REGION 10
SEATTLE, WA 98101

June 17, 2024

Mr. George McCarty
Director, Engineering, BD, and Optimization
Enerfin Resources
2250 East 73rd Street, Suite 410
Tulsa, Oklahoma 74136

Re: Request for Alternative Monitoring Methodology for measurement of VHAP

Dear Mr. McCarty:

This letter is in response to your letter on behalf of Enerfin Resources (Enerfin) to the U.S. Environmental Protection Agency (EPA), Region 10 dated January 8, 2024, requesting approval from the EPA to use the Gas Processor Association (GPA) standards 2261-20 (*Analysis for Natural Gas and Similar Gaseous Mixtures by Gas Chromatography*) and 2286-14 (*Method for the Extended Analysis for Natural Gas and Similar Gaseous Mixtures by Temperature Program Gas Chromatography*) in lieu of the EPA Method 18 for compositional analysis of high-pressure natural gas streams.

Background
Enerfin owns and operates a natural gas production and gathering operation in northwest Oregon (known as the Mist Gas Field). The natural gas produced by the Mist Gas Field is blended with pipeline-quality natural gas provided by Northwest Natural Gas Company at the Miller Station. The equipment and piping at Miller Station that contains both the field natural gas stream and blended natural gas stream are potentially subject to the equipment leak standards in 40 CFR Part 63, Subpart HH, *National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities* (NESHAP HH).

To be subject to the equipment leak standards in NESHAP HH, the equipment at the Miller Station must operate in volatile hazardous air pollutant (VHAP) service equal to or greater than 300 hours per calendar year (40 CFR 63.769). Per 40 CFR 63.761, being in VHAP service is defined as, "…a piece of ancillary equipment or compressor either contains or contacts a fluid (liquid or gas) which has a total volatile HAP (VHAP) concentration equal to or greater than 10 percent by weight as determined according to the provisions of § 63.772(a)." 40 CFR 63.772(a) states that equipment and compressors are presumed to be in VHAP service unless an owner or operator demonstrates that the piece of equipment is not in VHAP service. To determine the percent VHAP content of the natural gas streams, 40 CFR 63.772(a)(1) states that either the EPA Method 18 or ASTM D6420-99 test methods must be used.

On January 8, 2024, Enerfin sent a letter requesting approval from the EPA to use GPA standards 2261-20 and 2286-14 in lieu of EPA Method 18 to determine the natural gas composition. As part of Enerfin's letter, they included GPA standard 2286-14 gas analyses for both the blended natural gas stream and the pipeline-quality natural gas stream to demonstrate that the total VHAP concentration is less than 10 percent in the natural gas streams. Additionally, Enerfin included an EPA written Memorandum dated June 23, 2010, that approved the use of GPA Method 2261 in place of Method 18 as it related to a request made by Atlas Pipeline.[1]

On March 13, 2024, Enerfin provided the chromatogram analyses for the two sampled gas streams to demonstrate that there were no additional VHAPs in the natural gas streams that weren't previously identified in the analyses provided in the January letter.

Determination
Based on the information provided by Enerfin, the EPA is approving the use of GPA standards 2261-20 and 2286-14 as equivalent compliance approaches as EPA Method 18 to determine applicability for NESHAP HH equipment leak standards at the Mist Gas Field.

If you have any questions about this matter, please contact Ms. Valerie Gardner of my staff at (907) 271-6561 or gardner.valerie@epa.gov.

Sincerely,

DAVID BRAY Digitally signed by DAVID BRAY
Date: 2024.06.17 16:36:47 -07'00'

David Bray, Branch Manager
Air Permits, Toxics, Transportation,
and Communities Branch
Air and Radiation Division

cc: Mr. Dan DeFehr
Oregon Department of Environmental Quality

[1] Memorandum from Conniesue Oldham, Group Leader, Measurement Technology Group to David F. Garcia, Air/Toxics and Inspection Coordination Branch, EPA Region 6, Re: Atlas Pipeline Alternative Test Method Request.