



June 2015 eBrief Print Version

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Deadline approaching: GPA School of Gas Chromatography registration

July 11 is the deadline to save \$100 on registration for the GPA School of Gas Chromatography, scheduled Aug. 3 - 7 at the University of Tulsa (Oklahoma). In its 42nd year, this intensive one-week school has proven to be one of the best available worldwide. GPA will take up to 100 students this year, and GPA's Analysis and Test Methods Section (Technical Section B) will manage, direct and conduct the school as in past years.

Registration is available on a first-come, first-served basis, so we encourage you to register early not only to guarantee a spot but also to save on registration fees.

Early Bird Registration (by July 11)

\$675 - GPA / GPSA Members

\$975 - Non-Members

Standard Registration (after July 11)

\$775 - GPA / GPSA Members

\$1,075 - Non-Members

For more information, visit <https://www.GPAGlobal.org/education/gas-chromatography-school>.

GPA opens Washington, D.C. office

We are pleased to report that GPA has signed a lease, furnished and set up the GPA Office of Federal Affairs in Washington, D.C. The office places GPA directly behind the U.S. Capitol and the Library of Congress and is one block from the U.S. House of Representatives and two blocks from the U.S. Senate. This will serve as the primary office for GPA Vice President of Government Affairs Matthew Hite. Please stop by next time you are in Washington, D.C.

GPA Office of Federal Affairs
229 1/2 Pennsylvania Avenue, SE
Washington, DC 20003
Office: (202) 560 -5404

New OSHA interpretation to impact GPA/GPSA members

OSHA recently issued new guidance to their inspectors when evaluating Recognized and Generally Accepted Good Engineering Practices (RAGAGEP) at process safety management (PSM) sites. The guidance includes new interpretations on how a facility should apply RAGAGEP and, most importantly, defines how facilities apply "should" and "shall" terms found in industry standards. This is a significant shift in how industry standards will be used and implemented. View policy guidance text here:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=29414

The memorandum, which was issued by Director of Enforcement Programs Thomas Galassi to regional administrators and state plan designees, begins by admitting that the term RAGAGEP is not defined. It then proceeds to "interpret" RAGAGEP by applying a definition found in the Center for Chemical Process Safety's Guidelines for Mechanical Integrity Systems. Significantly, while OSHA acknowledges that RAGAGEP appears in only limited instances in the

text of the PSM standard, the memorandum suggests that inspectors should consider the concept more broadly, applying it to “process equipment design, installation, operation, and maintenance; inspection and test practices; and inspection and test frequencies.” According to the memorandum, “RAGAGEP can also provide useful background and context, and can help CSHOs identify and document hazards and feasible means of abatement when reviewing other aspects of the employer’s PSM program and covered equipment.” These interpretations appear to be extra-contextual and not necessarily arising from the PSM standard.

In addition, the memorandum touches on several of the controversies associated with RAGAGEP enforcement, including the use of employer internal documents as RAGAGEP. According to OSHA, the primary sources of RAGAGEP are published and widely adopted codes, published consensus documents, and, when appropriate, published non-consensus documents. OSHA explains that an employer’s internal standards can also serve as RAGAGEP, but only so long as the internal standards “either meet or exceed the protective requirements of published RAGAGEP where such RAGAGEP exist.” Again, this burden on employers does not appear in the text of the PSM standard.

OSHA also describes its interpretation of “shall” and “should” language in RAGAGEP. Unsurprisingly, OSHA makes clear that use of “shall” in a published RAGAGEP is viewed as a mandatory minimum requirement, and a deviation from “shall” requirements will constitute a violation. With regard to “should” statements, OSHA explains that these are “an acceptable and preferred approach ... to controlling a recognized hazard,” and, if the statement is applicable, OSHA presumes that where employers deviate from it, a violation has occurred. OSHA instructs inspectors to evaluate whether the “should” provision is not applicable or “whether the employer has determined and documented that the alternate approach is at least as protective.” If this documentation is not available, the inspector should examine available documentation “to determine if the employer’s approach is as protective as the published RAGAGEP and is a good engineering practice.” OSHA relies on its inspectors to evaluate highly complex company engineering guidelines.

