

USA Environmental Protection Agency Greenhouse Gas Reporting Mandate

Update

On October 26, 2009 Fluid Components (FCI), along with major landfill owners and other stakeholders in the solid waste industry, met with representatives from the USEPA Climate Change division to obtain clarifications to the mandate, specifically landfill gas subsection (HH). The purpose of the meeting was to resolve confusion about flow meters and gas composition sensors specified in the mandate.

While the language in the mandate is open-ended to allow the use of best available technology and by its intent encourage it, section 98.344 created confusion. For flow meters, section 98.344 states the calibration requirement can be met by following the manufacturers' recommendation. However, following this statement is a limited list of technologies that does not list thermal dispersion, the technology deployed in more than 90% of landfill gas applications. While there is no wording that excludes thermal dispersion technology flow meters, the fact that it is not listed was a point of confusion for affected users. The USEPA staff was asked if the rule allows the use of thermal dispersion flow meters and the answer was a resounding yes.

A summary of the meeting discussion on flow meters is below. This summary has been confirmed by EPA staff member and meeting attendee, Ms. Rachel Schmeltz, in an e-mail dated November 18, 2009.

"You confirmed that a thermal mass flow meter, capable of measuring flow rate within an accuracy of $\pm 5\%$ of full scale, when operated as specified by the manufacturer is compliant with the rule requirements. In addition, you confirmed that the list of eight options for monitoring landfill gas under section 98.344 are not exclusive. Meeting participants confirmed that two ASME methods for thermal mass flow meters are under development and an ISO standard [ISO 14511:2001(E), 2001] is available."

It is not known exactly when or what documentation the USEPA will issue, but FCI was approved to inform customers that FCI thermal flow meters can be used for the gas flow measurements required by the Mandatory Greenhouse Gas Reporting rule.

FCI is committed to continuing to be the leading provider of flow meters to the landfill gas industry and will continue to work with customers to provide the best available product solutions and support.