Interstate Natural Gas Association of America

February 24, 2015

Via www.regulations.gov and email

U.S. Environmental Protection Agency
EPA Docket Center
Mailcode 28221T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-OAR-2014-0831 – Comments Regarding the Proposed Rule, "Greenhouse Gas Reporting Rule: 2015 Revisions and Confidentiality Determinations for Petroleum and Natural gas Systems," dated December 9, 2014 (79 FR 73148)

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) "Greenhouse Gas Reporting Rule: 2015 Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems" proposed rule. INGAA's 24 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. Many transmission and storage facilities are subject to the EPA's Greenhouse Gas Reporting Program (GHGRP) and are required to report under Subpart C, (General Stationary Fuel Combustion Sources), Subpart W (Petroleum and Natural Gas Systems), and Subpart A (General Provisions).

INGAA understands the EPA's desire to expand the reporting program to include transmission pipeline blowdowns. However, INGAA urges the EPA to consider the underlying drivers of blowdowns as part of a comprehensive approach to reducing methane emissions. The recommendations in these comments do not minimize or weaken the EPA's goals to reduce methane. INGAA also recommends that the EPA make several substantive and clarifying amendments, as explained in INGAA's detailed comments.

INGAA appreciates your consideration of these comments. We also thank you for the additional comment period and for holding the public hearing. Please contact me at 202-216-5955 or tpugh@ingaa.org if you have any questions.

Thank you.

Sincerely,

Theresa Pugh
Vice President, Environment, Health and Construction

cc: Paul Gunning, U.S. EPA (via email)
Anhar Karimjee, U.S. EPA (via email)
Mark DeFiguerido, U.S. EPA (via email)
Alexis McKittrick, U.S. EPA (via email)
Jim Laity, OMB Branch Chief (via e-mail)
Cortney Higgins, OMB Desk Officer (via e-mail)
Jeff Wiese, PHMSA (via email)

COMMENTS ON THE PROPOSED AMENDMENTS TO SUBPART W OF THE GREENHOUSE GAS MANDATORY REPORTING RULE

Proposed Amendments to Code of Federal Regulations Title 40, Part 98, Subpart W

79 Federal Register 73148, December 9, 2014

February 24, 2015

The Interstate Natural Gas Association of America (INGAA) respectfully submits these comments in response to the "Greenhouse Gas Reporting Rule: 2015 Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems" proposal (Proposed Rule).

Executive Summary

INGAA understands the need to collect blowdown data under Subpart W, but has concerns with the proposed requirements for tracking and reporting blowdowns. INGAA urges the EPA to consider several issues, including the following, before finalizing the rule:

- EPA should work with the Pipeline and Hazardous Materials Safety Administration (PHMSA) to consider the drivers for blowdown emissions and pinpoint areas where new policy, processes and technology could help reduce emissions.
- EPA should distinguish between its definitions for a transmission pipeline source category used in the Proposed Rule and its definitions for transmission compressor and underground storage sources that are already included in the Subpart W regulations.
- EPA should clearly define the applicability of the rule to intrastate pipelines.
- EPA should develop pipeline blowdown categories rather than relying on the existing event categories used for compressor stations.
- EPA should consider whether certain information such as latitude and longitude for each location is justified.
- EPA should consider additional exclusions for transmission pipeline blowdowns.
- EPA should consider extending Best Available Monitoring Methods (BAMM) without the need for pre-approval for the entire 2016 reporting year; and
- Finally, the EPA should provide several clarifications to avoid confusion in implementing the rule.

Explanation of blowdowns in natural gas transmission pipeline sector:

- A blowdown is the planned release of natural gas from the pipeline at a designated location to the atmosphere in order to conduct maintenance or prevent an unplanned release that endangers humans or causes property damage.
- Pipeline segment blowdowns are required to perform maintenance, assessments, and pipe replacements and for safe pipeline operations.
- PHMSA requires pipeline blowdowns as part of class location pipe replacement (that is, population increases in the vicinity of the pipeline above specified thresholds) and for hydrostatic testing (which is when an operator tests the pipe using water under high pressures).
- Pipeline blowdowns can also be required for other pipeline safety purposes such as repairing damage to pipe due to excavation or other outside force damage.
- In some cases, but not all, the required pipeline segment blowdowns can be minimized if alternative technologies such as in-line inspection technologies exist and are allowed under the regulation to validate the pipe integrity.

