



Interstate Natural Gas Association of America

October 27, 2016

Via www.regulations.gov and email

Attention Docket ID Number EPA-HQ-OAR-2016-0204
EPA Docket Center (EPA/DC)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-OAR-2016-0204 – INGAA’s Response to EPA’s Information Collection Request for Oil and Gas Facilities Submitted to OMB for Review and Approval

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) notice, “Information Collection Request Submitted to OMB for Review and Approval; Comment Request; Information Collection Effort for Oil and Gas Facilities” (Proposed ICR). The notice published on September 29, 2016 (81 Fed. Reg. 66,962) indicates that EPA has submitted the Proposed ICR to the Office of Management and Budget (OMB) for review and approval, and provides a second opportunity for public comment. INGAA previously submitted comments on the initial ICR notice published on June 3, 2016 (81 Fed. Reg. 35,763). The Proposed ICR will significantly affect INGAA members, and INGAA welcomes the opportunity to comment.

Natural gas provides 25 percent of the basic energy needs in the United States. 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. The North American natural gas pipeline system is an energy highway integral to U.S. energy infrastructure. INGAA and its members have a long history of working collaboratively with a variety of stakeholders on air quality and greenhouse gas (GHG) issues, including on methane. INGAA appreciates your consideration of these comments. Please contact me at 202-216-5955 or ssnyder@ingaa.org if you have any questions.

Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Sandra Y. Snyder".

Sandra Y. Snyder
Regulatory Attorney for Environment & Personnel Safety

cc: Joe Goffman, U.S. EPA (via email)
Brenda Shine, U.S. EPA (via email)
Bruce Moore, U.S. EPA (via email)
OMB Desk Officer for EPA (via email)

**INGAA RESPONSE TO EPA NOTICE,
“INFORMATION COLLECTION REQUEST SUBMITTED TO OMB FOR
REVIEW AND APPROVAL; COMMENT REQUEST; INFORMATION
COLLECTION EFFORT FOR OIL AND GAS FACILITIES”**

81 Fed. Reg. 66,962 (Sept. 29, 2016)

Submitted: October 27, 2016

The Interstate Natural Gas Association of America (INGAA) respectfully submits these comments in response to the EPA Notice, “Information Collection Request Submitted to OMB for Review and Approval; Comment Request; Information Collection Effort for Oil and Gas Facilities” (Proposed ICR).

Executive Summary

EPA has issued the ICR to better understand existing sources in the oil and gas industry before embarking on an effort to develop standards of performance for existing oil and gas sources. INGAA offers the following comments on the second draft of the Proposed ICR, which is intended to provide another opportunity for a better data collection effort and contribute to more informed rulemaking while reducing industry burden. Rulemaking should be based on the best available data, and much of the information is already available to EPA. INGAA is committed to working with EPA to ensure the best and most appropriate information is collected while minimizing the burden on the industry.

In the pages that follow, INGAA provides suggestions to address the issues that it has identified, including reiterating some issues identified in INGAA’s previous comments. Some of INGAA’s key comments include:

1. INGAA remains concerned that EPA has significantly underestimated the costs associated with the Proposed ICR. A more accurate cost estimate would very likely conclude that the cost of complying with the Proposed ICR will exceed \$100 million, making this action economically significant and requiring a more detailed assessment of costs and benefits.
2. INGAA remains concerned that the proposed schedule will require that responses to the Part 2 survey be submitted within 120 days. EPA’s recent revisions to the Part 2 survey added approximately 160 new data elements which further exacerbates INGAA’s concerns about having sufficient time to respond to the ICR. Additional time is necessary to complete such comprehensive surveys for the hundreds of affected facilities.
3. Additional revisions need to be made to the Proposed ICR to ensure the practical utility of the data collected. The revised version of the Part 2 template released in late September includes revisions in response to comments submitted on the initial draft. However, many data elements are still unclear. Without further clarity, the responses submitted would be of questionable value and/or limited practical utility. In many cases, in order to respond to EPA’s question, recipients would need to use subjective judgment, meaning that questions could be interpreted inconsistently. In addition, some data elements are unavailable or would be, at best, a guess or estimate. Similar to our previous comments, INGAA recommends changes to the data elements requested in Part 2 to ensure clarity in the request, and utility of the data submitted.
4. INGAA remains concerned that the Proposed ICR introduces new and/or different definitions than the definitions for the same or similar terms in existing regulations – i.e., the Greenhouse Gas Reporting Program (GHGRP) or oil and gas NSPS (40 C.F.R. Part 60, Subpart OOOOa). At a minimum, the industry segments should be consistently defined. In some cases, minor differences exist between Subpart OOOOa and GHGRP segment definitions and associated descriptions. The ICR should not introduce a third definition.

