, leading you right to the desired activity
- Committee meeting agendas and rosters will be available under their respective listings within the schedule
- Pre-prints of papers and/or presentations (if provided to GPA by the deadline) will be available and linked to the appropriate sessions/forums
- It also provides an attendee list by last name that includes attendee name, company name and title. We'll also provide a PDF list of registrants sorted by company name in early April
- The Maps icon will give you a list of different hotel floors and activities scheduled for each room that you always have access to from your device
- The Exhibitors icon includes information about our GPA Convention Friends and Vendor Night exhibitors, plus a complete list of Hospitalities scheduled during the convention (hospitality information will in the app by March 14)
- Looking for a specific meeting, or topic, quickly? You can use the Search icon to find it.

The app is available for download now, and those who have registered for the convention will receive instructions on how to access the app (for iPhones, iPads and Androids) or the web-based version (for all other devices).

If you have registered but haven't yet received download instructions, contact Crystal Myers for the information: [cmyers@GPAglobal.org](mailto:cmyers@GPAglobal.org).

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## **GPA/GPSA Calendar**

### **March**

**5** – North Texas GPA Lunch and Learn

**19** – Houston GPA Luncheon

### **April**

**13 – 16** – 2014 GPA Convention

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### **Gas Processors Association**

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