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
| Step 1       | Partner submits written proposal to EPA  
|             | *(Note: a proposal can be initiated by a program Partner or EPA)* |
| 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](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](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

• 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