



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

April 29, 2015

Jason Rauen  
Senior Specialist  
EOG Resources, Inc.  
600 Seventeenth Street  
Suite 1000N  
Denver, CO 80202

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Mr. Rauen:

I write in response to your letter of February 13, 2015, requesting the use of an alternative approach to the field record requirements of Section 11.2.1 of EPA Method 22, 40 CFR part 60 Appendix A-7, in application of Method 22 as visible emissions inspections in accordance with regulations given in 40 CFR part 60 Subpart OOOO "Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution," 40 CFR 63.11(b), and 40 CFR part 63, Subpart HH "National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities."

Section 11.2.1 of Method 22 requires the recording of company name, industry, process unit, observer's name, observer's affiliation, date, estimated wind speed, wind direction, sky condition, and a sketch of the process unit being observed showing the observer location relative to the source and the sun and an indication of the potential and actual emission points. You request to use digital photographic documentation in lieu of sketch or recorded information for relative position of the observer to the source and sun, potential and actual emissions points, and sky conditions during the measurement. Your request seeks to improve efficiencies and allow for new technology in the recordkeeping process of Method 22, especially with respect to the transition to electronic systems.

We approve this alternative for the use of digital photographic documentation for the following parts of Section 11.2.1 of Method 22:

1. Sky condition,
2. Observer's location relative to the source,
3. Observer's location relative to the sun,
4. Sketch of process unit being observed,
5. Potential emission points, and
6. Actual emission points.

In order to use the digital photographic documentation, the following criteria must be met:

- The image must have the proper field of view and depth of field to properly distinguish the sky condition, process unit, potential emission point and actual emission point.

- The image must be taken from the point of view of the observer.
- The image must be taken within a reasonable time of the observation to show sky conditions and sun location (i.e., within 15 minutes of the start or end time of the Method 22 observation).
- If the image is annotated or altered (e.g., to highlight the potential emission points), the original unaltered digital image must be retained per the appropriate recordkeeping provisions (e.g., those contained in 40 CFR 63.10).

This approval is applicable only to the outside location field record (Section 11.2.1 of Method 22).

We believe your alternative method would be applicable to source categories other than the ones you mention, therefore, we approve the use of this alternative whenever Method 22 is required by any federal regulation within 40 CFR parts 60, 61, or 63. Since this alternative method will be available for use by other facilities, we will post this broadly applicable alternative test method on our website at <http://www.epa.gov/ttnemc01/approalt.html> for use by other interested parties.

If you have any questions or would like to discuss this matter further, please call Jason M. DeWees of my staff at (919)-541-9724, or you may email him at [deweese.jason@epa.gov](mailto:deweese.jason@epa.gov).

Sincerely,



Barrett H. Parker, Acting Leader  
Measurement Technology Group

Cc: Jason DeWees, EPA/OAQPS/AQAD  
Robin Segall, EPA/OAQPS/AQAD  
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