- Blowdowns are necessary for the safe addition, extension and retirement of natural gas transmission pipeline facilities.

Detailed Comments

1. EPA and PHMSA should work together to identify the drivers for blowdown emissions prior to finalizing this rule.

INGAA recommends the EPA use blowdown event categories (see Comment 5) that will assist the EPA, the PHMSA, pipeline operators and others identify the cause of blowdown emissions. This will contribute to identifying the most cost effective opportunities for reducing methane emissions from the pipeline sector. It also will facilitate identifying opportunities for reducing blowdown emissions through choices made in how to achieve pipeline safety goals. INGAA notes that choices made by PHMSA with regard to the policies, processes and technologies utilized to achieve pipeline safety goals can result in increased or decreased methane emissions.

As EPA is aware, the 2014 GHG National Inventory[1], which displays methane emissions from natural gas transmission pipelines as well as compressor stations, indicates that pipeline blowdown emissions comprise about 9% of the total methane emissions from the natural gas transmission and storage sector. However, this estimate is based upon an emission factor developed by the EPA/Gas Research Institute (GRI) study[2] conducted 20 years ago. The EPA/GRI study relied on limited data to develop the blowdown emission factor, and there are questions about whether the emission factor accurately represents current operations and activities related to pipeline blowdowns.

In order to present a complete picture of the total methane emissions from the natural gas transmission sector and inform the cost-benefit analysis of reducing those emissions, the EPA should consider the current and future regulatory drivers for various emissions categories, including pipeline segment blowdowns. The blowdown of a pipeline segment is essential for certain pipeline maintenance, testing, and replacement activities. Pipeline operators must have the flexibility to blowdown pipeline segments to meet regulatory requirements, to conduct pipeline maintenance and repairs, and to maintain safe operations of this critical national infrastructure. For example, pipeline operators are required by the PHMSA to blowdown pipe segments as part of the replacement process for a class location change, hydrostatic testing requirements (i.e., testing the strength of a pipeline by filling it with water under pressure as part of integrity assessments), and to assure pipeline integrity and safety.

The number of required blowdowns may increase as the PHMSA publishes new pipeline safety regulations in response to Congressional mandates. However, methods such as improved inline inspection technologies are available to help pipeline operators validate the safety of their facilities without requiring an operator to blowdown a pipe segment. Although INGAA acknowledges that it is not within the EPA's jurisdiction to determine when a pipeline blowdown

[1] The U.S. EPA publishes an updated annual GHG inventory every April that includes a time series of GHG emissions from 1990. The April 2014 report added the 2012 inventory, "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 – 2012." See http://www.epa.gov/climatechange/ghgemissions/usinventoryreport.html

[2] "*Methane Emissions from the Natural Gas Industry"* EPA/GRI Reports, April 1996.

is necessary, the Administration as a whole should consider policies, processes, and technologies that can minimize the need for blowdowns as part of its larger strategy for reducing methane emissions. Reducing unnecessary pipeline blowdowns by using equivalent or superior assessment and repair technologies presents an excellent opportunity to reduce methane emissions.

2. EPA should distinguish between its definition for the "transmission pipeline" source category included in the Proposed Rule and the existing definitions for "transmission compressor station" and "underground storage facility" source categories.

In the Proposed Rule, the EPA adds natural gas transmission pipelines as a new source category in 40 C.F.R. § 98.230(a)(10). The EPA also adds related definitions in § 98.238. The agency already has definitions in the existing rule for transmission compressor station and underground storage facilities. While it appears that the EPA intends to create clear lines of demarcation for the three source categories, the EPA should include additional details in the proposed definitions to avoid confusion. In addition, the EPA should allow operators to report pipeline blowdowns that occur within the boundary of a compressor station as part of the pipeline segment.