5. Among other things, the Proposed ICR requests information on equipment and maintenance costs. All cost data should be classified as confidential business information (CBI). Similarly, all responses regarding whether sites are unmanned or the frequency of site visits should be treated as CBI because of security concerns.

Details on these key items and additional issues are included in INGAA’s comments below.

Detailed Comments

INGAA provides the following comments with additional detail on several key topics such as cost and schedule. The majority of INGAA’s comments are itemized in tabular form in Attachment 1, which summarizes comments in several topical areas including:

- Schedule implications for requested data;
- Burden associated with data collection;
- Information quality (e.g., ambiguity in data request) or relevance;
- Duplicative information;
- Confidentiality;
- Requested clarifications; and
- Typos and template format or layout.

1. Schedule: More than 120 days are needed to complete the Part 2 survey.

INGAA remains concerned with the proposed schedule to complete the Part 2 survey. INGAA’s concerns are detailed in its August 2, 2016 comment letter.¹ Many other stakeholders expressed similar concerns. In its response to comments document,² EPA stated: “While EPA acknowledges commenters’ concerns with completing the ICR within the required timeframe, the response deadline will remain at 30 days (Part 1) and 120 days (Part 2)” EPA’s response fails to address detailed concerns expressed by INGAA and many other stakeholders, particularly those who are not in the onshore production sector (whose concerns EPA addressed separately).

While INGAA and other stakeholders provided thorough, detailed comments on issues associated with meeting a 120-day schedule for the Part 2 survey, EPA has not provided meaningful responses to those comments or justified the imperative of maintaining a 120-day schedule to submit responses. INGAA’s initial concerns about the cost of compliance and timing have been exacerbated by EPA’s addition of approximately 160 data elements in the September version of the Part 2 request.

¹ EPA-HQ-OAR-2016-0204-0054.

² EPA-HQ-OAR-2016-0204-0125.

2. Costs: EPA has underestimated the costs imposed by the ICR. EPA should provide OMB, stakeholders, and the public more accurate costs. Further analysis would likely show that the total cost estimate significantly exceeds EPA’s estimate. Such an economically significant action warrants a more detailed review of costs and benefits.

INGAA’s August 2, 2016 comment letter provides a detailed review of costs for the transmission and storage (T&S) segments. While EPA has reduced the number of facilities that will receive the ICR by 15%, the late September versions of the draft Part 2 survey adds (or clarifies) data requirements, and those changes will increase costs. EPA has estimated that the cost to comply with the Proposed ICR is approximately \$38 million. INGAA has previously indicated that the actual costs for T&S are 4.4 times higher than EPA’s estimate. (See INGAA’s August 2, 2016 comment letter). Stakeholders from other segments also submitted comments explaining that EPA underestimated the costs. Altogether, when these underestimated costs are corrected, it is very likely that the cost to comply with the Proposed ICR will exceed \$100 million. Thus, this is an economically significant action and warrants more thorough analysis of the costs and benefits. (See comment 1 – i.e., EPA’s response to comments document does not adequately respond to detailed comments on scheduling issues, which will increase costs to comply).

Because the Proposed ICR is actually a significant action, a more thorough analysis of costs and benefits is warranted. Many of INGAA’s comments provided in Attachment 1 address related issues on the relevance or need for requested data, data quality, and other issues associated with vetting the data requested – e.g., avoiding duplication. A more thorough analysis of the comments and comprehensive response to comments will result in additional vetting of data requests and will identify underlying issues associated with the practical utility of the data, as well as the costs to obtain the data.

3. Additional revisions to the Part 2 survey are required.

The late September version of the Part 2 survey includes some revisions in response to comments submitted on the first draft of the Proposed ICR, which was issued in early August. However, many data fields are still unclear, data are unavailable, or gathering the data would require significant resources with limited benefit. INGAA recommends clarification and revisions to several of the data elements requested in the Part 2 survey. Detailed comments are provided in Attachment 1 and in INGAA’s August 2, 2016 comment letter.

4. Best available data and/or blank fields in ICR response.

Many comments in Attachment 1 (and in INGAA’s August 2, 2016 comment letter) identify concerns associated with data availability and associated data quality. EPA’s response to comments document addresses this topic with responses such as, “Companies should provide best available data when responding to the ICR.”

INGAA appreciates this approach, but EPA has not addressed the underlying issues related to data quality and the relevance or practical use of the data. Many such data fields are highlighted in Attachment 1 and INGAA’s previous comments. For example, for data such as “pneumatic device malfunctions,” operators do not maintain records of this information. Therefore, respondents will likely report “0” or enter an estimate that is not tied to actual operations. This will result in inconsistent reporting, ambiguity, or meaningless results. Even more troubling,

using this data could result in EPA drawing inappropriate conclusions if it is used as the basis of a future rulemaking.

