



United States Environmental Protection Agency  
Washington, DC 20460

**Optional Form - Best Available Monitoring Methods (BAMM) Request for the  
emission sources identified in 98.234(f)(8),  
Subpart W: Petroleum and Natural Gas Systems  
Mandatory Reporting of Greenhouse Gases (40 CFR Part 98)  
Office of Atmospheric Programs**

**General Information:** For the emission sources identified in 40 CFR 98.234(f)(8), you may use this optional form to request to use Best Available Monitoring Methods (BAMM) for unique or unusual circumstances as described in 40 CFR 98.234(f)(8). You are not required to use this optional form for the purposes of fulfilling the requirements in 40 CFR 98.234(f)(8) for submitting your BAMM request to EPA. However, your submission must contain the information outlined in 40 CFR 98.234(f)(8)(ii) for the purposes of submitting a BAMM request to EPA for review. Also, your BAMM request must be submitted through the electronic Greenhouse Gas Reporting Tool (e-GGRT), and if a Notice of Intent (NOI) is also required, it also must be submitted through e-GGRT.

If you are an owner or operator subject to Subpart W of 40 CFR Part 98 and have sources eligible for BAMM under 98.234(f)(8), you may use BAMM through December 31, 2011 without submitting a BAMM request to EPA for approval by the Administrator. You do not need to submit a BAMM request to EPA if you choose to use BAMM for any time period in 2011.

To obtain approval to use BAMM for any time period beyond December 31, 2011, a BAMM request must be submitted to EPA that demonstrates to the EPA Administrator's satisfaction that the owner or operator faces unique or unusual circumstances such as, but not limited to, clearly demonstrated data collection methods that do not meet safety regulations, technical infeasibility, or counter to other local, State, or Federal regulations.

In order to use BAMM during 2012, according to the requirements in 40 CFR 98.234(f)(8)(i), you must first submit an initial notice of intent (NOI) by January 3, 2012, followed by a BAMM extension request by March 30, 2012. You will not be eligible to use BAMM for any time period in 2012 if you do not submit an initial NOI by January 3, 2012, followed by the actual BAMM request containing the information specified in 40 CFR 98.234(f)(8)(ii) by March 31, 2012.

If you anticipate a need to use BAMM for any time period beyond December 31, 2012, you must submit a BAMM request to the Administrator for approval by September 30 of the preceding year that BAMM is being sought. Again, you may use this optional form to request BAMM for beyond December 31, 2012, for unique or unusual circumstances as described in 40 CFR

98.234(f)(8). The BAMM request must contain the information specified in 40 CFR 98.234(f)(8)(ii).

The following table summarizes the important dates for subpart W BAMM requests for sources identified in 40 CFR 98.234(f)(8) .

**Important Dates for Subpart W BAMM Requests For Sources Identified in 40 CFR 98.234(f)(8)**

Emissions Sources	Is Automatic BAMM Available in 2011?	May I use BAMM beyond December 31, 2011?
<b>Well-related emissions 98.234(f)(2)</b>		
Gas well venting during well completions and well workovers with hydraulic fracturing (§ 98.233(g))		
Well testing venting and flaring (§ 98.233(l))		
<b>Specified Activity Data 98.234(f)(3)</b>		
Cumulative hours of venting, days, or times of operation in § 98.233(e), (f), (g), (h), (l), (o), (p), (q), and (r).		
Number of blowdowns, completions, workovers, or other events in § 98.233(f), (g), (h), (i), and (w).		Yes.
Cumulative volume produced, volume input or output, or volume of fuel used in paragraphs § 98.233(d), (e), (j), (k), (l), (m), (n), (x), (y), and (z).		
<b>Leak Detection and Measurement 98.234(f)(4)</b>		
Reciprocating compressor rod packing venting in onshore natural gas processing, onshore natural gas transmission compression, underground natural gas storage, LNG storage, and LNG import and export equipment as specified in § 98.232(d)(1), (e)(1), (f)(1), (g)(1), and (h)(1).	Yes.	
Centrifugal compressor wet seal oil degassing venting in onshore natural gas processing, onshore natural gas transmission compression, underground natural gas storage, LNG storage, and LNG import and export equipment as specified in § 98.232(d)(2), (e)(2), (f)(2), (g)(2), and (h)(2).	<b>Jan 1- Dec 31, 2011.</b> No requests for approvals to use BAMM during this time period are required.	<b>To use BAMM for any time period in 2012,</b> a Notice of Intent (NOI) must be submitted by December 31, 2011 followed by a BAMM request consistent with 40 CFR 98.234(f)(8)(ii) by March 30, 2012. If both of these submissions are made by the above-mentioned deadlines, BAMM will be automatically granted thru June 30, 2012, regardless of whether the BAMM request is ultimately approved by EPA. To use BAMM beyond June 30, 2012, EPA must approve the BAMM request.
Acid gas removal vent stacks in onshore petroleum and natural gas production and onshore natural gas processing as specified in § 98.232(c)(17) and (d)(6) <sup>1</sup> .		
Equipment leak emissions from valves, connectors, open ended lines, pressure relief valves, block valves, control valves, compressor blowdown valves, orifice meters, other meters, regulators, vapor recovery compressors, centrifugal compressor dry seals, and/or other equipment leaks in onshore natural gas processing, onshore natural gas transmission compression, underground natural gas storage, LNG storage, LNG import and export equipment,		<b>To use BAMM beyond December 31, 2012,</b> you must submit a BAMM request by September 30 of the preceding year for which BAMM is being sought. <i>For example, if you would like to request BAMM for 2013, you must submit your BAMM request by September 30, 2012.</i>