Facility definition

Subpart W "transmission pipeline" sources are interspersed with compressor stations and storage facilities along an interstate natural gas transmission pipeline. This characteristic is unique to the Subpart W source categories. For example, a pipeline "facility" stops at the inlet to a compressor station and re-starts at the outlet of the facility. To improve clarity, INGAA recommends a revision to the proposed definition of "facility" for the natural gas transmission pipeline segments, as follows:

> Facility with respect to the onshore natural gas transmission pipeline segment means the total U.S. mileage of natural gas transmission pipelines, as defined in this section, owned and operated by an onshore natural gas transmission pipeline owner or operator as defined in this section. **This facility excludes the following related natural gas transmission and storage sector operations in other Subpart W source categories: the onshore natural gas transmission compression source category identified in §98.230(a)(4), the underground natural gas storage source category identified in §98.230(a)(5), and the LNG storage segment identified in §98.230(a)(6).**

Pipeline blowdown reporting for transmission compression segment and transmission pipeline segment

INGAA recommends that the EPA retain the reporting approach currently applicable to transmission compressor stations but add clarifying amendments to the reporting obligations for transmission pipeline blowdowns. For transmission compressor stations, blowdown event categories are identified in § 98.233(i)(2) and include "pipeline venting" for lines outside the compressor station if the venting occurs within the facility boundary. In Comment 5, INGAA recommends revisions to the event categories for reporting blowdown emissions for the

transmission pipeline segment. In Comment 12, INGAA recommends clarification of the terminology referenced in § 98.233(i)(2) covering pipeline blowdowns that occur within compressor stations.

Regarding sections in Subpart W that address categorizing of blowdowns as "compressor station" or "pipeline" emissions, revisions are needed in § 98.233(i) for emissions estimation and in § 98.236(i) for associated reporting.

To categorize blowdown emissions originating from the pipeline with the "transmission pipeline segment" rather than the "transmission compression" segment, the Proposed Rule revisions include language to address:

- In section §98.233(i)(2), the list of categories for reporting blowdowns should eliminate "pipeline venting" from the types of events that apply to transmission compressor stations. Comment 5 provides additional INGAA recommendations on the event categories that should be used for tracking pipeline segment blowdowns.
- Similar conforming revisions may be required to clearly indicate reporting obligations that apply for compressor stations in §98.236(i)(1) and for transmission pipelines in (i)(3).

Further, INGAA believes that this facility definition might need to be adjusted under the existing Subpart W regulation in Sections 98.236(i) and 98.236(i)(3) for clarity.

3. INGAA believes that the EPA should clarify its distinction of which intrastate pipelines are affected by the Proposed Rule.

The EPA proposes that its rule apply only to intrastate pipelines that are identified in connection with Section 311 of the Natural Gas Policy Act of 1978 (NGPA). However, the Federal Energy Regulatory Commission (FERC) regulates these particular pipelines on a limited basis because such pipelines have a statutory exemption to engage in interstate transactions (transportation or storage) without the entity being subject to the full scope of regulation pursuant to the Natural Gas Act. 15 U.S.C. §§717-717w. Consequently, intrastate pipelines that perform NGPA Section 311 transportation do not represent the full universe of intrastate natural gas transmission pipelines. Therefore, INGAA asks EPA to clarify why the agency decided to limit its reporting requirements only to the Section 311 intrastate pipelines rather than all intrastate pipelines.

4. INGAA supports reporting pipeline blowdown emissions by operating company.

In the definition section of the Proposed Rule, the EPA defines a "facility" for an onshore natural gas transmission pipeline segment as "the total U.S. mileage of natural gas transmission pipelines….owned and operated by an onshore natural gas transmission pipeline owner and operator…"[3] The EPA further defines "onshore natural gas transmission pipeline owner and

[3] *See* 79 Fed. Reg. 73148 at 73188.

operator" for interstate pipelines as "the person identified as the transmission pipeline owner or operator on the Certificate of Public Convenience and Necessity issued under 15 U.S.C. 717(f)…[4]

For pipeline companies that operate under a parent company, the certificate may identify the operating company as the owner or operator. INGAA supports the reporting structure based on the proposed definitions. With this structure, each operating company under a common parent would submit a separate Subpart W report for transmission pipeline blowdowns. INGAA believes that the EPA should retain this structure in the Final Rule.

INGAA points out that the EPA's preamble may cause confusion. In the preamble, the EPA states, "[i]f an entity owned and operated multiple pipelines in the U.S., the facility would be considered the aggregate of those pipelines, even if they are not interconnected."[5] This statement could be interpreted as requiring operators to submit one consolidated figure for the corporate parent company. INGAA does not support this aggregated approach. **The Final Rule should retain the structure that is in the Proposed Rule text, in which the reporting entity for a pipeline facility is the operating company listed on the FERC certificate.** This approach is consistent with the method that interstate pipeline operators use to report greenhouse gas emissions from compressor stations. That is, compressor station emissions are reported by the specific operating company-- not the corporate parent company.

