Interstate Natural Gas Association of America

December 9, 2015

Via www.regulations.gov and email

Attention Docket Number EPA-HQ-OAR-2014-0292
Environmental Protection Agency
Mail Code: 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket Number EPA-HQ-OAR-2014-0292: INGAA Comments on EPA Proposed Revisions to Test Methods, Performance Specifications, and Testing Regulations for Air Emission Sources

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 in response to the Environmental Protection Agency's (EPA) proposed rulemaking (Proposed Rule), "Revisions to Test Methods, Performance Specifications, and Testing Regulations for Air Emission Sources." The Proposed Rule was published in the Federal Register on September 8, 2015 at 80 FR 54146. This action proposes technical and editorial corrections and revisions to regulations related to stationary source emissions testing, such as NSPS and NESHAP performance tests.

INGAA's members represent the vast majority of the interstate natural gas transmission pipeline companies in the United States, operating approximately 200,000 miles of pipelines, and serving as an indispensable link between natural gas producers and consumers. INGAA and its members have a long history of working collaboratively with a variety of stakeholders on emissions issues related to equipment such as natural gas-fired reciprocating internal combustion engines (RICE) and combustion turbines. This includes extensive and long-term engagement with the EPA Office of Air Quality Planning and Standards (OAQPS) staff responsible for developing NSPS and NESHAP regulations for RICE and turbines, including the spark-ignition internal combustion engine NSPS (40 CFR, Part 60, Subpart JJJJ). INGAA members will be directly impacted by the Proposed Rule, especially proposed revisions to delete currently allowed test methods for VOC emission tests required by Subpart JJJJ.

EPA indicates that the Proposed Rule does not impose substantive new requirements on source owners or operators. However, since Subpart JJJJ was adopted in 2008, many operators and their service providers have conducted numerous Subpart JJJJ VOC tests using methods that EPA proposes to delete from the rule. The companies will incur significant costs if that proposed revision is retained in the final rule.

COMMENT ON PROPOSED REVISIONS TO SUBPART JJJJ VOC TEST METHODS

1. **INGAA strongly recommends that EPA retain the Subpart JJJJ test methods for VOC measurement, including extractive FTIR methods (EPA Method 320 and ASTM D 6348-03) and EPA Method 18.**

Subpart JJJJ requires compliance tests for NOx, CO and VOC emissions, and the test methods are identified in Table 2 of Subpart JJJJ. For VOC tests, the Proposed Rule eliminates EPA Method 18, EPA Method 320, and ASTM D 6348-03. The vast majority of engines subject to Subpart JJJJ are natural gas-fired, and test methods were included in the 2008 rule that allow VOC to be determined by measuring and summing individual species that comprise VOCs (e.g., butane, propane, etc.). The other allowed method, EPA Method 25A, determines VOC by measuring total hydrocarbon (THC) and subtracting methane and ethane, which are not VOCs. EPA Method 25A would be the only method remaining if the proposed revisions are adopted. In October 2006, INGAA and others submitted extensive comments on the original Subpart JJJJ rulemaking regarding VOC test methods for natural gas-fired engines. INGAA submitted comments to docket document number EPA-HQ-OAR-2005-0530-0157.

In response to comments and based on extensive technical discussions in 2006 and 2007, EPA chose to include Method 18 and the two FTIR test methods in the final rule. Since then, operators and testing companies have invested in the associated equipment, including relatively costly FTIR systems. While the "first costs" for FTIR systems may exceed other methods, some companies chose that methodology because long-term costs may be lower. FTIR methods allow all three Subpart JJJJ pollutants to be measured with a single method and instrumentation. Other allowed test methods require multiple instruments, additional calibration gases, and more time to complete tests. Since the January 2008 final rule, thousands of Subpart JJJJ VOC tests have been completed using Method 18 or the FTIR methods.

