

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
GP-5, GP-5A Malfunction Reporting Instructions

- 1. Malfunction reporting to the PA Department of Environmental Protection (DEP or Department) under GP-5 or GP-5A must be conducted as follows:**
 - a. The owner/operator authorized to use GP-5 or GP-5A shall report to the DEP each malfunction that results in a potential exceedance of the GP-5 or GP-5A emissions limits. For GP-5 or GP-5A purposes, the term malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control or process equipment, or, operating in a non-permitted manner, which results in, or may possibly be resulting in, the emission of air contaminants in excess of any applicable limitations specified in GP-5 or GP-5A.
 - b. The notification, recordkeeping and reporting requirements relating to performance testing, work practice and monitoring standards, equipment leaks or fugitive emissions noted in GP-5 or GP-5A are not subject to the malfunction reporting requirements.
 - c. When the malfunction or incident poses an imminent and substantial danger to the public health and safety, and/or potential harm to the environment, the owner/operator shall report the incident to the Department and the County Emergency Management Agency immediately after the discovery of an incident. The owner/ operator shall submit a written report of instances of such malfunctions or incidents to the Department within three (3) business days of the telephone report.
 - i. The Report shall describe include the following:
 - (A) name and location of the facility;
 - (B) nature and cause of the malfunction or incident;
 - (C) time when the malfunction, incident or breakdown was first observed;
 - (B) expected duration of increased emissions; and
 - (E) estimated rate of emissions
 - ii. The Owner/Operator shall notify the Department immediately when corrective measures have been accomplished.
 - d. Incidents covered by the notification, recordkeeping and reporting requirements relating to performance testing, work practice and monitoring standards, equipment leaks or fugitive emissions noted in this general permit are not subject to the reporting requirements of this section.
 - e. Any malfunction or incident that is not subject to the notice requirements of paragraph (c) of this document shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or e-mail within five days of discovery of the incident. The report shall contain the same information required by paragraph c. i. above.

- f. The Department may require, when a malfunction or other incident results in citizen complaints, the Owner/Operator to report the incident immediately to the Department. The Department will review the incident and determine if a written follow up report including corrective action is needed.
- g. Malfunctions shall be reported to the appropriate DEP Regional Office Air Program Manager.

2. Examples of Malfunctions or Incidents are provided below.

a. Malfunctions or incidents posing an imminent and substantial danger to the public health and safety

- **Reportable**
 - o Fire
 - o Explosion or,
 - o Explosive or other condition that may impact outside of the fence-line or require evacuations

b. Malfunctions or incidents that do not pose an imminent and substantial danger to public health and safety but may result in an exceedance of GP-5 or GP-5A emissions limits.

- **Reportable Malfunctions or Incidents**
 - o Process equipment incidents, or air pollution control equipment shutdown or reduction in control which results in VOC, NOX, CO, HAP, or Formaldehyde emissions in excess of the GP-5 or GP-5A emissions limits or permit requirements.
 - o Equipment or operation failure, or malfunctions in process or pollution control equipment that result in fugitive particulate emission or odor beyond the facility boundary.
- **Non-reportable Malfunctions or Incidents**
 - o Air Pollution Control equipment shutdowns that are rectified by automatic restarts, other adjustments of the operation as per the manufacturer.
 - o Air Pollution Control equipment shutdowns which are manually restarted within one hour of the malfunction and do not result in emissions in excess of GP-5 or GP-5A limitations.
 - o Malfunctions in process or pollution control equipment which result in odor or fugitive dust emissions which are contained within the facility's fence-line.
 - o Building fire eyes or gas detector trips that pose no harm to the public.
 - o False fire eyes or other safety device trips which do not pose harm to the public.
 - o Upset conditions within the site boundaries which do not pose a threat to the public provided that they do not result in a potential exceedance of the GP-5 or GP-5A emissions limits.

c. Emergency Releases

- **Reportable Releases**

- o Unplanned Emergency Shut-down events that result in a potential exceedance of permit emission limits or create an offsite risk.
- o Relief valves that stay open, or frequently relieve and may result in a potential exceedance of permit limits.

- **Non- Reportable Releases**

- o Vents from pressure safety relief valves (PSVs) that do not result in a potential exceedance of permit limits or create an offsite risk. However, DEP should be notified by telephone if there is noise from the release that results in community complaints to the facility owner/operator, or there are multiple PSV incidents.

d. Planned Compressor Vents, Engine Starters and Other Emissions Included in the Application

- **Non-Reportable Releases**

- o Venting from compressors as described in the GP-5 or GP-5A Application that do not result in an exceedance of emission limits.
- o Gas from engine starters as described in the application that do not result in an exceedance of emission limits. Planned or required ESDs included in the application that do not result in an exceedance of emission limits.
- o Rod packing or crankcase vent emissions – source of minor significance normally detailed in the permit application.

e. Malfunctions or Other Incidents That Result in Citizen Complaints – Courtesy Reporting

- **Incident Reporting**

- o Noise from pressure relief valves or other safety devices that result in community complaints to the facility owner/operator.
- o Odors from an off-site source when detected in the area
- o Issues that have received prior community complaints
- o Emergency Response Drills held at the facility where a number of emergency vehicles may be present.

f. Dehydrators

- **Reportable Incidents**

- o Still vent bypass or flash tank venting from freezing or process malfunction that has the potential to exceed permit emission limitations.
- o Malfunctions of process controls that may or may not result in exceedances of permit limits.