5. The EPA should develop *pipeline* blowdown categories, rather than relying on the seven event categories listed in § 98.233(i) that were developed for *compressor station* blowdowns.

When the EPA added blowdown reporting for transmission pipelines in the Proposed Rule, it did not revise the estimation methods to reflect the activities that result in blowdowns along a pipeline. Consequently, the Proposed Rule would apply the methods developed for tracking compressor station blowdowns. The EPA should develop a separate list of categories for tracking and reporting pipeline blowdowns, because the activities that result in blowdowns along a pipeline differ from those that occur at compressor stations**.** The value of the data generated from pipeline blowdown reporting would significantly improve if the reporting categories correspond to the activities that occur along a pipeline.

INGAA recommends the following list of event causes to help identify the drivers of emissions:

1. Pipeline integrity work
    - the preparation work of modifying facilities
    - ongoing assessments
    - maintenance or mitigation
2. Traditional operations or pipeline maintenance
3. Equipment replacement or repair (*e.g.*, valves)
4. Pipe abandonment
5. New construction or modification of pipelines including commissioning and change of service

[4] *Id.*
[5] *Id.* at 73156.

6. Pipeline incident (as defined by PHMSA) management and repair
7. Operational precaution during activities (*e.g.*, excavation near pipelines)
8. Other.

Recent amendments to the regulation for compressor station blowdown reporting were designed to improve the value of data collected. Similarly, tracking pipeline blowdowns by these categories would provide more valuable information than relying on the categories in the current rule. INGAA recommends revising § 98.233(i)(2) to include these categories for pipeline blowdowns, and retaining the existing categories for compressor station blowdowns. The associated reporting requirements, discussed further in Comment 7, would include annual blowdown volumes by category as well as the number of annual events.

6. EPA should consider certain exclusions for transmission pipeline blowdowns.

INGAA believes that the EPA should consider a de minimis exclusion for transmission pipeline blowdowns. Section 98.233(i) includes exclusions and de minimis thresholds for reporting blowdowns. Those criteria, however, were developed for other source categories such as compressor stations. It does not appear that the EPA considered pipeline blowdown characteristics or the relevance and applicability of the existing criteria in the Proposed Rule.

See Comment 9 for an explanation of the cost savings that would result if the final rule adopts INGAA's de minimis language.

Blowdowns from large diameter high-pressure pipe should be the focus of the "transmission pipeline" source category. Smaller ancillary equipment located along pipelines should be excluded. Section 98.233(i) exempts blowdowns from equipment with a *physical* volume less than 50 ft^3. For transmission pipeline blowdowns, equipment with marginally higher volume may be blown down, but tracking those emissions may not be warranted because the emissions are trivial when compared to more substantive events. For example, the physical volume of a metering run blown down for maintenance could exceed 50 ft^3, but those emissions would not be a significant contributor to total annual pipeline blowdowns. INGAA believes that the 50 ft^3 reporting threshold for transmission pipeline blowdowns is not adequate. This threshold would likely cover filter/separators at meter stations, pipeline heaters, meter station heaters, regulator and control valve runs, and crossover headers but miss other ancillary facilities that exceed that physical limitation.

Pipeline operators use numerous ancillary facilities along their interstate pipelines. Ancillary facilities include metering and/or regulating stations, pipeline interconnects, and pig launchers and receivers, etc. The size of these ancillary facilities varies greatly. For example, metering facilities are sized based on the number of interconnects (single or multiple pipeline connections) and the volumes of gas being received or delivered. Therefore, it is not feasible to establish a *specific* de minimis volume threshold. However, emissions from maintenance activities at any of these individual ancillary facilities would be considerably less than the 25,000 ton CO_2e threshold established for compressor stations.

INGAA recommends exclusions for ancillary equipment to reduce the reporting burden. This recommended exclusion does no harm to the purpose of the rule since the rulemaking focuses on mainline pipeline blowdowns. This is similar to current exclusions in § 98.233(i) for blowdowns for over-pressure relief, operating pressure control, desiccant dehydrators, etc. For transmission pipelines, INGAA recommends excluding blowdown reporting for ancillary pipeline equipment including metering and/or regulating stations, pipeline interconnects, valve assemblies or valve body cavities, and pig launchers and receivers. If a blowdown of a transmission *pipeline* section occurred at one of these ancillary facilities, the blowdown volume and purpose would still be reported under the operating company's pipeline blowdown totals in accordance with Section 98.232(m).

