

eBrief **A**

www.GPAglobal.org • (918) 493-3872

December 2014 eBrief Print Version

Headlines:

GPA staff changes

New GPA and GPSA web sites coming soon

GPA Convention registration to open next month

GPA to submit NFPA 56 comments

Ad Hoc Brazed Aluminum Heat Exchanger Committee holds first meeting

GPA addresses EPA's proposed changes to emission factors for industrial flares

GPA files National Pipeline Mapping System data collection comments

GPA opposes proposed changes to natural gas operating day

Environmental Excellence Award applications due Jan. 30

GPA attends **ASTM** winter meeting

Technical Section F – Research fall meeting recap

GPA staff changes

We are pleased to announce that we have hired Matt Hite as our vice president of government affairs. Matt will lead our federal advocacy activities in Washington, D.C., and will be instrumental in opening the GPA Office of Federal Affairs there. Matt has served as policy counsel and committee executive to the Environment, Technology & Regulatory Affairs Division at the U.S. Chamber of Commerce since 2012. In that role, he handled a variety of environmental issues and also managed the Chamber's Environment and Agriculture Committee, the policymaking body for environment and agriculture issues and initiatives.

Before joining the Chamber, he spent close to a decade working on Capitol Hill. He was senior counsel to Ranking Member Jim Inhofe (R-OK) on the U.S. Senate Committee on Environment and Public Works where he handled a number of agency oversight and regulatory issues. Matt was the point person for a number of energy and environmental legislative initiatives in the U.S. Senate and was responsible for vetting and ushering various EPA executive nominees through the committee vetting process. We are pleased to bring his expertise to our staff and look forward to him officially joining us in mid-January. For federal advocacy questions or needs in the meantime, please direct those to Mark Sutton or Johnny Dreyer.

Jeff Applekamp left GPA to take another position in the industry, and Debbie Beaver has stepped into our open director of state affairs position. Prior to joining GPA in February 2013 as our director of technical services, Debbie worked in government affairs for The Williams Companies, facilitating the involvement of the company in legislative and regulatory venues, serving as a liaison between regulatory agencies and state legislatures, and providing management with guidance and updates on legislation affecting company policies. Debbie had a 27-year career with The Williams Companies in various government affairs roles with considerable experience lobbying in Texas, New Mexico, Oklahoma and Kansas. We are lucky to bring her experience and expertise to our director of state affairs position.

With Debbie's position change, we do have an opening for our director of technical services position and hope to fill the opening as soon as possible. In the meantime, please direct technical and research questions to Johnny Dreyer.

And last but not least, after 35 years of loyal service with GPA, Paula Mirkin, our chapter/regional administrator, is retiring at the end of the year. We wish her the best in her retirement.

New GPA and GPSA web sites coming soon

GPA and GPSA soon will launch new web sites with a modern look and a better experience for members. Non-members interested in learning more about the associations will also find the new sites helpful and easy to navigate. Keep an eye on your inbox for information about how to navigate the new sites and find what you need.

GPA Convention registration to open next month

GPA will open online registration for the GPA Convention on Jan. 2. Along with our new GPA and GPSA web sites, we are also getting a new, custom-built membership database allowing us to use your convention registration information to automatically update your individual contact information in our system while allowing you to access your membership profile at any time. As a result, the registration process will be slightly different than in previous years, requiring each person registering to create an account using your work e-mail address. While we acknowledge that this is one extra step, you will only need to do this once. The process is simple and takes less than a minute to complete. Look for an e-mail on Jan. 2 with more information on how to create an account and register for the convention.

We look forward to seeing you in San Antonio! For more information, visit www.GPAconvention.org.

GPA to submit NFPA 56 comments

Electronic submission instructions were sent to Technical Sections A - Facilities Design & Optimization and M – Operations & Maintenance asking members to submit comments to NFPA56 - Standard for Fire and Explosion Prevention During Cleaning and Purging of Flammable Gas Piping Systems 2014 Edition.

