



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUN 23 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Atlas Pipeline Alternative Test Method Request

FROM: Conniesue Oldham, Group Leader *Connie Oldham*
Measurement Technology Group (E143-02)

TO: David F. Garcia, Chief
Air/Toxics and Inspection Coordination Branch (6EN)
EPA Region 6

In a letter to EPA Region 6 dated July 21, 2009, Atlas Pipeline Mid-Continent asked to use an alternative method to determine the heat content of gases burned in a closed-system, non-assisted flare at its Velma Gas Plant in Velma, Oklahoma. The flare is subject to 40 CFR Part 60 Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants, and is required under Part 60.18 to use Method 18 (Appendix A of Part 60) to determine the flare gas components for calculating heat content.

Atlas is asking for a testing waiver due to the design characteristics of the flare and the inherent nature of the gas burned in the flare. They submitted data showing a worst-case fuel analysis using GPA Method 2261 and asked that the method be allowed as an alternative to Method 18 in this case.

We have approved the use of GPA Method 2261 in past applications because the procedure is very similar to Method 18. We consider this procedure to be acceptable and approve Atlas's request to use it in place of Method 18 in satisfying the requirements of 60.18(f)(3) as related to Subpart KKK. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063 or you may e-mail him at curtis.foston@epa.gov.

cc: Foston Curtis (E143-02)
Marcia Mia, OECA
Tony Robledo, Region 6