In Attachment 1, INGAA has noted questions regarding data relevance and data quality in the “Comment Topic” and “Impact” columns. EPA should vet all the data fields and remove any fields that provide little or no practical utility. This will reduce recipient costs, and minimize the instances where providing “best available data” results in EPA receiving data that is nothing more than guesswork.

5. Confidential Business Information (CBI).

In Attachment 1, INGAA has noted data which should be maintained as CBI to either avoid causing competitive harm or for safety and security reasons.

Attachment 1: INGAA Comments and Recommendations by Topic

Comment Topic	Location in ICR	INGAA Comment	INGAA Recommended Action	Impact
Burden / Economic Significance	Supporting Statement, Attachments 4 and 5	The actual re-estimated burden of this ICR is >\$100 million but EPA has significantly underestimated the costs. (See INGAA’s August 2, 2016 comments for more detailed cost discussion and specific examples of how EPA underestimated these costs).	Adjust estimates for accuracy and integrity of ICR to reflect need for OMB review of major rulemaking. (See INGAA August 2, 2016 comments for more details). Allow industry experts to assist in clarifying and defining data fields in ICR spreadsheets to support accurate information at the least cost.	Costs of both EPA and industry efforts are underestimated. Action warrants review as a major rulemaking (costs likely to exceed \$100 million).
Burden / Economic Significance / Schedule	Part 2 template – throughout (see several examples in next cell)	The Part 2 template currently includes many “broken” data fields (e.g., entry is not possible) or incomplete links, which will result in costs when recipients attempt to complete survey. If these are not 100% fixed, time and resources will be spent troubleshooting, requesting corrections, etc. Examples: Pneumatics, Rows 36, 37 Dehy, row 12 Tanks: Information in Table 2 should pre-populate Tables 3 and 4.	EPA should complete a thorough QA of the Part 2 template to ensure complete functionality for all data fields. “Beta testing” is warranted, including pre-population of data (from GHGRP), as well as a sandbox trial of e-GGRT to verify the uploaded facilities.	Cost and Schedule Data Quality
Burden / Schedule / Information Quality	Supporting Statement, Attachment 4 (Industry Cost Estimates)	The time and cost estimates for industry’s burden do not account for time to prepare for the ICR or scheduling, having a 2 nd person in field (for safety reasons), and the involvement of multiple corporate functions (operations, environmental, management, etc.) to accurately complete and review the results from the survey.	See INGAA’s August 2, 2016 comments for additional details on costs and survey execution.	Cost and Schedule Information Quality Potential safety concerns for field crews (if a 2 nd person is not available in the field to assist)

Comment Topic	Location in ICR	INGAA Comment	INGAA Recommended Action	Impact
Burden / Schedule	Supporting Statement, Section 5(d), Collection Schedule	<p>The allotted time (120 days) is insufficient to schedule, assign personnel, and gather the information. Year-end 2016/winter 2017 is already burdened with holidays, forced vacation, and other regulatory due dates (GHGRP, emission inventory, etc.). The collection of the ICR data at this time is further complicated by the need for collection during icy, cold and snowy winter conditions. EPA has underestimated the additional burden that will be imposed by selecting this schedule.</p> <p>EPA included many new data elements in second draft of the Proposed ICR and did not adjust its cost estimates.</p>	<p>Begin the ICR in 2017 and increase the time to respond to Part 2 to 180 days.</p> <p>In responding to comments, EPA notes, “While EPA acknowledges commenters’ concerns with completing the ICR within the required timeframe, the response deadline will remain at 30 days (Part 1) and 120 days (Part 2). . . .”</p> <p>EPA’s response fails to address detailed concerns expressed by INGAA and many other stakeholders. EPA has not justified retaining the 120-day schedule. It is in EPA’s best interest to allow adequate time for operators to obtain data if these data are to be used as the basis for future rulemaking. If EPA does not allow additional time to gather data, the responses EPA receives may create a weak administrative record.</p>	<p>Schedule and added burden.</p> <p>EPA’s cost estimate does not account for the burden of conducting the ICR in a compressed schedule at this particularly difficult time of the year.</p>
Burden / Schedule / Information Quality / Clarify	Part 2 template, EqLeaks and Pneumatics	For the “On Shore Natural Gas Transmission Category,” the EqLeaks and Pneumatics tabs cannot be completed with quality data within the defined schedule. Respondents will have 120 days to gather the information for potentially hundreds or thousands of miles of pipeline for a facility – e.g., tens or hundreds	See INGAA August 2, 2016 comments requesting that leaks and pneumatics tabs not apply to pipelines. Delete these tabs for pipeline segment or streamline request. EPA’s response to comments document ⁵ (pgs. 39,	<p>Schedule / burden.</p> <p>Information quality</p> <p>Cost (not adequately considered in EPA’s analysis).</p> <p>Clarification needed.</p>

⁵ EPA-HQ-OAR-2016-0204-0125.