7. INGAA opposes EPA's proposal to require pipelines to report the data listed in section 98.236(aa)(11) since the data is irrelevant to identifying pipeline blowdowns.

In Section 98.236(aa)(11), EPA proposes that pipelines report the following data:

For onshore natural gas transmission pipeline facilities, report the quantities specified in paragraphs (aa)(11)(i) through (aa)(11)(vi) of this Section.

> (i) The quantity of natural gas received at all custody transfer stations in the calendar year, in thousand standard cubic feet. This value may include meter corrections, but only for the calendar year covered by the annual report.
> (ii) The quantity of natural gas withdrawn from in-system storage in the calendar year, in thousand standard cubic feet.
> (iii) The quantity of natural gas added to in-system storage in the calendar year, in thousand standard cubic feet.
> (iv) The quantity of natural gas transferred to third parties such as LDCs or other transmission pipelines, in thousand standard cubic feet.
> (v) The quantity of natural gas consumed by the transmission pipeline facility for operational purposes, in thousand standard cubic feet.
> (vi) The miles of transmission pipeline in the facility.[6]

While INGAA's members are committed to addressing the data gap for pipeline blowdowns, the reporting requirements must provide valuable information. INGAA asserts that the data requests listed in § 98.236(aa)(11) are irrelevant to determining pipeline blowdown volumes. A data user cannot calculate pipeline blowdown volumes by comparing pipeline injections versus withdrawals.

Nonetheless, pipelines already report publicly the proposed Section 98.236(aa)(11) data in Form EIA-176 and/or FERC Form 2 (albeit in dekatherms and not Mcf). Interstate pipelines also report the number of transmission pipeline miles to both PHMSA as part of that agency's annual reports (PHMSA Form 7100-2) and FERC (as part of FERC Form 2). Requiring pipelines to

[6] 40 C.F.R. § 98.236(aa)(11).

report this information to EPA would be duplicative and therefore the proposal should be eliminated.

Moreover, the Paperwork Reduction Act (PRA) is intended to reduce the information burden imposed by the federal government.[7] The stated purpose of the PRA is "to have Federal agencies become more responsible and publicly accountable for reducing the burden of Federal paperwork on the public…"[8]

As the EPA is aware, in order to obtain Office of Management and Budget (OMB) approval of an information collection, an agency must demonstrate that it has "taken every reasonable step" to ensure that the proposed collection:

> (i) is the least burdensome necessary for the proper performance of the agency's functions to comply with the legal requirements and achieve program objectives;
> (ii) is not duplicative of information otherwise accessible to the agency; and
> (iii) has a practical utility.[9]

Therefore, INGAA requests that EPA eliminate the proposed Section 98.236(aa)(11) reporting requirement since the data is duplicative and lacks a practical utility.

8. INGAA requests that EPA eliminate its proposal to require pipelines to report longitude and latitude data of each location where a blowdown has occurred since the data is burdensome and will not produce air quality benefits.

INGAA argues that EPA's request to collect the longitude and latitude data of each location where a blowdown has occurred is burdensome without producing data that has a "practical utility." [10] This data is not currently collected for each location along the pipeline. The EPA has not demonstrated how this additional location data will produce valuable information on the transmission sector's greenhouse gas inventory levels. The need for such localized data is unclear because greenhouse gas emissions and methane emissions are a global issue. Interstate pipelines have not geospatially located all potential blowdown locations along the pipeline system and would need to survey and develop databases of these locations.

This regulatory reporting burden is compounded by the compilation of the annual volumes released per pipeline blowdown category for each location where a blowdowns occurs.

9. The EPA has not justified the burden associated with the proposed information collection.

[7] *See* 44 U.S.C. § 3501 (1995).
[8] *Id.*
[9] 5 C.F.R. § 1320.5(d) (2013).
[10] *Id.*

The Proposed Rule and supporting documents do not adequately consider perceived benefits or costs. In Appendix B of its Supporting Statement, EPA estimates that there are 150 reporters for Onshore Natural Gas Transmission Pipeline facilities.[11] However, INGAA asserts that there are actually 183 reporters representing approximately 234,156 miles (out of a total of 302,813 of transmission miles regulated by PHMSA). INGAA bases this figure upon an informal INGAA member company survey of the number of operators that are required to complete a PHMSA annual report (PHMSA F-7100-2) or are regulated by FERC under Section 311 of the NGPA.