<sup>1</sup> Please note that although BAMM is available for acid gas removal vent stacks, the need for BAMM for this emissions source may be limited, because in the absence of a continuous emissions monitoring system or a vent stack meter that is already in place, reporters may use engineering estimates to estimate emissions.

and natural gas distribution as specified in § 98.232(d)(7), (e)(7), (f)(5), (g)(3), (h)(4), and (i)(1).		
Condensate (oil and/or water) storage tanks in onshore natural gas transmission compression as specified in § 98.232(e)(3).		
<b>Other sources not listed above. 98.234(f)(5)(iv)</b>		

You must submit the NOI and BAMB through the electronic GHG Reporting Tool (e-GGRT).

Please note, in order to submit your NOI and BAMB through e-GGRT, as required, you must register with e-GGRT and identify at least one designated representative to submit the notification(s). Facilities that will be reporting under subpart W that also reported in 2011 are already registered with e-GGRT. For facilities reporting for the first time in 2012, you must register with e-GGRT prior to submitting the NOI. Please be aware that the registration process involves multiple steps and can take several days, so please plan accordingly.

For more information, please see the website link

[http://www.epa.gov/climatechange/emissions/e-ggert\\_registration.html](http://www.epa.gov/climatechange/emissions/e-ggert_registration.html).

You will find instructions for registering with e-GGRT at

<http://www.ccdsupport.com/confluence/display/help/Registration+Instructions>.

In addition, you will find a number of Frequently Asked Questions about user and facility registration, among other issues, at <http://www.ccdsupport.com/confluence/display/help/FAQs>.

EPA will evaluate your BAMB Request to confirm that it is consistent with 40 CFR 98.234(f)(8). As time allows, EPA may follow up on BAMB requests with additional questions. After June 30, 2012 the requester must discontinue using BAMB and begin following all applicable monitoring and QA/QC requirements of subpart W and part 98 no later than July 1, 2012, unless before that date EPA approves a BAMB Request for use beyond June 30, 2012. EPA reserves the right to review BAMB Requests submitted after their applicable deadlines, but will only consider and approve late requests that demonstrate unforeseen unique or unusual circumstances as outlined in 40 CFR 98.234(f)(1).

**Paperwork Burden Estimate:** The public reporting and recordkeeping burden for this collection of information is estimated to average 60 minutes per response (the burden was already included in ICR 2376.02). This is an optional application form. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave. NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do NOT send the completed form to this address.

**Optional Form - Request to use BMM Beyond December 31, 2011 for Sources Identified in 40 CFR 98.234(f)(8)**

<b>Facility and Segment Information</b>	
<b>1. Facility name</b>	
<b>2. Industry segment:</b>  Please enter appropriate rule segment, from <b>40 CFR 98.230</b>	
<b>Listing of Specific Sources for BMM 40 CFR §98.234(f)(8)(ii)(A)</b>	
<b>3. Please list the specific source categories and parameters for which BMM is being requested. Please attach documentation as necessary.</b>	
<b>Reason for BMM Request 40 CFR §98.234(f)(8)(ii) (B)</b>	
<b>4. For each specific source for which BMM is being sought, include a description of the unique or unusual circumstances, such as data collection methodologies that do not meet safety regulations, technical infeasibility, or specific laws or regulations that are counter to data collection methods that conflict with each specific source. Please attach additional documentation as necessary.</b>	
<b>5. Please indicate the BMM chosen in place of the rule requirements such as company records, other engineering estimates, available data, etc. If the BMM chosen differs by emission source category, please identify the BMM chosen for each category choice.</b>	

**Specific Actions to Comply with Subpart W  
§98.234(f)(8)(ii)(C)**

**6. Include a detailed explanation and supporting documentation of how and when the owner or operator will comply with all of the subpart W reporting requirements. Indicate the time period for which BMM is being requested. Please attach additional documentation as necessary.**