Comment Topic	Location in ICR	INGAA Comment	INGAA Recommended Action	Impact
		<p>of meter stations, as many as 15-20 compressor stations, as many as 150 block valve sites and other associated equipment.</p> <p>EPA’s response to comments document³ (pgs. 39, 60) indicates the “pipeline facility” will be limited to a single state, but that is not indicated in the Part 2 form (e.g., not stated in the definition of “facility” or “onshore natural gas transmission pipeline”). If these data fields are retained, a clarification is required to limit “facility” to one state. Even if limited to a single state, this will be very difficult to complete within 120 days during winter.</p> <p>The updated definitions should rely on the GHGRP Subpart W definition – e.g., a single pipeline facility should not necessarily include all pipelines under a parent company but rather, “...for interstate pipelines, the person identified as the transmission pipeline owner or operator on the Certificate of Public Convenience and Necessity issued under 15 U.S.C. § 717f. . . .”⁴</p>	<p>60) indicates this will be addressed by limiting a pipeline facility to a single state. That is not clear from the Part 2 template (e.g., Intro form, Facility form, etc.). If these data fields are retained for pipelines, they should be limited to one state with the following clarifications in the Part 2 form:</p> <ul style="list-style-type: none"> • In the Definitions tab, EPA should revise the definition of “facility” and definition of “onshore natural gas transmission pipeline” to clearly indicate a facility is limited to a single state. • The “transmission pipeline” definition should be analogous to Subpart W (see comment field to left and § 98.238). • The Facility tab should be revised so that when “pipeline” facility is selected in row 21: <ul style="list-style-type: none"> (1) Another field (row) is added to select state. (2) “Physical address” fields in rows are 25-31 blacked out. 	
Burden / Schedule	Part 2 template, EqLeaks	Column E, Total Number of Components Monitored for Leaks During Most Recent Monitoring Survey. The term “most recent	N/A for T&S; If retained for T&S, revise the header to: Total Number of	Information Quality

³ EPA-HQ-OAR-2016-0204-0125.

⁴ See 40 C.F.R. § 98.238 definition of “Onshore natural gas transmission pipeline owner or operator.”

Comment Topic	Location in ICR	INGAA Comment	INGAA Recommended Action	Impact
		<p>monitoring survey” could be confusing and requires respondents to exercise subjective judgment and individual interpretation about what constitutes a survey. More consistent answers would be obtained if EPA clarified the question to include “using instrumentation/regulatory methods to identify. . . .” Population component counts by service/component type are not information that companies have available from their last surveys.</p>	<p>Components Monitored for Leaks During Most Recent Inspections Using Instrumentation/Regulatory Methods to Identify Leaking Equipment.</p>	
Burden / Duplicative Information	Part 2 survey	<p>The ICR should avoid duplication of information already submitted for the GHG Reporting Program (GHGRP) and from reporting associated with air permits. EPA should carefully assess available data and information to avoid duplication of effort. EPA plans to use the e-GGRT platform for data collection and should thoroughly test the software tool updates before implementation.</p>	<p>Thorough QA is needed prior to mailing ICR Part 2 survey. EPA should develop and share a plan of action to eliminate extra burden due to template / software bugs. It is not clear how EPA plans to execute data transfer and ensure quality (e.g., from GHGRP). Recipients may need to review data imported to ensure data quality, and this will add to the cost of complying with the ICR.</p>	<p>Cost and Schedule Data Quality</p>
Burden / Duplicative Information	Part 2 template, Facility	<p>Row 52: This is redundant to the “vented” information in the other tabs (emissions by source).</p>	<p>Delete.</p>	