An EPA Technical Memorandum dated September 18, 2015[1] explains EPA's rationale for proposing to remove these methods. While the memo raises some technical concerns regarding the methods that EPA proposes to delete, some of those same concerns (e.g., analytical response factors for specific compounds) also apply to the VOC method that would remain – EPA Method 25A. EPA expresses concerns regarding the hydrocarbon species to include in the sum of total VOC, but that issue can be addressed by collecting and reviewing available information from Subpart JJJJ performance tests that have been conducted in the last seven years.

The proposal to remove Method 18 and the FTIR methods from Subpart JJJJ is not adequately supported by data or analysis, and does not consider technical issues for VOC measurement from natural gas-fired engines that may be better addressed by Method 18 and FTIR methods, as discussed further below. These methods should <u>not</u> be removed from Table 2 of Subpart JJJJ.

<u>Testing Experience</u>

EPA's primary concerns about the test methods that it proposes to delete include the lack of a discrete list of VOC species for engine emissions and the inability of EPA, "to provide adequate technical assistance to regulatory agencies that must make compliance determinations for Subpart JJJJ source with data collected using these methods." EPA Method 18, EPA Method

[1] "Proposal to remove EPA Methods 18, 320, and ASTM D6348-03 as acceptable methods for measuring total VOC under 40 CFR 60, Subpart JJJJ" Docket ID EPA-HQ-OAR-2014-0292-0008.

320, and ASTM D 6348-03 have been used to conduct thousands of Subpart JJJJ compliance tests over the past seven years. State and other regulatory agencies have approved numerous test plans and test reports associated with these tests. These plans and reports presumably identify a list of measured VOC species and a comprehensive description of test equipment, methods, procedures, and results.

The EPA docket memo does not indicate whether EPA has explored the numerous tests completed and whether those results identify an acceptable list of VOC species for tests of natural gas-fired engines. Further, it is unclear why EPA has "been unable to provide adequate technical assistance to regulatory agencies" in the last seven years. It is unclear to INGAA whether EPA has been unable to provide technical assistance to state agencies based upon its lack of resources, technical expertise, or prioritization. EPA should rectify this issue prior to considering rule revisions that reverse EPA's previous decision to include Method 18 and the FTIR methods in Subpart JJJJ.

VOC Emissions from Natural Gas-fired Engines are Predominately Simple Alkanes and Alkenes

The "pipeline quality" natural gas burned by INGAA members typically greater than 92 percent methane. Due to the fuel characteristics, the reciprocating engine exhaust hydrocarbon is nearly all methane and ethane, which are not VOCs. The balance of hydrocarbons that comprise VOC will predominately be simple alkanes and alkenes. Formaldehyde (which can be measured by FTIR) is not counted as VOC by Subpart JJJJ. INGAA comments on Subpart JJJJ in 2006 provided a rational list of VOC species that would account for the vast majority of species in the emissions from gas-fired engines. Since that document is available for EPA review, those comments are not repeated here but are incorporated by reference.

The list of hydrocarbons in the 2006 INGAA comments is supported by data from EPA's AP-42 emission factor document. Information being provided to the docket through the public hearing and comments also appear to support a similar list of hydrocarbons. For example, the October 2015 public hearing included presentations with example data. The hearing transcript[2] includes example data with similar VOC speciation, and methane and ethane accounting for the vast majority of hydrocarbons (>90%). The latter fact is important when considering discussion below regarding method performance and uncertainty associated with EPA Method 25A.

The EPA background document for the AP-42 section[3] for natural gas-fired reciprocating engines includes details on many hydrocarbon species. The detailed information for 2-stroke lean burn (2SLB) and 4-stroke lean burn (4SLB) engines includes a number of hydrocarbon species, and shows that alkanes through C_6 comprise greater than 90 percent of the total VOCs. Primary contributors to the remaining balance include oxygenated hydrocarbons such as methanol that can be measured with FTIR and that have a relatively poor response to the flame ionization detector (FID) used for EPA Method 25A. Table 1 summarizes AP-42 background documentation from tables 3.4-1 (2SLB) and 3.4-2 (4SLB) of the AP-42 document. Table 1 excludes other trace species included in the AP-42 tables that comprise less than 0.1 percent of the total hydrocarbon.

