



Midstream's Greatest Resource

August 9, 2012

Air and Radiation Docket and Information Center
U.S. Environmental Protection Agency
Mailcode-6102T
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Attention: Docket ID No. EPA-HQ-OAR-2008-0708

Dear Sir or Madam:

On June 7, 2012, the U.S. Environmental Protection Agency ("EPA") published proposed amendments to the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for Reciprocating Internal Combustion Engines ("RICE"), 77 Fed. Reg. 33812 (June 7, 2012). The Gas Processors Association ("GPA") appreciates the opportunity to provide comments on the proposed rulemaking ("Proposed Rule"). The Proposed Rule was issued, in part, to implement a settlement agreement with GPA and other parties which was noticed in the Federal Register on June 21, 2012 at 77 Fed. Reg. 37361.

GPA is a non-profit trade organization made up of approximately 120 corporate members, all of whom are engaged in the processing of natural gas into merchantable pipeline gas, or in the manufacture, transportation, or further processing of liquid products from natural gas. GPA's membership accounts for approximately 92 percent of all natural gas liquids produced by the midstream energy sector in the United States.

GPA members also produce, gather, transmit, and market natural gas and natural gas liquids, and include a number of Canadian and international companies that produce natural gas liquids on a global scale. Member companies of the GPA operate thousands of engines that are affected by this rule. GPA appreciates the EPA's efforts in addressing the issues in the proposed settlement agreement and in publishing the Proposed Rule to implement the settlement. GPA supports the proposed amendments that implement the settlement agreement with GPA. However, as explained below, we have comments on suggestions on several related issues.

In addition to the detailed comments below, GPA supports comments submitted by the American Petroleum Institute ("API").

1. EPA REQUEST FOR COMMENTS

In Section II.G of the Proposed Rule preamble, the EPA requested comments regarding "whether special consideration should be given to engines whose requirements would be reduced by this proposal if, in the final rule, the EPA does not finalize the proposed reduced requirements." 77 Fed. Reg. at 33824.

During and subsequent to prior rulemaking activities on the RICE NESHAP, GPA provided the EPA with detailed data and information related to the impact of the current RICE NESHAP, which was published as a final rule on August 20, 2010. GPA presented data showing that the operating and capital costs associated with compliance with the final regulation are very significant, but are generally mitigated to a manageable level based on the Proposed Rule amendments.

If the amendments are not finalized as proposed, GPA member companies will not have adequate time to achieve compliance by the current compliance deadline of October 19, 2013, specifically with regard to RICE described in the proposed rule as "existing, area source, nonemergency, remote, 4-stroke RICE, greater than 500 HP." Under the current rule, such engines would have to be equipped with exhaust gas catalyst systems to ensure compliance with the

existing source emissions standards. If EPA decides in the final reconsideration rule not to finalize the proposed changes with respect to such engines, GPA member companies will have only about 9 months to budget, design, procure, install, and start up the needed control systems for the hundreds of affected engines. In most cases, it would be impossible for companies to comply with the rule in this short period of time. In addition, companies would not have enough time to implement the "alternative monitoring demonstration" for area source engines requiring catalyst. As a result, relief must be provided for these engines in the event the proposed amendments are not finalized. GPA recommends that such engines should be provided a full three years from the date of finalization of these rule amendments to achieve compliance.

2. GACT FOR REMOTE ENGINES AT AREA SOURCES

GPA supports EPA's decision for a "generally available control technology or management practice" (GACT) for remote engines located at area sources of HAP instead of the more stringent "maximum achievable control technology" (MACT) that is required for engines at major sources. The proposed equipment standards and management practices are less burdensome on operators, while still ensuring protection of health and the environment for engines that are remote from human activity.

Similarly, GPA supports the proposed inclusion of a definition for remote stationary RICE and the qualifying criteria in 63.6675.

3. ALTERNATIVE COMPLIANCE DEMONSTRATIONS FOR ENGINES AT AREA SOURCES

GPA supports the simplified alternative compliance demonstration options in 63.6630 and 63.6640, including the option to measure carbon monoxide rather than formaldehyde for 4SRB engines, lower cost portable emissions analyzer ("PEA") test methods, and the option to use a high temperature shutdown device to protect the catalyst in lieu of a temperature continuous parameter monitoring

system ("CPMS"). These are all appropriate commonsense alternative methods that ensure compliance with the HAP emissions limitations for these engines located at area sources.

