



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 18 2006

Christopher M. Trejchel
Senior Attorney
National Fuel Gas Distribution Corporation
P.O. Box 2081
Erie, PA 16512

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Mr. Trejchel:

This is in response to the correspondence that National Fuel Gas Distribution Corporation (National Fuel) sent to the Environmental Protection Agency (EPA) on June 23, 2006, requesting an alternative sampling location to be authorized under 40 CFR 761.30(i). The alternative sampling location proposed is the area of sampling at aboveground facilities called orifice plates. These orifice plates are used to create pressure differentials to permit measurement of the gas flow and allow mixing with mercaptan as an odorant. These orifice plates are reportedly located in the National Fuel System near interconnect points with upstream pipes.

EPA does not believe that the use of the alternative sampling location, the orifice plates, as proposed by National Fuel would provide a representative picture of PCB contamination in the natural gas pipeline system. A representative sample is accomplished by the collection of condensate at the geological low point of the pipeline or at drip collection points.

Based on the above conclusion, EPA cannot authorize the use of the alternative sampling location, the orifice plates, as proposed by National Fuel. National Fuel should comply with the provisions of 40 CFR 761.30(i) to meet the sampling requirements. If you have further questions, please contact Sara McGurk at (202) 566-0480.

Sincerely,

A handwritten signature in cursive script that reads "Maria J. Doa".

Maria J. Doa, Ph.D.
Director
National Program Chemicals Division

cc. Dan Kraft
Region II PCB Coordinator

Kelly Bunker
Region III PCB Coordinator