[2] Transcript of the Public Hearing for Revisions to Test Methods, Performance Specifications, and Testing Regulations; RTP, NC; October 8, 2015. Docket document number EPA-HQ-OAR-2014-0292-0017.

[3] AP 42, Fifth Edition, Volume I Chapter 3: Stationary Internal Combustion Sources, "Emission Factor Documentation for AP-42 Section 3-2, Natural Gas-Fired Reciprocating Engines." (July 2000)

Table 1: Summary of natural gas-fired engine hydrocarbon species from AP-42 support document.

Species	2-stroke lean burn engine					4-stroke lean burn engine				
	# tests	lb / MMBtu	% of total[A]	% of "VOC"[B]	Cumulative %	# tests	lb / MMBtu	% of total[A]	% of "VOC"[B]	Cumulative %
NMHC+C_1[A]	N/A	1.776	100.0%			N/A	1.416	100.0%		
NMHC	44	0.296	16.7%			18	0.106	7.5%		
Methane	36	1.48	83.3%			20	1.31	92.5%		
Ethane	23	0.0709	4.0%			6	0.105	7.4%		
Propane	4	0.0287	1.6%	67.3%	67.3%	5	0.0419	3.0%	84.9%	84.9%
Butane	3	0.0048	0.3%	11.3%	78.6%	2	0.00054	0.0%	1.1%	85.9%
Isobutane	3	0.0038	0.2%	8.9%	87.5%	N/A	N/A	0.0%	0.0%	85.9%
n-Pentane	4	0.0015	0.1%	3.5%	91.0%	5	0.0026	0.2%	5.3%	91.2%
n-Hexane	9	0.0004	0.0%	0.9%	92.0%	5	0.0011	0.1%	2.2%	93.5%
n-Octane	4	0.0001	0.0%	0.2%	92.1%	3	0.0004	0.0%	0.7%	94.2%
n-Nonane	3	0.0001	0.0%	0.1%	92.3%	3	0.0001	0.0%	0.2%	94.4%
1,3-Butadiene	16	0.0008	0.0%	1.9%	94.1%	1	0.0003	0.0%	0.5%	94.9%
Methanol	43	0.0025	0.1%	5.9%	100.0%	15	0.0025	0.2%	5.1%	100.0%

[A] Total hydrocarbon (THC) not included in AP-42. Total based on NMHC + methane.

[B] VOC based on sum of C_{3+} species presented. See AP-42 document for additional trace hydrocarbon species with minimal impact on total VOC.

For both engine types, four C_3 through C_5 species comprise over 91 percent of the total – propane, butane, isobutene, and n-pentane. Methanol (5 to 6%) and 1,3-Butadiene (<2%) comprise most of the balance. For EPA Method 25A tests, the FID analyzer will exhibit a relatively poor response to methanol, so that species would be under-reported by EPA's "preferred" method.

New information in the docket (e.g., a public hearing presentation by Prism Analytical) includes similar VOC species as the AP-42 document. A table in slide 13 of that presentation shows 20 FTIR test runs from eight engines, and methane and ethane account for over 90 percent of the THC in all cases. The data also show that several species account for nearly all VOCs.

This limited review and discussion indicates that a discrete number of species that can be accurately measured using FTIR account for nearly all of the VOC constituents for gas-fired engine emissions. With many Subpart JJJJ tests completed in recent years, clearly data is available to document and justify a list of species to include in the VOC determination for gas-fired engines.

