



September 27, 2010

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mailcode 6102T

Attention: Docket ID No. EPA-HQ-OAR-2008-0508

1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Comments Regarding Proposed Revisions to the Mandatory Reporting of Greenhouse Gases Rule (Proposed Rule) dated August 11, 2010 (75 FR 48744)

Dear Docket Clerk:

The Interstate Natural Gas Association of America (INGAA), a trade association of the interstate natural gas pipeline industry, respectfully submits these comments regarding the Proposed Rule, Mandatory Reporting of Greenhouse Gases (Proposed Rule) dated August 11, 2010 (75 FR 48744). The Proposed Rule addresses technical corrections and revisions to the greenhouse gas (GHG) reporting rule in Title 40, Part 98 of the Code of Federal Regulations (40 CFR 98), and INGAA is interested in proposed revisions to Subpart A (General Provisions) and Subpart C (General Stationary Fuel Combustion Sources).

INGAA member companies transport more than 85 percent of the nation's natural gas, through over 200,000 miles of interstate natural gas pipelines. INGAA member companies operate over 6,000 stationary natural gas-fired spark ignition IC engines and 1,000 stationary natural gas-fired combustion turbines, which are installed at compressor stations along the pipelines to transport natural gas to residential, commercial, industrial and electric utility customers. Many of the compressor stations are affected by the Proposed Rule, including requirements in 40 CFR 98, Subpart A and Subpart C. INGAA member companies have taken a proactive role on GHG emissions, including supporting the development of the INGAA document, *Greenhouse Gas Emission Estimation Guidelines for Natural Gas Transmission and Storage*. The INGAA GHG Guidelines present emission estimation approaches for natural gas transmission and storage systems. In cooperation with other natural gas trade associations, INGAA reviewed currently available GHG emission factors, and INGAA continues to pursue projects to improve GHG emission factors and estimation methods for natural gas systems.

In implementing the rule, INGAA members identified several concerns that are addressed in the Proposed Rule, such as deleting the reference to "pipeline" natural gas, rectifying errors in

combustion calculation parameter definitions, broadly accepting methods from consensus bodies (rather than specifying the list of methods from consensus bodies), and expanding the use of industry standard practices. Thus, INGAA generally supports the proposed revisions. However, there are several additional items in Subparts A and C that should be addressed, including:

- Revising the Subpart A definition of “maximum rated heat input capacity”;
- Using consistent nomenclature when referring to “consensus methods” or “industry standard practices”; and,
- Clarifying high heating value (HHV) requirements for natural gas systems where frequent samples are available.

Additional details are provided below for these three issues.

(1) Revise the definition of *maximum rated heat input capacity*:

In Subpart A §98.6, the definition for *maximum rated heat input capacity* is based solely on manufacturer specifications. For existing equipment, this definition may be inappropriate or difficult to address. For example, an existing combustion device could have been uprated or derated subsequent to initial installation, or manufacturer information may not be available for some existing equipment. In instances where a derate or uprate has occurred, as is commonly done to gas turbine ratings to account for site-specific ambient conditions, the heat input capacity may be included in a permit, and that capacity may differ from the manufacturer specifications. To avoid unnecessary confusion and also address the situation where manufacturer information is not readily available, INGAA recommends revising the definition as follows (with **new text bold and underlined**).

“Maximum rated heat input capacity means the hourly heat input to a unit (in mmBtu/hr), when it combusts the maximum amount of fuel per hour that it is capable of combusting on a steady state basis, as of the initial installation of the unit, as specified by the manufacturer. **If the manufacturer specification is not available or site capacity differs (e.g., due to site-specific conditions that result in unit uprate or derate), then the capacity reflected in a permit can be used. If a permitted value is not available, capacity defined by the operator can be used.**”

(2) Nomenclature for referring to consensus methods and industry standard practices:

INGAA approves of several revisions in the Proposed Rule regarding methodologies and practices that are acceptable. For example, to determine heating value, §98.34(a)(6) is revised to indicate that, “You may use a method published by a consensus standards organization if such a method exists, or you may use industry consensus standard practice to determine the high heat values.” This general reference to consensus methods is preferable to the original rule requirements, which provided a long list of specific allowable methods. INGAA approves of this change. In addition, the Proposed Rule references “industry standard practices” for procedures such as flow meter calibration, and INGAA agrees that industry standard practices should be acceptable for addressing reporting rule requirements.