Burden / Duplicative Information	Part 2 template, EqLeaks	DEFINITION inconsistencies, Table 2: In some cases, component counts may have been completed using Subpart W categories (e.g., “connectors” include flanges rather than separate category). If component count is available from Subpart W or State requirements, operator should be able to use that count rather than requiring another site visit to address new EPA categories.	Allow data entry label that agrees with Subpart W (or state LDAR) component categories.	Cost and Schedule
Burden / Duplicative Information	Part 2 template, Comp	Burden added from new requirement to include source test reports for compressor drivers; these would have already been submitted to State/local agency and/or EPA.	EPA should mine test reports from available avenues rather than requiring submittal of reports already provided to EPA or delegated agencies.	Cost
Confidentiality (CBI)	Part 2 template, Facility	Row 45: Frequency of visiting the facility (for the safety of the facility and workers, this information should not be publicly disclosed and should be treated as CBI).	All cost data should be CBI. Maintenance details should also be CBI. EPA should clarify which information will receive CBI protection.	Confidential
	Part 2 template, Control Device	Some of the information requested is confidential business information and its public disclosure would cause competitive harm. Cell E27 – Purchased equipment cost (\$) (CBI) Cell F27 – Total Capital installed cost (\$) (CBI) Cell G27 – Annual operating and maintenance cost (\$/yr in 2015) (CBI)		
	Part 2 template, Injection/Storage Wells	Cell C5 – frequency of visiting the well site (CBI)		
	Part 2 template, EqLeaks	Cell I66 – Measurement Cost \$		
	Part 2 template, Comp	Cell E95– asks for the total cost (equipment plus installation labor) to replace wet seals with dry seals on or after 1/1/10.		

		<p>Cell E123 asks for total cost of last rod packing replacement.</p> <p>This cost information is CBI because its disclosure could cause competitive harm.</p>		
Burden / Information Quality / Relevance	Part 2 template, Facility	<p>Rows 48, 49: For a compressor facility, these rows are duplicative. At best, the volume of gas through a transmission station is an approximation and fuel gas used at the station is 2-3% of throughput.</p>	<p>Black out responses for Transmission and eliminate data collection on negligible contributions.</p>	<p>Cost and duplication of effort</p>
Burden / Information Quality / Relevance	Part 2 template, Facility	<p>Rows 57, 58: This request for Natural Gas STAR data is too granular; data at this level of detail (facility or equipment level) is not consistent with STAR reporting and not readily available.</p>	<p>Delete.</p>	<p>Information Quality</p> <p>Burden / cost</p>
Burden / Information Quality / Relevance	Part 2 template, Facility	<p>Most existing compressors operate 8,760 hours per year. The rare exception would be those periods where a station-wide emergency shutdown occurred or the station was removed from service for a yard piping/valve project. Even during these periods, the pipeline through the station yard remains in service as the station fire gates and by-pass valves are operated. This isolates the station piping allowing gas to continue flowing. But, INGAA’s interpretation of the question may not be consistently applied, so EPA might receive ambiguous data or data with no practical utility. This is further discussed in regard to how different “operating modes” could be considered in the response.</p> <p>Row 47: The number of months the facility operated in 2015 is not pertinent to the identification of the types and prevalence of emission controls or emission reduction</p>	<p>Remove question.</p> <p>If field is retained, revise header to:</p> <p>Number of Months the Facility Was Ready For/Capable of Operation In 2015</p>	<p>Information Quality</p> <p>Burden / cost</p>

		<p>measures and potential costs for the measures and controls. Emissions can occur in “operating” mode, in “standby, <u>not</u> operating” mode, and in “shutdown, depressurized” mode. The question as stated will result in answers based on subjective judgment and the responses will not be based on consistent assumptions. For example, a compressor at a station can be on stand-by (not compressing gas) due to pipeline conditions and demand. In another scenario, other parts of the facility such as pig launcher/receiver may operate while the compressors are on stand-by, or shutdown. A review of site information on the utilization for 2015 could be complicated and require high burden to gather information.</p>		
Burden / Information Quality / Relevance	Part 2 template, Facility	<p>As discussed above, different recipient interpretations are likely and the data received will be of questionable quality and provide little or no practical utility.</p> <p>Row 47: The number of months the facility operated in 2015 is not pertinent to the identification of the types and prevalence of emission controls or emission reduction measures and potential costs for the measures and controls. Emissions can occur in different modes (see previous item in this table).</p>	Remove question.	Information Quality
Burden / Information Quality / Relevance	Part 2 template, Facility	<p>There are many modes (e.g., not operating and depressurized) and interpretations of “operated.” See previous two items.</p> <p>A review of site information on the utilization for 2015 could be complicated and require high burden to gather information.</p>	Remove question.	Cost and burden to complete