Method 25A VOC Measurement Uncertainty

EPA also does not consider a technical concern regarding engine measurements. As discussed during Subpart JJJJ rule development, the methods that add individual species, and that EPA proposes to delete, may provide better quality data than EPA Method 25A. VOC measurement by Method 25A requires a THC measurement using a Method 25A FID analyzer; measurement of methane and ethane by FTIR, Method 18, or a FID with a methane cutter; and subtraction of the methane and ethane from the THC to determine VOC. For gas-fired engines, where the fuel is nearly all methane and ethane, hydrocarbons in the engine exhaust are primarily these two fuel constituents, and the calculated VOC is the difference between two large numbers (THC minus

methane + ethane). Thus, small errors in the THC, methane, and ethane measurements that are well within method accuracy targets can result in large errors in the calculated VOC emissions.

While the INGAA 2006 comments on the proposed rule include a detailed discussion on this topic, a simple mathematical exercise can be used to illustrate the issue. For natural gas-fired exhaust, methane and ethane will typically account for over 90 percent of the exhaust THC. So, for example, if THC is measured at 1000 ppmv (with accuracy of ±2% or 20 ppmv) and methane and ethane total 950 ppmv (with accuracy of ±2% or 19 ppm), the difference of 50 ppmv is similar in magnitude to the accuracy of the two measurements. Thus, there can be significant error in the resulting VOC determined by subtracting two similar measured values. In contrast, FTIR and Method 18 measure individual species with greater absolute accuracy (e.g., single digit ppm measurement of various hydrocarbons that comprise VOC). While available data can support a discrete list of species to include in total VOCs for gas-fired engines, even if a trace hydrocarbon constituent is not included in the list of VOCs for FTIR methods and Method 18. Consequently the relative impact (i.e., likely less than a ppm) is minimal compared to the uncertainty associated with the difference calculated by subtracting two similar measured values when using Method 25A.

Cost Implications Associated with Deleting Accepted Test Methods

Many companies have made large investments in FTIR and gas chromatography (Method 18) equipment for Subpart JJJJ testing. Reasons for this decision include the ability to measure all Subpart JJJJ regulated pollutants (NOx, CO, VOCs) with one analyzer, lower operating costs associated with the time necessary to complete quality assurance checks such as calibrations, and reduced costs associated with the number of calibration gases required. In addition, FTIR does provide and Method 18 (in-line GC) can provide real-time data for these measured pollutants. The FTIR methods also provide the ability to measure other pollutants such as formaldehyde, which may be required for state permit or other reasons.

Although FTIR analyzers are a larger initial investment than Method 25A monitors, many companies have determined that FTIR testing is a preferred approach due to the lower per test costs. For example the costs are often lower due to shorter test day and because of lower compressed gas requirements. Additionally INGAA notes that the preferred approach provides real-time data along with more accurate and reliable test data (as discussed above). Comments from several parties submitted to the docket immediately after the rule was proposed provide examples of source test contractor positions regarding issues such as test timing and test costs. For example, see the following docket documents: EPA-HQ-OAR-2014-0292-0004, -0012, and 0024[4][5][6].

Promulgation of the proposed rule would cause testing companies using the deleted methods to make additional equipment investments (that would be passed on to engine operators) and implement procedures that result in more expensive tests (i.e., using multiple test methods, longer days, more calibration gases). In the preamble of the Proposed Rule, EPA states, "These revisions will improve the quality of data and provide testers flexibility to use recently approved

[4] EPA docket document number EPA-HQ-OAR-2014-0292-0004. Letter from Representative Frank Lucas to Gina McCarthy on behalf of Oklahoma emissions testers and operators. September 21, 2015
[5] EPA docket document number EPA-HQ-OAR-2014-0292-0012. Letter from Great Plains Analytical Services, Incorporated to EPA. September 17, 2015.
[6] EPA docket document number EPA-HQ-OAR-2014-0292-0024. Letter from GHD Services Incorporated to EPA. November 9, 2015

alternative procedures… they will not impose new substantive requirements on source owners or operators." It does not appear that EPA has adequately considered the costs or the data quality consequences associated with the proposed revision.