The memorandum represents a significant expansion in OSHA’s interpretation of RAGAGEP, and GPA/GPSA member companies will be impacted by this significant shift. This issue is being addressed by the GPA Safety Committee and impacts technical and operational activities as well.

GPA applies to serve on Pipeline Infrastructure Task Force

Pennsylvania’s new Democrat Governor Tom Wolf has announced the formation of the Pipeline Infrastructure Task Force (PITF), intending to help Commonwealth agencies, the natural gas industry and communities across Pennsylvania work together as thousands of miles of pipelines are being proposed to transport natural gas and related products throughout the state.

The task force is supposed to include representatives from state agencies, the legislature, federal and local governments, the pipeline and natural gas industries and environmental groups. The goal of the PITF is to recommend a series of best practices for: planning, siting and routing pipelines to avoid/reduce environmental and community impacts; engaging in meaningful public participation; efficient permitting process; employing construction methods that reduce environmental impact; and developing long-term operations and maintenance plans to ensure pipeline safety and integrity. A final report of the findings will be submitted to the governor in February 2016.

GPA Director of State Government Affairs Debbie Beaver has applied for a seat on the panel to represent the midstream industry and should find out in the coming weeks whether GPA has been selected to serve on the task force.

“GPA members could be significantly impacted from this task force’s recommendations, and it’s important that we have a seat at the table and are part of the conversation in Pennsylvania,” Beaver said.

GPA files comments on EPA’s proposed rule on Electronic Reporting and Recordkeeping Requirements for New Source Performance Standards

On June 18, GPA filed comments on the proposed rule that would require the owner/operator responsible official to electronically submit specified reports required under 40 CFR part 60 to the EPA’s Central Data Exchange rather than submitting them in paper format. GPA member companies subject to New Source Performance Standards (NSPS) pertaining to the natural gas industry include subparts A, Ka, Kb, GG, LLL, IIII, JJJJ, KKKK and OOOO. None of the reports required under subpart KKK contain air emissions data that the EPA is requesting be submitted under this proposal. EPA, however, may require electronic submittal of these reports at a later time.

GPA supports using electronic test data in pursuing emissions factor development improvements. GPA is also in agreement that test data reported electronically would greatly aid in the development of emission factors of higher quality and representative of the whole industry sector. However, GPA has a number of concerns regarding the EPA’s proposed Electronic Reporting and Recordkeeping Requirements for New Source Performance Standards. Specifically:

- The proposed rule does not give any exception to submitting the required reports via the electronic reporting system
- EPA needs to clarify when electronic reports are required, EPA should allow companies more time to prepare for compliance

- Additional flexibility is needed for the user roles within the Compliance and Emissions Data Reporting Interface
- EPA should not eliminate the exemption in air agency delegation agreements allowing sources to refrain from submitting reports to EPA
- EPA cannot require data elements not required to be reported under a subpart
- The costs associated with the rule compliance are erroneous

View the GPA comments: <https://gpaglobal.org/assets/gpa/pdf/comments/2015/GPA-EPA-Comments-06-18-15.pdf>

GPA/GPSA Calendar

July

- 9 – 10 Chapter Leadership Meeting
- 17 Rocky Mountain GPA Scholarship Golf Tournament

August

- 3 – 7 GPA School of Gas Chromatography
 - 18 Appalachian Basin GPA Luncheon
 - 18 – 19 GPA/GPSA Summer Board Meetings
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Gas Processors Association

Sixty Sixty American Plaza, Suite 700
Tulsa, Oklahoma 74135
(918) 493-3872
www.GPAglobal.org
GPA@GPAglobal.org