Information Quality / Relevance	Part 2 template, Control Device	Some of this information will not be available or the responses will be a guess. Therefore, EPA will obtain information of little or no value and low quality data may result in conflicting conclusions – e.g., Pilot Fuel.		Information Quality
Information Quality / Relevance	Part 2 template, Injection/Storage Wells	The Deliverability column (K) is meaningless as written. The deliverability of a <i>field</i> varies with the field pressures and stored capacity. The column should seek the deliverability at capacity or a field average for a particular year.	Eliminate or restate.	Information Quality
Information Quality / Relevance	Part 2 template, Injection/Storage Wells	Columns H through L apply to the FACILITY and not individual wells and rows.	Move to Facility Level info in Table 1 on this Tab.	Information Quality
Information Quality / Relevance	Part 2 template, Injection/Storage Wells	Row 3, 4: Driving distances range from 5 – 150 miles depending upon the well. The responses EPA receives will be an average, at best, and thus they will have no utility.	Delete	Information Quality
Information Quality / Relevance	Part 2 template, Pneumatics	Row 27: The number of controllers that were malfunctioning or excessively bleeding are not monitored or tracked. An estimate of this may be misleading (i.e., a guess).	Delete	Information Quality
Information Quality / Relevance	Part 2 template, Pneumatics	Row 28 may not be meaningful, especially with valve operators included. For example, set points can range from 10 psig on a dump valve to the line pressure on a valve operator. On average the typical set point is in the 15-30 psig range and is governed by manufacturer requirements.	Delete	Information Quality
Information Quality / Relevance	Part 2 template, Pneumatics	Row 29: For T&S, Air Supplied to controllers is the only option that makes sense; add “low bleed” devices and more than one option may apply.	More than one option may apply (e.g., Restate as a yes/no question with a list of assumed “yes” responses); “low bleed” pneumatics should be added.	Information Quality

<p>Information Quality / Relevance</p>	<p>Part 2 template, Pneumatics</p>	<p>E41: Gas Usage per Cycle based on manufacturer’s information (scf/psi)</p> <p>The scf/psi column is not a readily obtainable or meaningful metric. EPA likely meant cf/actuation. Even so, this information may not be available (e.g., older devices may not have available manufacturer information).</p> <p>The input must be an integer and there is no option to indicate the data are unavailable. Estimations (guesses) will skew the answers.</p> <p>The tendency will be to attempt to calculate the volume of gas usage (scf). However, the column clearly states manufacturer’s data. EPA should solicit data from the manufacturers.</p>	<p>EPA should contact manufacturers to ensure this is readily available information and solicit data from manufacturers.</p> <p>Change to scf/actuation and allow “unknown” as an answer.</p>	<p>Information quality</p> <p>Skewed responses will weaken the value of the information collected through the ICR and its utility in future rulemaking.</p>
<p>Information Quality / Relevance</p>	<p>Part 2 template, Pneumatics</p>	<p>F41: Based on best available data, cumulative number of actuation cycles in 2015 (or most recent operating year). This information is not available. Estimations by respondents will be subjective and inconsistent (by year); thus, the answers that EPA receives will be meaningless.</p> <p>Another reason that this data may be of limited value is that some companies fully operate the operator during annual maintenance while others partially operate the operator during this maintenance. It depends on the design of the valve facilities and the ability to bypass a valve during maintenance (i.e., one does not want to fully</p>	<p>Delete this question. The answers will be of poor quality. Insisting on an answer will increase burden while providing poor quality data.</p>	<p>Information quality and cost.</p>

		back a single line flow during maintenance activities). These answers from those who partially operate valves during annual maintenance may not be consistent.		
Information Quality / Relevance	Part 2 template, Comp	Table 4 seeks test data from the most recent test, or best available data. Many states do not require a broad spectrum of constituents for each and every test, meaning that responses of “0” may be misleading.	Delete requirement. If retained, require only a single recent test.	Information Quality Cost to gather reports / data.
Information Quality / Relevance	Part 2 template, Comp	Table 6 requests the date of last rod packing replacement. The precise date may not be available for all compressors. Estimating the date would introduce inaccuracies into the hours since the last replacement column. Also, the cost reported may not be a total cost. While respondents may have the costs for materials, many companies do not track labor on maintenance activities. Even if they do, the labor costs may not be separable from the other work occurring at the same time (e.g., a replacement of pack during a compressor overhaul will differ from a project where only the packing was replaced).	Delete these requests, or delete requests on a unit-specific basis, while allowing the respondent to identify its company maintenance practices and provide examples of its costs.	Information Quality Cost to gather data that is not readily available.
Information Quality / Relevance	Part 2 template, Comp	Table 6 does not consider integral compressors where packing may be changed at differing times for each compressor.		Information Quality
Information Quality / Relevance	Part 2 template, Comp	Table 6 – a pull down in the Frequency column (F) should be added to include Condition Based Maintenance.	Add “Condition Based Maintenance” to pull down options.	Information Quality
Burden / Information Quality	Part 2 template, Blowdown	Cell B27: Inspect/repair leaking (not fully sealed) PRD and blowdown valves. This is a “leak” question and not a “blowdown” question. In addition, inspection and repair frequency may differ from each other.	If retained, move this to the equipment leaks form. Differentiate frequency of inspection and frequency of repair.	Information Quality Clarity of request