Other Concerns with EPA Memo on FTIR and Method 18

The EPA Technical Memorandum includes other deficiencies and inconsistencies, including:

- The concerns about variability in exhaust speciation for fuels such as No. 2 diesel expressed in the EPA memo are irrelevant conjecture. A different NSPS applies to diesel engines (Subpart IIII) and raising concerns about fuel-induced variability in VOC speciation for fuels not covered by the rule is inappropriate. The VOC profile from diesel-fired engines should not be a consideration for evaluating the suitability of the Subpart JJJJ test methods.
- EPA believes that a standard list of response factors (relative to propane) should be developed for VOC measured by Method 18 or FTIR methods. This same issue applies for subtracting methane and ethane (measured by Method 18 or FTIR methods) from THC measured as propane by Method 25A (EPA's preferred test method). Response factors could be a more important issue for Method 25A due to the errors associated with measurements by difference discussed above (i.e., response factors different than 1.0 could compound the Method 25A measurement by difference errors discussed above).

INGAA reiterates its strong recommendation that EPA *not* delete EPA Method 18, EPA Method 320, or ASTM D 6348-03 from Subpart JJJJ. Any potential concerns could be addressed by collecting information to develop guidance that improves future testing and data analysis. This could include collecting and reviewing available data and procedures from numerous tests that have been completed using these methods since Subpart JJJJ was adopted in 2008.

If EPA remains unconvinced that the FTIR methods and Method 18 should be retained, then additional analysis should be conducted to understand the cost and technical implications of the proposed revision. Rather than embarking on such an initiative, a better dedication of EPA resources would be to develop a discrete list of hydrocarbon species for Subpart JJJJ VOCs based on the numerous tests that have been completed in the last seven years.

MISCELLANEOUS COMMENTS ON OTHER TEST METHODS AND REPORTING

2. The preamble discusses revisions to EPA Method 7E stratification and cyclonic flow tests which do not appear to be included in Proposed Rule text. Method 7E requirements for stratification and cyclonic flow should not be revised without additional justification and the opportunity for stakeholder comment on the specific revisions proposed.

Any revision to EPA Method 7E would have broader implications, because Method 7E is referenced for other instrument test methods (e.g., CO, O2) in addition to NOx tests. In Section IV of the preamble (80 FR 54150), EPA requests comments on potential changes to EPA Method 7E that would add new requirements for evaluating exhaust for stratification or cyclonic flow. The discussion concludes with the following:

> "…**In this rule, we propose to update the General Provisions of parts 60, 61, and 63 to include evaluations of gas stratification and cyclonic flow with all compliance tests. The**

Agency solicits comments and data to aid in establishing effective and equitable procedures." [emphasis added]

While the statement implies revisions to the General Provisions are proposed in this rulemaking, that is not the case because revised text is not included in proposed rule changes. Perhaps EPA meant to indicate that it is considering updates to the General Provisions depending on comments received. If EPA needs data and information to assess whether to adopt new requirements for evaluating exhaust flow, then EPA should engage stakeholders in a process that collects information, evaluates the information, and then proposes (as needed) new requirements. New requirements should *not* be added to the final rule without the opportunity for stakeholders to comment on the specific revisions proposed.

INGAA has not had the opportunity to evaluate this EPA request more thoroughly, but is concerned that revising stratification and cyclonic flow tests could have significant implications for costs and time required to complete tests. This may be especially important for reciprocating engines, where exhaust flow attributes associated with pulsation characteristic to an engine exhaust could be misconstrued as stratification. An engine exhaust exhibits different characteristics than other sources, and incorrect conclusions could be reached if the evaluation process does not consider the specific attributes of reciprocating engine exhaust.

