



VIA ELECTRONIC FILING

May 29, 2016

EPA Headquarters
Office of Water, Office of Wastewater Management
Docket ID No. EPA-HQ-OW-2015-0828
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Re: Docket No. EPA-HQ-OW-2015-0828; FRL 9944-76-OW; Draft National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Construction Activities; Federal Register Vol. 81, No. 69 (Monday, April 11, 2016);

Dear Sir/Madam,

The GPA Midstream Association appreciates the opportunity to provide comments to the United States Environmental Protection Agency (US EPA) for the proposed revisions to the National Pollutant Discharge Elimination System General Construction Permit (NPDES GCP).

GPA Midstream has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA Midstream is composed of close to 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.

While many facilities and projects constructed by GPA Midstream members fall under the NPDES oil and gas exemption, some projects undertaken by members do fall within the types of projects and activities included on US EPA’s non-exempt list. Therefore, the proposed NPDES GCP revisions would have a direct impact on GPA Midstream member companies.

GPA Midstream generally agrees with comments submitted under this same docket number by the American Gas Association (AGA), and thus incorporates AGA's comments by reference. While GPA Midstream is incorporating AGA's comments in their entirety, we would like to specifically highlight our opposition to the following US EPA suggestions:

- Item 1 – Requiring group Stormwater Pollution Prevention Plans (SWPPPs)
- Item 3 – Shortening the timeframe to complete stabilization from 14 to 7 days
- Item 5 – Changing the inspection frequency
- Item 7 – Posting SWPPPs online

GPA Midstream's rationale for opposing these issues directly aligns with AGA's rationale as described in their comment letter.

GPA Midstream appreciates your consideration of our comments on the NPDES GCP revisions. We offer our continued assistance as the US EPA considers the comments received and prepares the final revised NPDES GCP and related documents. As the process moves forward, please contact me at (202)279-1664 or mhite@gpaglobal.org if GPA Midstream can be of assistance.

Sincerely,

Matthew Hite
Vice President of Government Affairs
GPA Midstream Association