



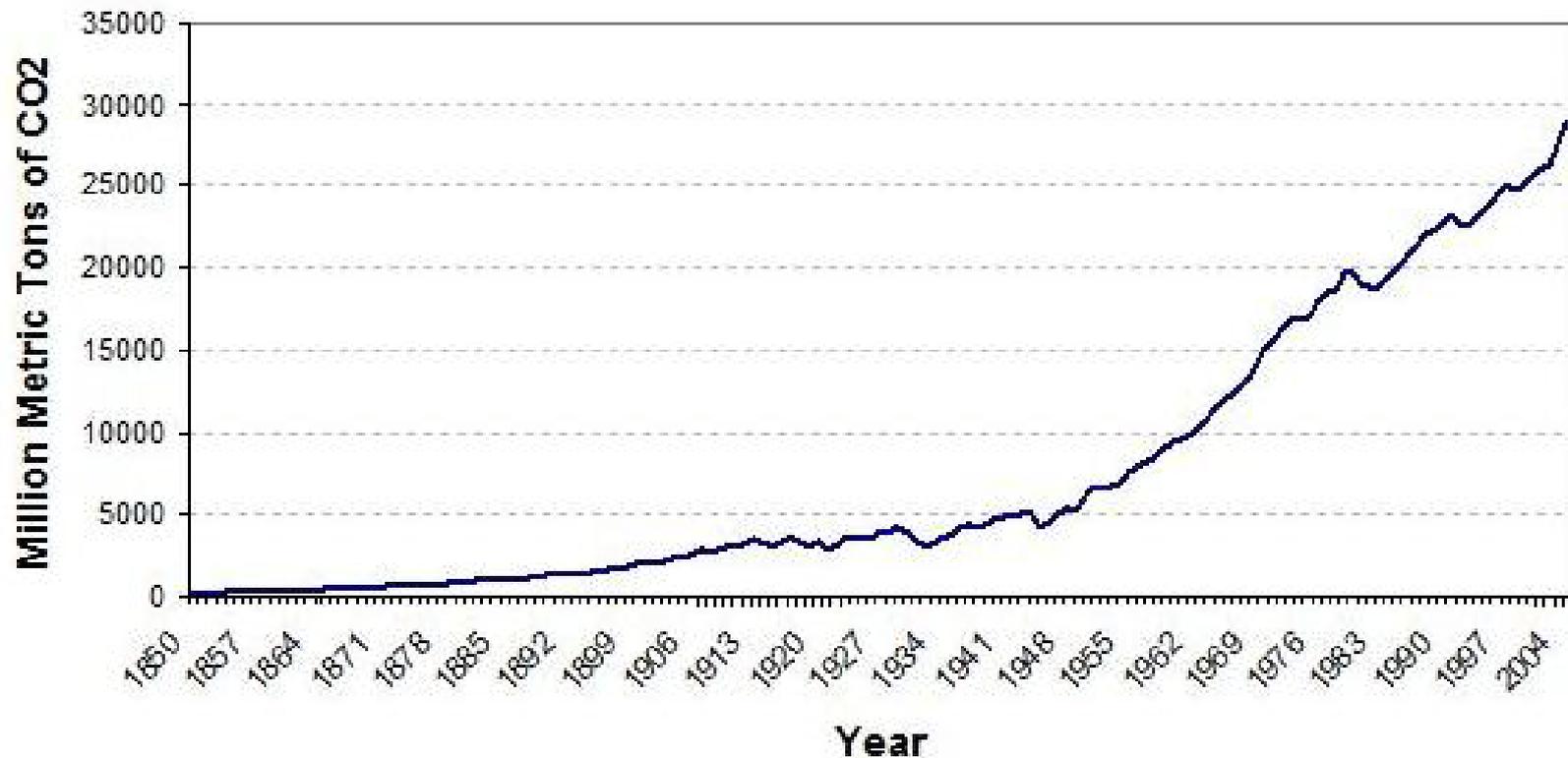
• August 15-18, 2010 • Dallas, Texas •
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EPA's Greenhouse Gas Reporting Program

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Historical Global CO₂ Emissions* (1850-2004)



*from Fuel Burning, Cement Manufacture, and Gas Flaring

Source: Marland et. al (2007) Global, Regional, and National CO₂ Emissions. In Trends: A Compendium of Data on Global Change. CDIAC U.S.A.