Compared to larger sources (e.g., utility boilers, large combustion turbines), an engine exhaust duct is smaller and less subject to flow anomalies that result in "non-uniform" measurements. The characteristics of exhaust pulsations are more pronounced for lower speed units, which are common in gas transmission applications. For engines, the exhaust flow may be very well mixed but not be conducive to stratification or cyclonic flow tests that are designed for units with steady state combustion (and steady flows – as opposed to the repetitive on and off combustion events that occur in internal combustion engines and result in exhaust pulsation). Significant new costs could be introduced for pipeline transmission sector engines tests without need or justification.

EPA also requests comment on using the regulated pollutant (e.g., NOx) rather than a diluent (e.g., O_2 or CO_2) for evaluating flow. INGAA does not support such a requirement. Exhaust pulsation for internal combustion engines can results in measurement variations that are not indicative of a poorly mixed exhaust. In addition, as technology results in lower exhaust emission standards (e.g., less than 100 ppmv in many cases and less than 10 ppmv in some cases), variability in exhaust pollutant measurements may be more attributable to test method limitations than an indication of non-uniform exhaust flows. Measuring diluents should be allowed for any required exhaust flow tests.

If EPA introduces new requirements, it is imperative that a wide range of exhaust systems be thoroughly investigated and appropriate performance metrics defined depending on the system. For example, characteristics of 1,000 horsepower reciprocating internal combustion engine exhaust are quite different than for a large utility turbine in terms of both the physical size of the duct and the flow characteristics. Revisions to Method 7E could result in *unnecessary requirements* for many engines to conduct a multi-point, multi-traverse emissions test. Cost implications could be very large, as significant additional field resources could be required to adjust the sample probe location continually. Any consideration of revisions should thoroughly examine a range of source types to assure that various flow regimes (e.g., pulsation) are understood and addressed.

3. EPA has not justified changes to EPA Method 4, Section 16.4 that require a fuel sample to be taken "during the test run," and also require oxygen measurement "by method 3A or 3B during each test run." Additional flexibility should be included in the final rule.

Method 4 is used to measure moisture in exhaust gases. The proposed rule revises Method 4, Section 16.4 to require that a fuel sample be taken during the run and analyzed. The current method allows use of published F-factors from EPA Method 19, Table 2. "Pipeline quality" natural gas burned at transmission compressor stations will exhibit an F-factor very similar to the "typical" values in Method 19. EPA has not assessed the benefits (e.g., nominal improvement in results) or costs to justify this change. In the preamble, EPA indicates this is a "clarification." It is not a clarification. It is a new requirement.

The proposed revision also requires that oxygen be measured using Method 3A or 3B – excluding other accepted consensus methods. Other methods for oxygen measurement are allowed in current regulations, including the use of ASTM D 6522 in several federal standards. With the proposed revision, EPA undermines test method criteria in other regulations (e.g., NSPS) and fails to consider consensus test methods from other organizations (e.g., ASTM) that are currently allowed by EPA rules. Additional flexibility for oxygen measurement is warranted.

EPA should not finalize the proposed revisions and should retain the current Method 4 criteria. If EPA adds new requirements, it should justify the basis for the change and the demonstrated need. At a minimum, additional flexibility should be provided to allow:

- The use of accepted test methods for oxygen measurement, such as ASTM D 6522 (see Table 2 of Subpart JJJJ).
- Rather than requiring a fuel sample "during the test run," the operator should be allowed to use an available fuel analysis (e.g., daily value from a nearby analyzer) that can be reasonably explained as representative of fuel quality during the test.
- The operator should be able to demonstrate through multiple tests (e.g., periodic fuel samples taken for other purposes) a site F-factor based on fuel analysis that is representative of site fuel quality, or demonstrate that the Method 19 published F-factors are representative of site fuel quality. Many compressor stations handle gas with little variability in fuel quality and/or may have analysis requirements as part of contractual obligations for other purposes. That information will likely be more than adequate to demonstrate the F-factor. Additional analysis from a sample during the test is not warranted.

