

December 6, 2011

Re: Initial Notification Concerning Source Reports and Annual Air Emissions Inventories

Dear Sir/Madam:

Your company has been identified as an owner or operator of one or more facilities that may be engaged in natural gas development activities in the Commonwealth of Pennsylvania. In accordance with Section 4(3) of the Pennsylvania Air Pollution Control Act (35 P.S. Section 4004(3)) and 25 *Pa. Code* Chapter 135, Section 135.3 (relating to reporting sources), the Pennsylvania Department of Environmental Protection (DEP or Department) is authorized to collect air quality emissions inventories from owners and operators of facilities engaged in natural gas development, production, transmission, processing and related activities.

Complete source reports including emissions data should be submitted to DEP by March 1, 2012, for operations during the 2011 calendar year. Subsequently, the reports and annual emissions inventories under Section 135.3 will be due to DEP by March 1 each year for operations during the preceding calendar year. Emission statements required for stationary sources emitting 50 and 100 tons per year of volatile organic compounds and oxides of nitrogen, respectively, should have already been submitted to the Department as required under 25 *Pa. Code* Section 135.21 (relating to emission statements).

DEP is requesting detailed equipment information along with location and production information in order to include an emission inventory for the natural gas sector in the statewide emissions inventory that will be submitted to the U.S. Environmental Protection Agency (EPA) by December 31, 2012, as required under 40 CFR Part 51, Subpart A (relating to air emissions reporting requirements). The types of information requested include the following:

- Company contact information
- Lease/facility location information
- Equipment and production information
- Air emission data for sources associated with natural gas development, production, transmission, processing and related activities. An emission inventory reporting spreadsheet will be available for the reporting of emissions from sources including: compressor stations, stationary engines, heaters, tanks/impoundments, dehydration units, pneumatic pumps, fugitives, line and well venting and blowdowns, drill rigs and well completions.
- Emissions data is being requested for air contaminants including, but not limited to the following: carbon monoxide, oxides of nitrogen (NO_x), particulate matter less than 10 micrometers in

diameter (PM10), particulate matter less than 2.5 micrometers in diameter (PM2.5), sulfur dioxide, volatile organic compounds, total hazardous air pollutants (HAP) and speciated individual HAP emissions.

As previously mentioned, the requested reports and emission inventories for operations during the 2011 calendar year should be submitted electronically to DEP by March 1, 2012. The owners/operators of facilities engaged in natural gas development, production, transmission, processing and related activities should log on to the DEP Oil and Gas-Electronic (OGRE) system on DEP's website. An option will be available on OGRE for air quality emissions. Selecting that option will provide a listing of all sites associated with the owner/operator and the ability to download a spreadsheet preloaded with certain information. This website and reporting system will be available for use in February 2012. The owners/operators should submit the completed spreadsheets using the OGRE system. DEP will notify the owners/operators when the system is available for access.

Below are links to resources that may be helpful in completing the requested emissions inventories. Other resources and quantification methodologies may also be used, as appropriate:

- United States Environmental Protection Agency (EPA) Technology Transfer Network Clearinghouse for Inventories & Emissions Factors
<http://www.epa.gov/ttn/chief/eiinformation.html>
- Emission Factors & AP 42, Compilation of Air Pollutant Emission Factors
<http://www.epa.gov/ttn/chief/ap42>
- The Factor Information Retrieval (FIRE) Data System - A database management system containing the EPA's recommended emission estimation factors for criteria and hazardous air pollutants. <http://cfpub.epa.gov/webfire/#fire>
- TANKS - A Windows-based computer software program that estimates volatile organic compound and hazardous air pollutant emissions from fixed- and floating-roof storage tanks.
<http://www.epa.gov/ttn/chief/software/tanks/index.html>
- WATER9 - A Windows-based computer program that consists of analytical expressions for estimating air emissions of individual waste constituents in wastewater collection, storage, treatment, and disposal facilities; a database listing many of the organic compounds; and procedures for obtaining reports of constituent fates, including air emissions and treatment effectiveness. <http://www.epa.gov/ttn/chief/software/water/index.html>

Please contact Michael Rudawski at 717.783.9241 or by e-mail at mrudawski@pa.gov should you have any questions or need additional information.

Sincerely,



Dean E. Van Orden
Assistant Director
Bureau of Air Quality