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| **For:** | Marie Johnson  Specialist, Air Emissions | **Date:** | February 5, 2021 |
| **By:** | Jan Gorski  Senior analyst |  |  |
| **Re:** | Draft Application Checklist for Alternative Fugitive Emission Management Programs in BC | | |

Thank you for the opportunity to provide feedback on the draft Application Checklist for Alternative Fugitive Emission Management Programs in BC. Overall, the checklist is thorough. Our recommendation is that in addition to fugitives, evaluation of alternative LDAR programs consider the potential secondary benefits of these programs and their potential interaction with other parts of the methane regulations:

* Can the program provide more accurate quantification?
* Will the program improve our understanding of methane emissions overall and contribute to a more complete inventory?
* Can the alternative program detect sources of emissions that aren’t fugitives?
* If the program can detect sources other than fugitives (namely venting):
  + Are these sources likely to have been detected otherwise?
  + Are these sources out of compliance with other parts of the regulation?

We recommend collecting additional information on whether vented emissions sources were detected and reduced during the surveys and if so, details about these emissions sources:

* Under “performance data”
  + Can the alternate program detect vented emissions?
  + If so, what types of vented emissions sources can, and can’t it detect?
* Under “fugitive emissions reduction assessment”
  + Comparison of total emissions detected (not just reduced) between traditional LDAR and alternative program.
  + Classification of all emissions sources detected and mitigated using the program by fugitive, vent (and type of vent), or unknown where possible.
  + For vented emissions detected, are they in compliance with other parts of the regulation?