4. The Proposed part 60 and 63 General Provisions requirements for reporting: (1) Should only apply to electronic submissions; (2) Should only apply to those requirements currently included in EPA's electronic reporting tool; and (3) Should not add new data or information to test reports.

The Proposed Rule would revise the General Provisions of part 60 and part 63 to add new requirements for the content of test reports. Revisions that impact reporting can introduce burden by adding new, detailed components to be included in performance test reports, or due to ambiguous requirements. In this case, for reporting through the EPA Electronic Reporting Tool (ERT) or for hard copy reports, differences between the new data element requirements and those currently employed (e.g., in the ERT system; in standard templates for hard copy reports) would increase burden and should be justified.

EPA asserts that the proposed amendments are clarifications and do not add new information collection requirements, but that is not the case. The list of data elements includes information not currently in the ERT or standard for hard copy reports. INGAA recommends that EPA more actively engage stakeholders in designing and implementing standardized formats for electronic reporting. INGAA is also concerned that some proposed data elements are not clearly defined.

Since EPA intends to migrate from hard copy reports to electronic reports, any proposed changes should only apply to electronic submittals. For e-reports, the data fields should be clearly defined, developed with stakeholder input, and implemented through defined fields in the ERT. Only necessary fields should be included. For example, some of the proposed requirements are not typically included in current hardcopy reports (e.g., the Federal Registry System (FRS) number for the facility[7] and the source classification code (SCC)). Thus, if revisions are applicable to hardcopy reports, INGAA recommends those two items only be required for electronic submissions where search features can be included in the electronic tool.

Additional new information is included in the proposal, such as requirements to *describe* sampling, analysis and quality assurance procedures and to provide example calculations. Applicable methods and regulations generally address these issues and the information is either included or referred to in test reports based on the methods cited. Since these criteria are established within the methods, mandating an additional "description" and example calculations in the report are not warranted.

Similarly, the Proposed Rule includes details related to process information or parameters that are not clearly explained. Required process parameters should be limited to a narrow list relevant for the testing. For example, the Proposed Rule requires a brief process description and a "complete unit description, including a description of feed streams and control devices." Another example is the proposed requirement to identify "any process parameter component."

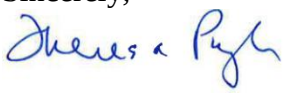
EPA's ambiguous requirement descriptions could result in misinterpretations and unnecessary costs incurred by the pipeline sector companies. For example, Subpart JJJJ tests are discussed in these comments. For those tests, the affected unit is a reciprocating internal combustion engine. That engine could be at a large facility and considered to be part of a larger or extensive "process" that includes "feed streams" unrelated to engine operation and emissions. The implied requirements are unclear, but the only process information that should be required are the parameters associated with engine operations that pertain to the emissions test, such as the fuel (e.g., natural gas), the fuel rate, and the operating load (e.g., percent of rated horsepower). Relevant emission controls and test (emissions) results are examples of the other pertinent information. Other process related information or feed streams are not relevant to the affected unit or the test and should not be required. A requirement for a "complete unit description" or identification of "any process parameter component" is ambiguous and unnecessary.

In summary, INGAA is concerned that proposed General Provision revisions to implement consistent electronic reporting add new and unnecessary data fields that have not been adequately vetted with stakeholders, and could result in new and unexpected burdens due to the addition of new requirements and ambiguity for some of the data elements. INGAA recommends additional effort to review and standardize test report contents with stakeholders.

[7] The FRS identifier(s) may not be known and is not commonly included in test reports.

INGAA appreciates your consideration of these comments and those comments submitted in prior calls for comments that are incorporated by reference. Please contact me at 202-216-5955 or tpugh@ingaa.org if you have any questions.

Sincerely,



Theresa Pugh
Vice President, Environment, Health and Construction

cc: Melanie King, USEPA, Office of Air Quality Planning and Standards