The current NFPA 56 language includes standards that will impact GPA member companies. Scott Neil, DCP Midstream, and Brett Wheelock, ONEOK, have been working to educate the NFPA 56 committee task force members about industry-required safety measures currently in place and the difficulties additional standards will cause the industry. A report was issued resulting from the work of Neil and Wheelock, recommending the removal of gathering lines and PSM facilities from NFPA 56. GPA is encouraging member companies to take the time to support the report by submitting comments on the NFPA web site. GPA also intends to submit electronic comments as an association by the Jan. 5 filing deadline.

Ad Hoc Brazed Aluminum Heat Exchanger Committee holds first meeting

The GPA Ad Hoc Brazed Aluminum Heat Exchanger (BAHX) Committee recently met at Pioneer's offices in Irving, Texas, to discuss the development of a GPA guidance document or standard protocol for comparing common BAHX failures and solutions to minimize such failures. The committee was led by GPA's Technical Section M Chair Steve Pudlewski, Enterprise.

The group shared discussions around thermal fatigue/shocks due to differing operating conditions and process upsets. Design and the life cycle of BAHX were also discussed. Two groups were formed during the meeting and are charged with developing draft recommendations to be presented to Technical Section A – Facilities Design & Optimization and M – Operations and Maintenance during the GPA Convention in April. The Operational group will be led by Leon Rogers, Enterprise, and the Design group will be led by Nicholas Urbanski, ExxonMobil.

A conference call is scheduled for Jan. 13 at 10 a.m. Central time with operators and manufacturers to discuss the progress of the operational and design documents. If you would like to participate in the call, e-mail Debbie Beaver, dbeaver@GPAglobal.org.

GPA addresses EPA's proposed changes to emission factors for industrial flares

GPA filed comments Wednesday with the U.S. Environmental Protection Agency (EPA), recommending the agency withdraw its proposed changes to section 13.5 of AP-42, Compilation of Air Pollutant Emission Factors. GPA member companies own facilities using the AP-42 emission factors and would be subject to increased regulatory burdens under the agency's proposed substantial increase in the emission factor for nitrogen oxides emitted from industrial flares.

The GPA comments expressed concern regarding the sample size used to develop the new emission factors, which was based on only five new data points, with one value from a facility "orders of magnitude higher than the average of the other four."

GPA also noted that emission factors apply to different facility types within oil and gas operations, as well as other industry sectors, and EPA based proposed factors on flare data from one type of flare and only one type of facility in one industry sector - petroleum refineries - plus a test facility.

GPA recommended that EPA withdraw all proposed changes to AP-42 Section 13.5, keep the existing factors and determine new industrial flare emission factors using data from multiple industry segments. In addition, GPA asked the agency to consider determining separate factors for different flare types, feed composition and industrial applications prior to making any changes to the emission factors.

GPA files National Pipeline Mapping System data collection comments

GPA filed comments on Dec. 1 in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) proposal to significantly expand the information collected from operators through the National Pipeline Mapping System. GPA says the proposed new, expanded requirements for detailed information place a significant burden on its member companies with minimal benefits.

PHMSA's notice of proposed rulemaking published on July 30 said collecting additional data will help improve public safety, protect the environment and ensure infrastructure is well-maintained, while also helping emergency responders and government officials create improved emergency response plans.

GPA acknowledged that it shares PHMSA's goals and that data, if collected consistently and accurately, can assist with risk management and improve safety.

GPA provided a chart illustrating each attribute requested in the proposal and whether providing the attribute information would accomplish PHMSA's outlined goals. Of the 28 attributes requested, the chart showed that only three would assist with improved emergency response, with another five items relating to location being only potentially helpful. It also showed that information requested on 16 items is already being provided to PHMSA through other reporting requirements.

GPA comments also addressed security issues tied to compiling the requested information in a single location, saying it "raises exponentially the ability to obtain the information for purposes other than the intended use."

GPA said there must be systems in place to guarantee the security of the sensitive information being provided to PHMSA, and such system must be "thoroughly vetted, tested, and actively reviewed by industry to ensure that such information is indeed secured and remains secure in the future."

GPA also noted that the notice expands data collection requirements to facilities outside of PHMSA's jurisdiction. To address emergency preparedness, GPA said simply providing additional detail on maps or information related to pipeline operations won't be effective.

