

# Kurz is Approved for the Alternative Measurement Protocols for Biogas and Renewable Natural Gas

This Renewable Fuel Standard requires that biogas and renewable natural gas used to produce renewable fuels be measured using methods specified in the regulations at 40 CFR 80.155(a)(1) or (2). Parties may seek EPA approval for an alternative measurement method by submitting an alternative measurement protocol under 40 CFR 80.155(a)(3). Biogas and RNG producers may rely on these approved alternative measurement protocols (AMP) by submitting the relevant information as part of their registration submissions under 40 CFR 80.135(c) or (d), as applicable.

Kurz instruments submitted such an AMP and was approved July 10<sup>th</sup> 2024. Below is a link to the Kurz Instruments approved alternative measurement protocol under the RFS program.

<https://www.epa.gov/system/files/documents/2024-07/amp-kurz-thermal-mass-flow-meter-response-ltr-2024-07-10.pdf>

It is important to understand that the EPA approved both the 454FTB-WGF and the 454FTB under 40 CFR 80.155(a)(3) without a clear distinction between dry and wet gas flow. They did however state that the installation of these meters must be compliant with the Kurz Alternative Measurement Protocol submittal dated 03-21-2024. That request distinguished between wet and dry gas. The Kurz FTB-WGF models can be used for all biogas and RNG environments, wet and dry. The Kurz FTB models can be used for dry biogas and RNG environment only.

In summary, to meet the requirements of the approved Alternative Measurement Protocol the following must be adhered to:

- The Kurz line of WGF (Wet Gas Flow) Models can be used in condensing gas and dry gas processes. (i.e. 454FTB-WGF).
- The Kurz Line of FTB (Flow Transmitters B-Series) Models can be used for dry gas processes only (i.e. 454FTB)