

PPC Plans: Top Ten Points to Remember

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What is a PPC Plan?

- Preparedness, Prevention and Contingency (PPC) Plan
- Road map to:
 - Minimize likelihood of release of polluting substance; and
 - React to releases if they happen



10. Know Why Plans are Important

- Prevent Environmental Harm
 - Stewardship
 - Good Public Relations
- Permit Requirement
- Enforcement / Permit Freeze

10. Know Why Plans are Important



9. Know Whether You Need a Plan

- Generally – Facilities with potential to cause accidental pollution of air, land or water or endangerment of health and safety
- Oil & Gas Operators
 - Drilling and Operating Oil and Gas Wells
 - Brine Disposal Wells
 - Residual Waste Processing/Transfer Facilities
 - NPDES and Part II Water Quality Permits

8. Know When to Implement the Plan

- Prepare and implement Plan:
 - Before permitted activity begins
 - Before applying for drilling permit
 - Before generating waste
 - Before operating a residual waste processing/transfer facility

7. Know Who Should Have the Plan

- On-site
- Emergency Coordinators
- PADEP (as required)
- Local Emergency Response Personnel (as necessary)

6. Know What a Plan Must Include

- Identify:
 - **Pollution-causing substances**
 - **Methods to control/dispose of these substances**
 - **Immediate actions necessary to prevent release of polluting substances**
- Keep Plan simple and readable
- Can develop generic plan and include site-specific information

6. Know What a Plan Must Include

(cont.)

- A. Description of Operations
- B. Pollution Prevention Measures
- C. Waste Disposal Methods
- D. Pollution Incident Response
- E. Narrative Section
- F. PPC Plan Schedule

5. Know Who Must Draft Plan

- Someone familiar with day-to-day operations
- Can use consultant, but must give sufficient access/information
- PE certification not required

4. Know When to Update Plan

- Revision of applicable regulations
- Change in:
 - Operation, design, maintenance, etc.
 - Emergency Coordinator/Team
 - Emergency equipment
 - Number/type of storage tanks
- Failure of Plan in an emergency
- At request of PADEP

3. Know Other Plans May Be Required

- Spill Prevention, Control, & Countermeasure (SPCC) Plan
- Federal Requirement
- Depends on quantity of oil
 - Aboveground storage > 1,320 gallons
 - Underground storage > 42,000 gallons

Applicability of SPCC Plans

- “Oil” = Condensate/drip gas
- “Oil” \neq Natural gas or liquid natural gas

SPCC Deadlines

**Existing facilities as of
8/16/02**

Comply with existing SPCC
Rules now and 2002
Amendments by 7/1/09

**Facilities beginning
operation between 8/16/02
and 7/1/09**

No SPCC plan required until
7/1/09; then comply with 2002
Amendments

**Facilities beginning
operation after 7/1/09**

Comply with 2002 Amendments
before starting operations

**Facilities qualifying for
12/5/08 Amendments**

Effective 1/14/10

December 5, 2008 Amendment

- Goals – Streamline and clarify
- Several provisions tailored to:
 - Oil production facilities
 - Produced water containers

Oil Production Facilities

- Wells, storage facilities, gathering lines and equipment
- Used to produce, extract, recover, separate or treat oil (and condensate); and
- Located in oil or gas field

Oil Production Facilities (cont.)

- Self-certification option if “qualified facility” based on:
 - Spill history
 - Number of wells/tank batteries
 - Oil production per well per day
 - Whether an injection well
 - Aggregate aboveground oil storage capacity

Produced Water Containers

- Container at oil production facility used to store produced water before reinjection, discharge, or transfer
 - Oil and water mixture resulting from separation of marketable crude oil from extracted fluid
- Possible Plan exemption for container and downstream piping and appurtenances if:
 - PE certifies complete loss would not cause harm
- Sized secondary containment exemption also available

2. Know Where to Go for Guidance

- “Guidelines for the Development and Implementation of Environmental Emergency Response Plans,” DEP Doc. No. 400-2200-001, April 2001
- Oil & Gas Operators Manual
- IOGA Safety Committee

1. Know About Consequences

- **More than 100 PPC-related O&G violations cited in 2008**
- **Penalties assessed per day**
- **Other enforcement**
- **Permit freeze**





QUESTIONS ???