The EPA also estimates that there are only 72 occurrences per respondent per year. In contrast, INGAA (using its informal survey) asserts that there are approximately 57,700 blowdowns per year (including those from de minimis facilities).[12] This figure is based on 183 reporters using the EPA definition of facility. If the de minimis facilities are excluded, as proposed by INGAA, there will be approximately 3100 blowdowns for the 183 reporters. **INGAA contends that the annual cost estimate for recording the blowdown information for the 183 reporters is $888,580 per year (including the de minimis facilities) and $47,900 per year if the de minimis facilities are not included.**

Complying with the proposed rule will be a two-step process. Company personnel must travel to the site to conduct each blowdown event and then record the additional information to track pipeline blowdowns. The EPA makes reference in its supporting statement that natural gas transmission pipeline reporters would perform engineering calculations based on pressure, temperature, and volume of the pipeline segment rather than traveling to the site. This is an incorrect assumption for pipeline blowdowns. This information collection will be a new requirement for the companies and that cost was not adequately estimated by the EPA.

Although company personnel are already physically on site to conduct each blowdown event the reporting will require a new responsibility. Personnel would make the calculation onsite and when the blowdown occurs. Eventually company personnel would also need to summarize this information annually for each blowdown location site. Not only should the EPA factor in the additional costs for company personnel to record the blowdown information, but the EPA should also consider the work needed on an annual basis to summarize and submit the data to the agency.

In addition, EPA has not considered the costs or the time needed to develop and implement a recordkeeping system to gather the latitude and longitude information for each blowdown at each individual location. INGAA members have approximately 200,000 miles of pipelines. Using INGAA's informal survey INGAA believes that a single pipeline system of a few thousand miles could have at least 1,300 locations (including de minimis) where blowdowns could occur or, by extrapolation, at least 70,716 separate locations for 183 reporters. Pipeline transmission operators will need to survey their pipelines to determine longitude and latitude for *each* potential blowdown location. The upfront one-time cost to conduct this work is approximately $100 per location. These costs amount to approximately $7.1 million (including de minimis facilities). If the de minimis facilities are excluded as proposed by INGAA, these

[11] *See* Appendix B, Supporting Statement, EPA-HQ-OAR-2014-0831.
[12] *See* INGAA Comment 6 for an explanation of de minimis facilities.

costs would amount to approximately $4.3 million for the 183 reporters. These cost estimates far exceed the EPA estimates for the interstate pipeline segment.

10. INGAA believes that the EPA should allow operators to use BAMM for the entire 2016-reporting year without the need for pre-approval to accommodate the necessary changes in recordkeeping systems.

The EPA proposes to allow operators to use BAMM without pre-approval for the first three months of 2016. If additional time is needed, a BAMM use request must be submitted to the EPA by January 31, 2016. Operators will need time to develop systems to implement the new Subpart W requirements. For example, a new tracking system would be needed if detailed event location information were required for each pipeline blowdown event. INGAA recommends allowing BAMM without the need for pre-approval for the entire 2016 reporting year to provide operators adequate time to implement new requirements. This one-year waiver would also reduce the costs of compliance with the proposed regulation.

If EPA does not agree with INGAA's recommendation and BAMM is only allowed for three months, many operators will likely submit BAMM requests by the January 31 deadline. Consequently, if the EPA takes this course, the Proposed Rule should be revised to identify the EPA's plan for reviewing and acting on BAMM requests. The EPA should be obligated to respond to BAMM requests well in advance of the March 31, 2016 expiration date.

11. INGAA supports the use of advanced monitoring technologies and methods, but it questions whether this rulemaking is the appropriate venue to raise this issue.

In the preamble to the Proposed Rule, the agency solicits comment on the use of advanced monitoring technologies and methods for estimating emissions.[13] A discussion paper in the docket provides additional background. INGAA supports allowing access to technology advances and improved methods for estimating emissions. However, this rulemaking only addresses a subset of GHGRP sources and sectors, petroleum and natural gas systems under Part 98, Subpart W. The use of advanced monitoring and methods would be applicable across the various sectors subject to the GHGRP, so raising this issue in a Subpart W rulemaking may not be appropriate. INGAA recommends soliciting comment on advanced monitoring and methods in a separate action that applies to all sectors subject to Part 98.