4. THC ALTERNATIVE TO FORMALDEHYDE MEASUREMENT

GPA supports allowing total hydrocarbon ("THC") reduction to be used as an alternative to formaldehyde reduction for verifying compliance with the catalyst percent reductions standard for 4SRB engines using NSCR. The option for demonstrating a THC reduction of at least 30 percent in place of demonstrating formaldehyde reduction provides operators with more test flexibility and a potentially less expensive test method, while still providing a valid indication of catalyst performance.

5. CO AND THC REDUCTION COMPLIANCE DEMONSTRATION

GPA recommends that simultaneous pre- and post-catalyst measurements be optional for area source engines that require catalytic controls. Sequential testing of the inlet and outlet is more than adequate. Unlike performance testing procedures requiring a 1-hour test run, when conducting tests with a 15-minute test run, it is very unlikely that an engine will experience significant changes in engine load, ambient air temperature, or natural gas fuel composition during sequential tests. Thus, sequential tests conducted over a short period of time will provide comparable data to simultaneous testing over a similarly short period of time.

6. CORRECTION TO TABLE 2b TITLE

GPA notes that the title of Table 2b still references "*Operating limitations for... existing 4SLB stationary RICE >500 HP located at an area source of HAP emissions*". Table 2b has been amended such that this set of engines is no longer addressed by Table 2b. GPA suggests the identified text be removed from the Table 2b title.

7. TEXT OF 40 CFR 63.6603(a)

The language in existing 40 CFR 63.6603 "What Emission Limitations And Operating Limitations Must I Meet If I Own Or Operate An Existing Stationary RICE Located At An Area Source Of HAP Emissions?" remains unchanged in the proposed amendments and states:

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you.

GPA notes that Table 1b has been amended to include requirements only for select stationary RICE at major sources and Table 2b has been amended to include requirements only for stationary RICE at major sources and certain CI stationary RICE. GPA suggests that the language in 40 CFR 63.6603(a) be amended to clearly reflect the engines, and their associated tables, to which this section applies.

8. CORRECTION TO 40 CFR 63.6630

63.6630(d) says, "*Non-emergency 4SRB stationary RICE complying with the requirement to reduce formaldehyde emissions by 76 percent or more can demonstrate initial compliance with the formaldehyde emission limit by testing for THC instead of formaldehyde. The testing must be conducted according to the requirements in Table 4 of this subpart. The average reduction of emissions of THC determined from the performance test must be equal to or greater than 30 percent.*" However, the THC compliance demonstration option is only available for engines using NSCR, according to Table 5, Item 8(a)(i) and the preamble page 33816, "...the EPA agrees with the petitioner that for SI 4SRB engines **using NSCR** and meeting the NESHAP by showing a percentage reduction of HAP, it would be appropriate to allow sources to demonstrate compliance with

the NESHAP by showing a THC reduction of at least 30 percent.” [emphasis added]

Therefore, GPA recommends the following language change to provide consistency with Table 5 Items 7 and 8:

*63.6630(d) Non-emergency 4SRB stationary RICE complying with the requirement to reduce formaldehyde emissions by 76 percent or more **using NSCR** can demonstrate initial compliance with the formaldehyde emission limit by testing for THC instead of formaldehyde. The testing must be conducted according to the requirements in Table 4 of this subpart. The average reduction of emissions of THC determined from the performance test must be equal to or greater than 30 percent.”*

9. 1-HOUR VS. 15-MINUTE TEST RUNS

Paragraphs 63.6603 and 63.6620(d) both state that the average of three 1-hour test runs are required. These paragraphs are applicable to existing nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year. However, 63.6630(e)(1) and (2) allows three 15-minute test runs, and 63.6640(c)(1) and (2) allows one 15-minute test run. The language in 63.6603 and 63.6620(d) should be clarified to prevent confusion about the required test duration. GPA's suggestion is:

*63.6603 “Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three **1-hour** runs using the testing requirements and procedures in 63.6620 and Table 4 to this subpart. **Each test run must last at least 1 hour unless otherwise specified in this subpart.**”*

63.6620(d) *"You must conduct three separate test runs for each performance test required in this section, as specified in 63.7(e)(3). Each test run must last at least 1 hour unless otherwise specified in this subpart."*

10. CATALYST INLET TEMPERATURE NOT SPECIFIED IN RULE

On page 33822 of the preamble, referring to nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year, EPA says, "...or, alternatively, the owner or operator can monitor the catalyst inlet temperature continuously and maintain the temperature within the range specified in the rule. For 4SLB engines the catalyst inlet temperature must remain at or above 450 °F and at or below 1,350 °F. For 4SRB engines the temperature range must be greater than or equal to 750 °F and less than or equal to 1,250 °F at the catalyst inlet."

