



# Methane Challenge Continuous Improvement

April 8, 2020



# Methane Challenge

## Continuous Improvement

- The notion of “Continuous Improvement” was built into the Methane Challenge Program
- Methane Challenge finalized this process in 2018
  - Allows for partners and EPA to propose changes or updates to program
  - Partners and the public can provide feedback on proposed change
  - Process can be used for updates in either commitment option
- Updates to the program may include (but are not limited to):
  - Adding a new emission source
  - Adding a new BMP to an existing emission source
  - Revising reporting methodologies and/or data elements

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## Continuous Improvement Process

Step 1	Partner submits written proposal to EPA <i>(Note: a proposal can be initiated by a program Partner or EPA)</i>
Step 2	EPA reviews proposal (using evaluation criteria) to assess completeness, relevance, feasibility, and program's capabilities
Step 3	EPA communicates results of initial review to Partner; if appropriate, EPA works with Partner to develop a Program technical document
Step 4	EPA shares draft technical document with Methane Challenge partners (and public via website); stakeholders have ~ one month to provide feedback
Step 5	EPA revises technical document as needed
Step 6	EPA implements change (as resources allow)

Learn more about the process: <https://www.epa.gov/natural-gas-star-program/methane-challenge-program-continuous-improvement-fact-sheet>

# Proposed Program Update

- National Fuel Gas will share a proposed BMP focused on compressor isolation and blowdown valves at transmission compression stations
- Methane Challenge is considering adding this as an initial Equipment Leaks commitment option for the Transmission Segment
- Proposal was published on the Methane Challenge website on February 27, 2020
  - <https://www.epa.gov/natural-gas-star-program/continuous-improvement-proposal-equipment-leaks-compressor-valves>
- *If the proposal is finalized, the Program remains interested in additional updates and expansions in the future:*
  - Expanding the scope of the Equipment Leaks/Fugitive Emissions source
  - Evaluating options for upstream segments
- Reminder: as with all other BMPs in this program, the BMP detailed in the proposal is intended to be a *voluntary* action to mitigate methane emissions

# Feedback

- Methane Challenge is accepting feedback on the proposal until April 24, 2020
- Please email feedback to [GasSTAR@epa.gov](mailto:GasSTAR@epa.gov)
- The Program welcomes feedback on any aspect of the proposal but is particularly interested in feedback on the following:
  - Whether this BMP would better fit under one of the existing compressor commitment options
  - The proposed frequency of voluntary leak surveys
  - The proposed timeframe of having up to 3 years to replace or repair a leaking valve
  - The proposed timeframe of 90 days to re-measure a unit's leak rate after a valve repair or replacement (for the purposes of calculating an emissions reduction)
  - If there are other equipment leak or fugitive emission sources to which this proposed approach could apply