Notwithstanding this concern, INGAA offers some initial feedback. The EPA should allow advanced monitoring and methods at the operator's discretion as a replacement for current Subpart W requirements. INGAA is opposed to adding new, incremental requirements to Subpart W. Instead, the EPA should consider a review and approval process for advanced monitoring methods and technologies, and new technologies should be adequately demonstrated and verified. The discussion paper included in the docket explores some options, such as approaches for alternative monitoring approval in the General Provisions of Part 60 and Part 63. While a review and approval process for alternative monitoring technologies or methods analogous to those procedures would be appropriate, INGAA encourages a streamlined process

[13] *See* 79 Fed. Reg. 73148 at 73158.

to facilitate implementation and minimize the burden of case-specific reviews. INGAA will likely offer additional comments if the EPA solicits feedback in a future GHGRP proposal.

12. Finally, INGAA requests clarification on several issues.

The EPA should clarify the name of the emissions source for blowdown events

Subpart W refers to "blowdown vent stack" emissions. Depending on the type of event, blowdown emissions may not be released to the atmosphere via a stack. In comparison, the definition of "blowdown" and "blowdown vent stack" in the general definitions section of Subpart A[14] implies that blowdown emissions other than those emitted through a stack are included. Thus, this emission source should be called "blowdowns" or "blowdown venting."

INGAA recommends revising the name of this emissions source, which would require revising the title to § 98.233(i) and references to this emissions source in § 98.232.

The EPA should revise or clarify the use of the term "distribution pipelines," in § 98.233(i) (2).

In the November 2014 Final Rule revising Subpart W,[15] the EPA added a reference to "distribution" pipelines in the emissions estimation method section for blowdowns.[16]

The description of blowdown event types in §98.233(i)(2) includes the following:

> Equipment or event types must be grouped into the following seven categories: facility piping (i.e., piping within the facility boundary other than physical volumes associated with *distribution pipelines)*, pipeline venting (i.e., physical volumes associated with *distribution pipelines* vented within the facility boundary)… [Emphasis added]

The EPA should allow the reporting of pipeline blowdown emissions released within the boundary of a compressor station to be included as part of the pipeline segment.

This reference was not included or explained in the proposed rule issued in March 2014. This new terminology is unclear and should be revised or clarified. A compressor station is usually associated with "transmission" pipelines, so reference to "distribution" pipelines is confusing. In addition, the distribution sector is a separate industry sector, and the "natural gas distribution" source category in Subpart W has different reporting requirements than the transmission sector. INGAA recommends deleting the parenthetical text from § 98.233(i)(2). If not, the EPA should explain its intent.

INGAA supports the EPA's approach to pipeline leak reporting.

[14] 40 C.F.R. § 98.6 (2015).
[15] "Greenhouse Gas Reporting Rule: 2014 Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems," 79 Fed. Reg. 70352 (November 25, 2014).
[16] 40 C.F.R. § 98.233(i).

Finally, INGAA supports the EPA's decision to exclude pipeline leak reporting. In the preamble,[17] the EPA stated that it is not proposing to add pipeline leaks because PHMSA already requires reporting of leaks. **INGAA agrees with this rationale and supports the EPA's decision.**

[17] *See* 79 Fed. Reg. 73148 at 73157.

Conclusion

- INGAA supports including pipeline blowdowns in Subpart W.
- INGAA supports the EPA's decision to exclude pipeline leak reporting**.**
- INGAA believes that the EPA's proposed rulemaking can be improved by categorizing more precisely the causes of methane emissions from pipeline blowdownss.
- INGAA urges the EPA to improve the effectiveness of the reporting program by developing specific blowdown categories for transmission pipelines rather than using the event categories for compressor stations, as it has proposed.
- INGAA supports the use of a de minimis exclusion, which will significantly reduce the costs of the implementing this rule.
- EPA should review its proposal to ensure that its information collection complies with the PRA.
- The pipeline industry supports advanced monitoring technologies as they are adequately and commercially demonstrated, but questions whether that topic is appropriate in this rulemaking and;
- INGAA urges the EPA to allow operators to continue to use BAMM without any pre-approval requirement for the complete 2016 reporting year.