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EPA Docket Center
EPA West Building Room 3334
1301 Constitution Avenue, N.W.
Washington, D.C. 20004

Attention Docket Number EPA-HQ-OAR-2011-0147

Re: AGA Comments on Mandatory Reporting of Greenhouse Gases,
Proposed Rule to Correct Certain Technical and Editorial Errors,
76 Fed. Reg. 47392 (August 4, 2011)

Dear Ms. Cook:

The American Gas Association (AGA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) proposal to correct certain technical and editorial errors in the rules governing Mandatory Reporting of Greenhouse Gases under 40 C.F.R. Part 98, captioned above (Technical Corrections Proposal). Our comments focus on changes proposed in Subparts A and W, relating to reporting emissions from natural gas distribution operations.

The American Gas Association, founded in 1918, represents 201 local energy companies that deliver clean natural gas throughout the United States. There are more than 70 million residential, commercial and industrial natural gas customers in the U.S., of which 91 percent — more than 64 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies and industry associates. Today, natural gas meets almost one-fourth of the United States' energy needs.

AGA appreciates EPA's effort to correct and clarify the rule for reporting greenhouse gas emissions. Several of the proposed corrections will be helpful. In particular, AGA supports the following items.

1. **Computation of Time in Section 98.3(b)**: We support the clarification that where a deadline for submitting information falls on a weekend or Federal holiday, the information may be submitted to EPA on the next business day. See 76 Fed. Reg. at 47,396. This will be consistent with the familiar rule for computation of time used by the federal courts and other EPA programs. It will also ensure that facilities and suppliers have the time intended for developing good quality data rather than cutting that time short by forcing them to file early (on the day before the holiday or weekend), and it will remove a potential trap for the unwary.
2. **2012 Reporting Deadline** : AGA strongly supports EPA's proposal to allow a one-time six-month extension of the 2012 reporting deadline for facilities and suppliers subject to reporting for source categories such as Subpart W for which data collection began Jan. 1, 2011. See 76 Fed. Reg. at 47,396.

The proposed reporting deadline extension from March 31, 2012 until Sept. 28, 2012 is especially critical for Subpart W sources, because EPA recently proposed several significant changes in Subpart W that would alter the universe of locations subject to the annual on-site leak survey requirement in 2011. The current rule requires natural gas local distribution companies (LDCs) to use methane monitoring equipment such as infrared cameras or equipment qualifying under "Method 21" to search for leaking components in meter runs that they operate at "custody transfer city gate stations." AGA members had a great deal of difficulty and confusion in determining which stations and components would be covered by the undefined terms in the existing rule. They have made their best guess and "muddled through" for this year, but they will not be able to go back in time to survey different stations for 2011 after EPA issues the final revisions in December 2011. Fortunately, we understand that there will be flexibility to use Best Available Monitoring Methods (BAMM) to cope with the fact that our members cannot use a time machine to go back and survey a different universe of regulator stations in 2011 to comply with a rule that will not be final until December 2011. That will be essential. In addition, our members will need additional time to determine the extent to which their work in 2011 will fit the requirements of the December 2011 rule, and to what extent they will need to use BAMM.

Moreover, as we found this year with respect to reporting 2010 emissions under other portions of Part 98, both the agency and stakeholders will need the additional time to develop and beta-test the electronic reporting forms needed to make e-GRRT conform to the newly

revised provisions of the mandatory GHG reporting rules. It will not be possible to complete this process by March 30, 2012 for rule revisions that will not be finalized until December 2011. EPA and stakeholders needed a six month extension for a similar effort in 2011, and we can expect to need the same amount of time in 2012 to incorporate the December 2011 revisions and get e-GRRT ready for reporting under the new requirements by September 28, 2012.

3. **Clarification that Pneumatic Device Venting in W-1 Does not Apply to Natural Gas Distribution:** AGA appreciates the proposed clarification that the definition of GHG1 in section 98.233(a), Equation W-1, are to be reported only for certain listed sectors of the natural gas industry, and that natural gas distribution is not on the list. We thought this was your intent, but it was not clear from the existing rule. See 76 Fed. Reg. at 47,398.
4. **Combustion Emissions from Natural Gas Distribution Operations:** It will be helpful to have additional clarification regarding how to calculate combustion emissions for natural gas distribution facilities, particularly methane combustion emissions. Our members were confused by the existing rule that did not describe how to determine methane emissions from fuel combustion. See 76 Fed. Reg. at 47,399.

AGA appreciates the opportunity to comment. If you have any questions, please contact Pamela Lacey at (202) 824-7340.

Respectfully submitted,

American Gas Association



By: _____

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