National Greenhouse Gas Reporting Program

- Background
- National Greenhouse Gas Reporting Rule took effect January 1, 2010
- Requires reporting of greenhouse gas (GHG) emissions from all sectors of the economy in the United States
- Provides accurate and timely data to inform future climate change policies and programs



• Does not require control of GHG

GovEnergy 2010

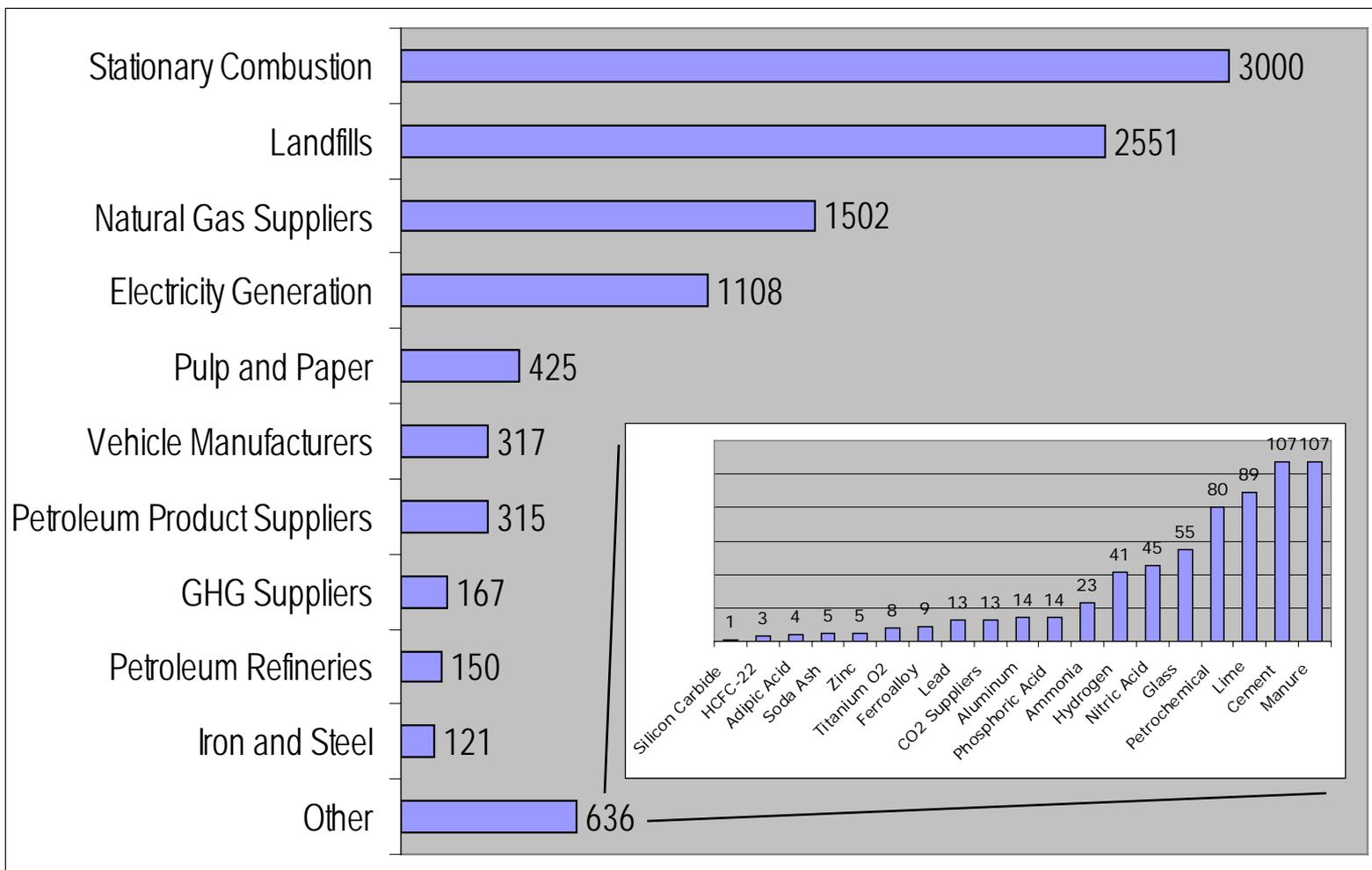
What GHGs are Reported?

