

Oil and Gas Site Planned Maintenance, Startup, and Shutdown (MSS)

MSS emissions include air emissions resulting from the maintenance, startup, or shutdown of equipment or facilities at a site.

The TCEQ authorizes planned MSS emissions. The oil and gas industry will lose its affirmative defense under 30 TAC §101 as of January 5, 2014 unless an authorization request is pending review with the TCEQ.

Planned MSS emissions include emissions that are part of normal or routine facility operations; are predictable to timing; and involve the type of emissions normally authorized by a permit.

This does not mean that MSS activities have to be scheduled for a specific date or time.

Examples of planned MSS emissions may include scheduled activities such as routine maintenance and unscheduled activities such as equipment blowdowns, pipeline pigging, or tank de-gassing.

Planned MSS emissions do not include unplanned MSS, upsets, or emission events. The TCEQ does not have the authority to authorize unplanned MSS, upsets, or emission events. MSS emissions may include emissions from events such as accidental releases or venting an exhaust stream to an emergency flare.

Any alternate operating scenarios need to obtain authorization prior to start of construction or operation. Alternate operating scenarios are not considered planned MSS. These situations include when facilities continue to operate even when primary control systems are down. This type of emission is not considered planned MSS because the TCEQ assumes that when devices, controls, or facilities are undergoing planned MSS, all associated facilities will not continue to operate/produce.