However, the Proposed Rule does not apply consistent nomenclature when referring to methods or procedures, and this could cause confusion. For example, in addition to referencing “consensus methods” or “industry standard practices”, Subparts A and Subpart C also use the following terms: “industry consensus standard method”; “industry consensus standard practice”; “industry consensus standard”; “industry consensus calibration schedule”; and, “industry-accepted or industry consensus standard calibration practice”.

INGAA understands that rule requirements regarding “methodology” in Subparts A and C generally follow one of three criteria: (1) consensus method (from a standards organization); (2) manufacturer specification; and/or (3) industry standard practice. For clarity, methodologies should be consistently referred to using the same nomenclature and INGAA recommends these three terms.

In addition, INGAA strongly recommends accepting “industry standard practices” as an option for flow meter calibration in Subpart A and Subpart C, and gas analysis / heating value measurement in Subpart C. Requirements in Subpart A and Subpart C for flow meter calibration (or associated temperature or pressure calibration) include confusing text noted above (e.g., “industry consensus standard practice”). When revising the text, EPA should ensure that “industry standard practices” are retained as an acceptable approach for flow measurement and calibration – including calibration frequency. Similarly, references related to fuel sampling and analysis in Subpart C use inconsistent nomenclature. When revising for consistent nomenclature, “industry standard practice” should be included as an acceptable approach for natural gas sampling and analysis, including heating value analysis. Company procedures consistent with industry standard practice will be documented in the GHG monitoring plan.

(3) Analysis and averaging for HHV from natural gas where frequent samples are available:

For natural gas systems, frequent HHV analysis will often be available in association with existing gas chromatographs that monitor gas quality. For Subpart C, §98.34(a)(4) requires that “all valid fuel analyses” be used in GHG emission calculations. In some cases, existing operational practices include regular sampling (e.g., multiple sample in a day or hour) using gas chromatography (GC) to determine gas properties, including HHV. Thus, the rule essentially penalizes operators for having plentiful data by requiring implementation of new “data handling” procedures for HHV averaging and for addressing missing data.

Existing GC instruments and operating procedures follow standard operating practices and the associated accuracy meets the accuracy objectives for GHG reporting. To avoid confusion and unnecessary burden regarding criteria for natural gas HHV sampling, the requirements for natural gas analysis should be clarified. Current practices should be accepted to avoid the need to develop new computer algorithms that specifically follow Subpart C calculation methodology. Averaging or reporting data at high frequency should not be required and Part 98 missing data algorithms should not be required because this added burden is not warranted.

INGAA recommends that operators be allowed to use existing averaging procedures. In addition, many sites have gas quality that does not vary significantly. In those cases, a single monthly natural gas analysis result provides an accurate means to estimate emissions and a single

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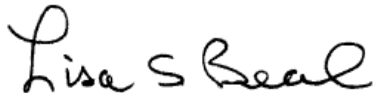
analysis from within the month should be allowed to determine HHV for natural gas. The methods and data averaging used can be identified in the GHG Monitoring Plan.

To address this, §98.34(a)(4) should be revised, and INGAA recommends the following:

“(4) If, for a particular type of fuel, HHV sampling and analysis is performed more often than the minimum frequency specified in paragraph (a)(2) of this section, the results of all valid fuel analyses shall be used in the GHG emission calculations. **For natural gas-fired sources with multiple HHV samples and analyses within a single month, operator procedures or a single analysis from the month can be used to determine HHV. The procedure used to determine HHV shall be identified in the GHG Monitoring Plan required in §98.3(g)(5). For natural gas-fired sources, operator procedures can include alternative missing data procedures to those specified in §98.35.**”

INGAA appreciates your consideration of these comments and looks forward to your response. Please contact me at 202-216-5935 or lbeal@ingaa.org if you have any questions. Thank you.

Sincerely,



Lisa Beal
Director, Environment and Construction Policy
Interstate Natural Gas Association of America

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