However, these temperature ranges are never specified in the rule. GPA suggests that these ranges be added to Table 5 Items 13 and 14, and to Table 6 Items 14 and 15.

11. CLARIFICATION FOR EQUATION 4

63.6620(e)(2)(iii) contains Equation 4, which is used for calculating the CO, THC, and formaldehyde gas concentrations adjusted to 15 percent O₂ using CO₂.

The rule text provides explanation for the term "%CO₂", but the remaining terms "C_{adj}", "C_d", and "X_{CO₂}" are unexplained. Please add descriptions for each of these terms, including units if applicable.

12. REVISIONS TO TABLE 4

Sections 40 CFR 63.6630 and 40 CFR 63.6640 state the requirements for demonstrating compliance for 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that are operating more than 24 hours per calendar year.

Various paragraphs in these sections reference Table 4 to Subpart ZZZZ for the requirements for performance tests, however, there are not corresponding items in Table 4 that reflect the requirements in Sections 40 CFR 63.6630 and 40 CFR 63.6640 for these engines, which are subject to compliance demonstrations, not performance tests. GPA recommends that Table 4 be modified as noted below. The proposed language changes are in bold/underlined text.

As stated in §§ 63.6610, 63.6611, 63.6612, <u>63.6630</u> , and 63.6640, you must comply with the following requirements for performance tests for stationary RICE:				
TABLE 4 TO SUBPART ZZZZ OF PART 63—REQUIREMENTS FOR PERFORMANCE TESTS <u>AND</u> COMPLIANCE DEMONSTRATIONS				
For each ...	Complying with the requirement to ...	You must ...	Using ...	According to the following requirements ...
1. 2SLB, 4SLB, and CI stationary RICE, <u>except for nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year.</u>	a. reduce CO emissions			NO CHANGE TO LANGUAGE
2. 4SRB stationary RICE	a. reduce formaldehyde emissions			NO CHANGE TO LANGUAGE
3. Stationary RICE, <u>except for nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year.</u>	a. limit the concentration of formaldehyde or CO in the stationary RICE exhaust			NO CHANGE TO LANGUAGE
4. <u>Nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that</u>	<u>a. reduce CO emissions</u>	<u>i. Measure the O2 at the inlet and outlet of the control device; and</u>	<u>(1) Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522-00 (2005)² (incorporated by reference, see § 63.14),</u>	<u>(a) Measurements to determine O2 must be made at the same time as the measurements for CO concentration. Each test run must be</u>

<p><u>are not remote stationary RICE and that operate more than 24 hours per calendar year.</u></p>		<p>ii. <u>Measure the CO at the inlet and the outlet of the control device.</u></p>	<p>or 40 CFR part 63, subpart ZZZZ, appendix A.</p> <p>(1) ASTM D6522-00 (2005)^{a,b} (incorporated by reference, see § 63.14) or Method 10 of 40 CFR part 60, appendix A, or 40 CFR part 63, subpart ZZZZ, appendix A.</p>	<p><u>of at least 15 minute duration, except if using 40 CFR part 63, subpart ZZZZ, appendix A, then each test must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.</u></p> <p>(a) <u>The CO concentration must be at 15 percent O₂, dry basis. Each test run must be of at least 15 minute duration, except if using 40 CFR part 63, subpart ZZZZ, appendix A, then each test must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.</u></p>
<p>5. <u>Nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year.</u></p>	<p>a. <u>reduce THC emissions</u></p>	<p>i. <u>Measure the O₂ at the inlet and outlet of the control device; and</u></p> <p>ii. <u>Measure the THC at the inlet and the outlet of the control device.</u></p>	<p>(1) <u>Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522-00 (2005)^a (incorporated by reference, see § 63.14), or 40 CFR part 63, subpart ZZZZ, appendix A.</u></p> <p>(1) <u>Method 25A of 40 CFR part 60, appendix A.</u></p>	<p>(a) <u>Measurements to determine O₂ must be made at the same time as the measurements for THC concentration. Each test run must be of at least 15 minute duration, except if using 40 CFR part 63, subpart ZZZZ, appendix A, then each test must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.</u></p> <p>(a) <u>The THC concentration must be at 15 percent O₂, dry basis.</u></p>
<p>6. <u>Nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year.</u></p>	<p>a. <u>limit the concentration of CO in the stationary RICE exhaust</u></p>	<p>i. <u>Select the sampling port location and the number of traverse points; and</u></p> <p>ii. <u>Measure the O₂ of the stationary RICE exhaust at the sampling port location; and</u></p>	<p>(1) <u>Method 1 or 1A of 40 CFR part 60, appendix A § 63.7(d)(1)(i), or 40 CFR part 63, subpart ZZZZ, appendix A.</u></p> <p>(1) <u>Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522-00 (2005)^a (incorporated by reference, see § 63.14).</u></p>	<p>(a) <u>Measurements to determine O₂ must be made at the same time as the measurements for CO concentration. Each test run must be</u></p>