		Volume data are difficult to determine and not available.		
Information Quality / Relevance	Part 2 template, Blowdown	Table 2. Company records are based on Subpart W definitions. The categories in Table 2 are different for pipelines. Respondents might select different categories based on their own subjective interpretations, resulting in inconsistent responses.	Use same definitions as Subpart W or clarify that pipeline blowdowns from Subpart W can be grouped for ICR.	Information quality and cost
Information Quality / Relevance	Part 2 template, Blowdown	Table 2. A transmission system will have numerous blowdown events along the pipeline and at GHGRP non-reporting stations where this data is marginal at best. (E.g., we do not know how many times a scrubber dumped in a station or out at a field location).	Delete for Transmission	Information Quality
Information Quality / Relevance	Part 2 template, Blowdown	Table 2 Columns F & H - The <50 cf columns require a value. Records may not exist for sources <50 cf but 0 is not the correct value.	Delete for Transmission	Information Quality
Information Quality / Relevance	Part 2 template, Blowdown	Table 3. It may be difficult or impossible to locate all required records to determine the number of events and volume of gas saved for all hot taps in the year. A recipient <i>may</i> come close when estimating the number of hot taps but each project file would need to be evaluated to determine the availability of pipeline pressures during the tap. Gas savings would occur only from that reduced pressure, which is typically specific to each project and not always logged.	Delete question based on complexity of determining pipeline pressures during the tap for the year 2015. EPA's ICR cost estimate does not account for this type of data mining. The submission of estimates would compromise the integrity of the data.	Information Quality Cost and schedule (burden to complete)
Information Quality / Relevance	Part 2 template, Tanks	EPA states in the response to comments document: "...we are requesting that selected facilities use the latest version of the CARB method, but use the volumetric flow rate from the December 2010 version that	Allow other standard methods (see INGAA's August 2, 2016 comments).	Information Quality

		requires a 60 mL/min sampling rate as opposed to later versions that require a 120-180 mL/min rate.” However, EPA acknowledged that concerns about using CARB have been raised but said that EPA requires, “a consistent set of procedures for sampling and analysis.” The vast discontent with the CARB method is problematic to the integrity of the ICR. Additionally, EPA and others have widely distributed various draft versions of the method which is creating confusion with operators and laboratories who are attempting to understand the obligations that might arise with this sampling request.		
Clarify	Part 2 template, Facility	Row 46: Type of electricity – should “solar” be selected for a small array meant to power a meter? The question as stated is vague and its relevance is unclear. There are different levels of service of electricity. The availability depends upon the utility supplier. The presence of electricity does NOT mean that there is adequate electricity to support additional capacity.	Delete. If field is retained, the question should be reframed as “Does the facility use commercial electricity?” The answer will be YES for nearly all T&S compressor stations, but the answer will not provide any insight into the Part 2 ICR goals.	Information Quality
Clarify	Part 2 template, Injection/Storage Wells	Row 11, 12, 13: the term Combustion Device is not included on the Definitions Tab	Clarify definition of “Combustion Device”	Information Quality
Clarify	Part 2 template, Injection/Storage Wells	Row 11: Is this a combustion device for “control?”	Clarify that this refers to a storage <i>well site</i> and NOT the broader facility.	Information Quality
Clarify	Part 2 template, Dehys	Depending on the season, the responses provided will vary, but the table seeks one value. EPA needs to clarify in what operating condition this data is requested.	Clarify operating conditions.	Information Quality
Clarify	Part 2 template,	The table instructions do not specify a	Include minimum diameter for	Information Quality