- CO₂
- CH₄ (methane)
- N₂O (nitrous oxide)
- Fluorinated GHGs
 - HFCs (hydrofluorocarbons)
 - PFCs (perfluorocarbons)
 - SF₆ (sulfur hexafluoride)
 - Other fluorinated gases

Key Elements of the Rule

- Annual reporting of GHG by:
 - 25 source categories
 - 5 types of suppliers of fuel and industrial GHG
 - Motor vehicle and engine suppliers (except light duty sector)
- 25,000 metric tons CO₂e per year reporting threshold for most sources; capacity-based thresholds where feasible
- Monitoring begins January 1, 2010; first reports due March 31, 2011

About 10,000 U.S. Facilities Covered



All-in Source Categories

Electricity Generation if report CO₂ year-round through Part 75

Adipic Acid Production

Aluminum Production

Ammonia Manufacturing

Cement Production

HCFC-22 Production

HFC-23 Destruction Processes that are not collocated with a HCFC-22 production facility and that destroy more than 2.14 metric tons of HFC-23 per year

Lime Manufacturing

Nitric Acid Production

Petrochemical Production

Petroleum Refineries

Phosphoric Acid Production

Silicon Carbide Production

Soda Ash Production

Titanium Dioxide Production

Municipal Solid Waste Landfills that generate CH₄ equivalent to 25,000 metric tons CO₂e or more per year

Manure Management Systems that emit 25,000 metric tons CO₂e or more per year

[Note: EPA will not be implementing subpart JJ of the Mandatory GHG Reporting Rule using funds provided in its FY2010 appropriations due to a Congressional restriction prohibiting the expenditure of funds for this purpose.]



*Source categories are defined in each subpart.