		<p>iii. <u>ii. Measure the CO of the stationary RICE exhaust at the sampling port location</u></p>	<p><u>or 40 CFR part 63, subpart ZZZZ, appendix A.</u></p> <p><u>(1) ASTM D6522-00 (2005),⁴³ (incorporated by reference, see § 63.14) or Method 10 of 40 CFR part 60, appendix A, or 40 CFR part 63, subpart ZZZZ, appendix A.</u></p>	<p><u>of at least 15 minute duration, except if using 40 CFR part 63, subpart ZZZZ, appendix A, then each test must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.</u></p> <p><u>(a) The CO concentration must be at 15 percent O2, dry basis. Each test run must be of at least 15 minute duration, except if using 40 CFR part 63, subpart ZZZZ, appendix A, then each test must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.</u></p>
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13. CORRECTION TO FOOTNOTES OF TABLE 2c AND 2d

The language in footnote 2 for Table 2c should be amended to reference 40 CFR 63.6625(j) as well as 40 CFR 63.6625(i).

“Sources have the option to utilize an oil analysis program as described in 63.6625(i) or 63.6625(j) in order to extend the specified oil change requirement in Table 2c on this subpart.”

The language in footnote 1 for Table 2d should be amended to reference 40 CFR 63.6625(j) as well as 40 CFR 63.6625(i).

“Sources have the option to utilize an oil analysis program as described in 63.6625(i) or 63.6625(j) in order to extend the specified oil change requirement in Table 2d on this subpart.”

14. CORRECTION TO TABLE 2c TITLE

GPA notes that the title of Table 2c references "... existing spark ignition stationary RICE >500 HP located at a major source of HAP emissions". GPA believes this should read as it did in the prior version of the rule: "... existing spark ignition stationary RICE ≤500 HP located at a major source of HAP emissions".

15. SUBSEQUENT COMPLIANCE DEMONSTRATIONS

The current language in 63.6615 and Table 3 does not reference the subsequent annual compliance demonstrations required for existing nonemergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that are operated more than 24 hours per calendar year per 63.6640(c), which could be misleading.

GPA suggests the following changes:

*63.6615 When Must I Conduct Subsequent Performance Tests **and Compliance Demonstrations***

*If you must comply with the emission limitations, operating limitations, **or other requirements**, you must conduct subsequent performance tests **or compliance demonstrations** as specified in Table 3 of this subpart.*

*Table 3 to Subpart ZZZZ of Part 63 - Subsequent Performance Tests **and Compliance Demonstrations***

As stated in §§ 63.6615 and 63.6620, you must comply with the following subsequent performance test requirements or compliance demonstrations:

TABLE 3 TO SUBPART ZZZZ OF PART 63—SUBSEQUENT PERFORMANCE TESTS AND COMPLIANCE DEMONSTRATIONS		
For each ...	Complying with the requirement to ...	You must ...
6. <u>4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year.</u>	Reduce CO or THC emissions	Conduct subsequent compliance demonstrations annually.
7. <u>4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that operate more than 24 hours per calendar year.</u>	<u>Limit the concentration of CO in the stationary RICE exhaust</u>	Conduct subsequent compliance demonstrations annually.

16. CORRECTION TO TITLE OF TABLE 5

The current, unchanged, title for Table 5 is “Initial Compliance with Emission Limitations and Operating Limitations”. GPA suggests that this title be renamed to “Initial Compliance with Emissions Limitations, Operating Limitations, and Other Requirements”. This change is to align the table title with the language in 63.6630(a). Additionally, Table 5 Items 13 and 14 contain the requirement to install an oxidation catalyst and install NSCR, respectively, and neither of these requirements are emission limitations or operating limitations.

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Thank you for the opportunity to submit these comments. Please do not hesitate to contact the undersigned if you have questions or need more information.

Sincerely,

A handwritten signature in black ink that reads "Jeff Applekamp". The signature is written in a cursive style with a large, stylized "J" and "A".

Jeff Applekamp
Director, Government Affairs
Gas Processors Association

cc: R. Wayland, US EPA
M. King, US EPA
M. Horowitz, US EPA