GPA opposes proposed changes to natural gas operating day

GPA filed comments with the Federal Energy Regulatory Commission (FERC) in late November, supporting the commission's efforts to increase coordination between the natural gas and electric industries but opposing the proposed change to the start of the natural gas operating day (gas day).

FERC issued a notice of proposed rulemaking in late March, proposing to amend FERC Regulation 284.12. The proposed changes include moving the start of the gas day from 9 a.m. (Central time zone) to 4 a.m., which GPA says will negatively impact operational and commercial areas of companies in the midstream energy sector.

In its comments, GPA urged the commission to evaluate evidence of the risks to both safety and reliable service. FERC's proposal would also impact midstream companies' commercial operations, requiring changes to literally thousands of contracts.

GPA encouraged the commission to gather more data before implementing a change to the start of the gas day.

Environmental Excellence Award applications due Jan. 30

The GPA Environmental Excellence Award is a project-based award that acknowledges and honors companies' achievements in energy conservation and environmental support. The nomination process is open for companies to be considered for the 2014 award recognition at the GPA Convention, April 12 - 15, 2015, in San Antonio, Texas. There, award winners will be able to display their projects so that other member companies may benefit from this knowledge and information.

The winner of each division will receive a traveling trophy (Stanley Cup style) to display at its site for one year and will have the opportunity to present the trophy to the following year's winner at the GPA Convention. Winners in both divisions will also receive a plaque as a keepsake and will have the opportunity to purchase additional plaques.

The application deadline is January 30, 2015. View details and download the application form at www.GPAglobal.org.

GPA attends ASTM winter meeting

GPA staff recently attended the ASTM D02-H – Liquefied Petroleum Gas Committee meeting, joining about 100 industry professionals in attendance. The scope of Subcommittee H was modified to delete reference to "natural gasoline" because natural gasoline more directly relates to Subcommittee A on fuels for spark-ignition engines (D02-A - Gasoline and Oxygenated Fuels). GPA's technical director gave a liaison report to the committee about GPA's technical activities.

GPA Technical Section B – Analysis & Test Methods will be reviewing ASTM Standard D2597-2010 - Test Method for Analysis of Demethanized Hydrocarbon Liquid Mixtures Containing Nitrogen and Carbon Dioxide by Gas Chromatography. After review Section B will advise D02-H whether the standard should be revised or reaffirmed without revisions.

During the D02-H meeting, the Natural Propane Gas Association (NPGA) presented a proposal for a new blend of HD-5 propane that would expand volumes available for current markets. GPA agreed to review the proposed specification within Technical Section C – Product Specifications and GPA's Technical Committee. Based on the review of the proposed specification, an ad hoc committee of volunteers from GPA and NPGA may be formed to pursue the proposal.

Technical Section F - Research fall meeting recap

GPA Research Subgroups 1 & 2 recently met in Golden, Colo. The groups reviewed research project status reports and proposed three new projects for the 2016 budget cycle:

Project 161: MeOH VLE in EG, TEG and MDEA – Methanol Vapor Liquid Equilibrium in Glycols and Amines - this is an extension of RR-177 and RR-184 and will address mass balance issue. The project will allow for better data for environmental emissions, provide new figures for the GPSA Data Book and impact product specifications.

Project 162: NGL and Propane Treating Data – Mutual Solubility of Hydrocarbon and Amines - the preliminary scope will include:

- 1. Hydrocarbons with a focus on single hydrocarbons + 1 mixture
- 2. Amines with a focus on loaded amines (MEA, DEA, DGA, MDEA)
- 3. Contaminants (CO₂, H₂S, COS, MeHS)
- 4. Experimental conditions to focus on expanding T-29 conditions (typical Y-Grade treating pressures)

Project 163: State of Art Survey for Heavy Hydrocarbon Removal and Disposition – this project is to understand which technologies are commercially available for heavy hydrocarbon (HHC) removal/recovery from natural gas.

GPA/GPSA Calendar

January

14 Houston GPA Luncheon