	EqLeaks	minimum size to be included. The GHGRP has a 0.5” minimum. The component count on a meter run more than doubles if one starts to include small diameter instrument lines. In the station, the process becomes more complicated as one cannot easily determine a gas versus air line when looking at small diameter tubing.	component counts. INGAA recommends 1 inch. Alternatively, 0.5” for consistency with Subpart W.	Burden (counting small diameter components may add significantly to time required to complete count – e.g., differentiate air vs natural gas lines).
Clarify	Part 2 template, AGRU	Amine units are located at many storage fields. The AGRU definition indicates that the ICR is specific to acid gas removal (or sweetening) units. While this may be an appropriate descriptor for a sour gas field, another use is to assure that tariff qualities are met after coming out of storage. The storage field may not be considered “sour.” AGRU tab should not apply to storage fields.	Clarify definition; AGRU tab should not apply to storage fields	Information Quality
Clarify	Part 2 template, Comp	Cell C4 – “other” than what? Other than reciprocating? Or other than reciprocating and centrifugal?	Clarify. Switching the order of row 4 and row 5 may add clarity.	Information Quality
Clarify	Part 2 template, Comp	Cell E123 asks for “total,” the question potentially lacks clarity – parts only? Parts plus installation labor? Something else?	Clarify so that responses are consistent.	Information Quality
Clarify	Part 2 template, EqLeaks	TABLE 3 should only apply to upstream. These equipment counts are used for upstream estimates (e.g., for Subpart W based on equipment level leak emission factors). The original (May) version of Part 2 survey, Table 3 included, “For Onshore petroleum and natural gas production facility only. . . .” EPA did not retain that qualification in the updated (September) version. If EPA is requesting some information from midstream, which uses	Return header title to original “For Onshore petroleum and natural gas production facility only. . . .” It is not appropriate to apply Table 3 to segments other than upstream segments where <i>equipment</i> count information is gathered as activity data for Subpart W emission estimates.	Quality of Information Cost for interpreting and applying nomenclature not used for T&S leaks.

		equipment counts for some emission estimates in Subpart W, that should be clarified. This should NOT apply to processing, T&S, etc., because those equipment groupings are not used for Subpart W estimates.		
Clarify	Part 2 template, Blowdown (Reporting year)	Table 3. Assume this is for 2015. Unless clarified, various respondents may assume differently.	Clarify. Throughout the ICR, respondents will assume data from 2015 should be provided unless specifically stated otherwise.	Quality of Information
Clarify	Part 2 template, Blowdown	<p>Row 27 is out of place and should possibly be on the Leaks tab. The frequency of inspection would vary depending on the type of unit.</p> <p>However, the repair of the leaking component cannot be quantified unless it is measured. Any savings from the leak must be offset by the amount of gas released to affect the repair. In many cases, the facility will need to be blown down to make the repair to either a PRV or valve.</p> <p>Leak rates are generally not quantified prior to repair.</p>	Restate the question and move to leaks tab.	Quality of Information
Clarify	Part 2 template, Blowdown	B18: Clarify time frame – 2015? The phrase “need for some blowdown events” implies EPA is only asking about reducing the <u>number</u> of events – but other questions imply EPA also wants information on methods used to reduce emissions. The question could be more accurately stated: “Did the facility use any practices that reduced the number of or emissions from blowdowns in 2015?”	Restate the question so that the answer directly addresses the information of interest: “Did the facility use any practices that reduced the number of or emissions from blowdowns in 2015?”	Quality of Information

Clarify	Part 2 template, Tanks	Tanks counts can be reported for either <10 bbl/day or \geq 10 bbl/day. However, details can only be reported for tanks \geq 10 bbl/day. The details for <10 bbl/day are not available and not possible or practical to complete. The information and emissions are simply not available.	Clarify that details in Tanks Separators form Tables 2 and 3 are not required for <10 bbl/day units.	Quality of Information; Cost and timing to pursue details that will not be available.
Clarify / Typo	Part 2 template, Tanks And Intro	The Intro Tab specifies a threshold of “5 bbl/day for the parent company to collect one representative pressurized feed sample for flash analysis for any of its facilities.” The tanks tab, and two docket documents (summary memo on comments and responses ⁶ ; detailed tabulation of comments and responses ⁷) all indicate that the threshold is 10 bbl/day.	Clarify on the Intro tab that the threshold is 10 bbl/day.	
Typo / Layout	Part 2 template, Facility	Cell B55 – typo (“transmission”) Cell J6 – typo (“cumulative”)	Correct spelling	
Typo / Layout	Part 2 template, Pneumatics	Row 45 – Restate to, “are the facility controllers. . . .”	Change “pneumatic” to “facility”	
Typo / Layout	Part 2 template, Intro	The “instructional material” should be in the same order as the tabs in the spreadsheet.	Reorder	
Typo / Layout	Part 2 template, pull down menus throughout	Pull-down menus are not wide enough to accommodate text for menu options. Difficult or impossible to read, which requires additional time for respondent to understand fields. Every extra action (click, review, clarification) expends resources. Example: EqLeaks C15, Blowdown E8 (and other examples throughout).	EPA should “repair” menus so all text can be viewed for each option in all pull down menus.	Affects clarity and time to complete the forms.
Typo / Layout	Part 2 template, Blowdown	Row 25 – replace “of” with “or.”	Row 25 – replace “of” with “or”	

⁶ EPA-HQ-OAR-2016-0204-0124.

⁷ EPA-HQ-OAR-2016-0204-0125.

Typo / Layout	Part 2 template, Tanks	Table 5, row 170: L and Q are same field.	Eliminate L or Q.	Duplication
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