



August 24, 2018

**Via Regulations.gov**

U.S. Environmental Protection Agency  
Mail Code: 5104A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re: Comments in Response to Clean Water Act Hazardous Substances Spill Prevention, Docket EPA-HQ-OLEM-2018-0024**

Dear Sir or Madam,

The GPA Midstream Association (“GPA Midstream”) appreciates the opportunity to provide comments in response to the U.S. Environmental Protection Agency (“EPA”) proposed action for Clean Water Act Hazardous Substances Spill Prevention, 83 Fed. Reg. 29,499 (June 25, 2018).

GPA Midstream has served the U.S. energy industry since 1921. GPA Midstream is composed of nearly 100 corporate members of all sizes that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as “midstream activities.” Such processing includes the removal of impurities from the raw gas stream produced at the wellhead, as well as the extraction for sale of natural gas liquid products (“NGLs”) such as ethane, propane, butane, and natural gasoline. GPA Midstream members account for more than 90 percent of the NGLs produced in the United States from natural gas processing. Our members also operate hundreds of thousands of miles of domestic gas gathering lines and are involved with storing, transporting, and marketing natural gas and NGLs. GPA Midstream is the primary advocate for a sustainable midstream industry focused on enhancing the viability of natural gas, natural gas liquids and crude oil.

GPA Midstream supports EPA’s June 25, 2018 proposal to issue no new regulations under Clean Water Act (CWA) Section 311. While GPA Midstream member companies do not store or utilize a majority of the 13 most frequently discharged CWA hazardous substances (CWA HS) substances identified by EPA, we applaud the analysis utilized by EPA to determine if additional regulations were indeed warranted in this case. Too often, additional layers of unnecessary regulation are added by agencies without a thorough evaluation to determine if, and to what degree, those additional regulations are warranted and the benefits that would occur. EPA’s proposal is also in concert with the Trump Administration’s goals of streamlining regulatory review and eliminating unnecessary regulations.

GPA Midstream concurs with EPA’s analysis of the current framework for regulatory programs implemented by EPA and other federal agencies. EPA has clearly shown in Tables 4 through 6 that the 13 most frequently discharged CWA HS are adequately covered by existing

federal regulatory programs. Furthermore, EPA has also clearly demonstrated that with only 117 reported CWA HS releases with environmental impacts in the last decade that the existing regulatory framework is sufficient and new regulations are not justified.

GPA Midstream applauds the thorough effort undertaken by EPA to seek public and stakeholder input, analyze the need for additional regulations based upon historical releases, and analyze the existing federal and state regulatory framework for gaps that should be addressed. GPA Midstream believes EPA has clearly demonstrated that new hazardous substance spill prevention regulations are not necessary at this time and we are supportive of that proposal.

Respectfully submitted,

Matthew Hite  
Vice President of Government Affairs  
GPA Midstream Association