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Threshold Source Categories

Stationary Combustion
Units

Ferroalloy Production

Glass Production

Hydrogen Production

Iron and Steel
Production

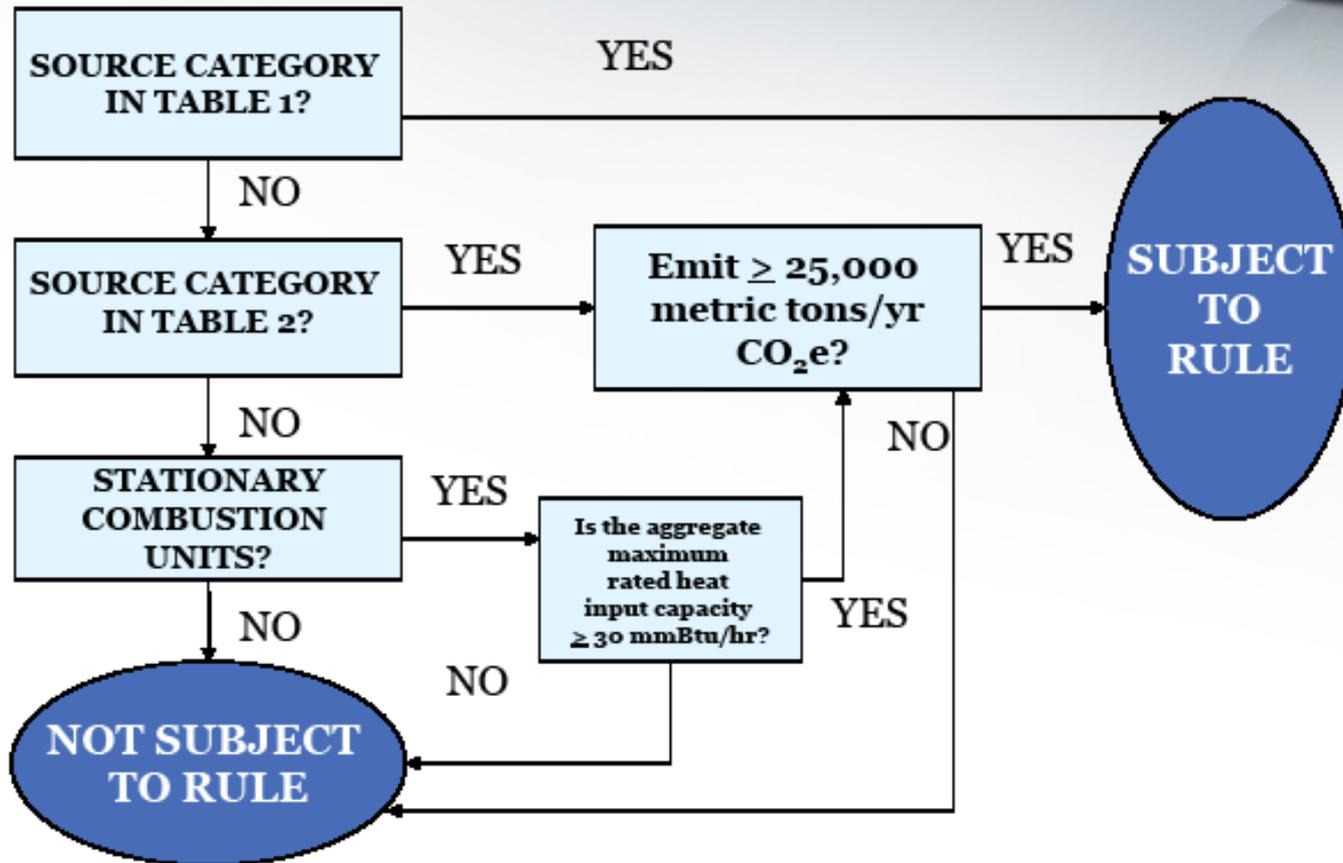
Lead Production

Pulp and Paper
Manufacturing

Zinc Production

Note: Report if emissions are $\geq 25,000$ metric tons CO₂e per year from all source categories, combustion units, and miscellaneous use of carbonates.

Does the Rule Apply to My Facility?



Source Categories Not Included in the Original, Final Rule

EPA planned to further review public comments and other information before deciding on these subparts; all outstanding categories have now been addressed in 2010:

- Electronics manufacturing
- Ethanol production
- Fluorinated GHG production
- Food processing
- Magnesium production
- Oil and natural gas systems
- Sulfur hexafluoride (SF₆) from electrical equipment
- Underground coal mines
- Industrial landfills
- Wastewater treatment
- Suppliers of coal
- Geologic sequestration

Facilities with these source categories could be covered by the rule based on GHG emissions from stationary fuel combustion sources.

Schedule for data collection and reporting

- **1/1/10** Start collecting data using required methods in each subpart or best available monitoring methods
- **1/28/10 (30 days after rule effective date)**
Deadline for submitting application to extend use of best available monitoring methods
- **3/31/10** Monitors installed and calibrated.
Begin using required monitoring methods (if extension for best available methods not obtained)
- **12/31/10** Complete 2010 data collection
- **1/30/11** Submit certificate of representation
- **3/31/11** Submit GHG report for 2010
- **Ongoing** Submit corrected report 45 days after each discovery
- **Ongoing** Submit annual reports on 3/31 each year

When Can I Stop Annual Reporting?



- If annual reports demonstrate CO₂e <25,000 metric tons/yr for 5 consecutive years.
- If annual reports demonstrate CO₂e <15,000 metric tons/yr for 3 consecutive years.
- If you shut down all processes/units/supply operations covered by the rule.

Additional Sources of Fluorinated GHGs – proposed March 22, 2010

– Proposal Covers:

- Supplementary Proposal: Clarification of the term “electric power system” (**subpart DD**)

New Proposal:

- Imports and exports F-GHGs inside pre-charged equipment and closed-cell foams (**subpart QQ**)
- Manufacturers of electrical equipment (**subpart SS**)
- Re-proposal:
 - Emissions from fluorinated gas production (**subpart L**)
 - Manufacture of electronics (**subpart I**)

Subpart RR: Carbon Dioxide Injection and Geologic Sequestration Reporting – proposed March 22, 2010

- Reports would be submitted annually with the first reports due to EPA in 2012 for CO₂ injected during 2011.
- Geologic sequestration facilities would be required to add data to their annual reports on the amount of CO₂ that is geologically sequestered once their monitoring, reporting and verification (MRV) plans are implemented.

Subpart W: Petroleum and Natural Gas Systems – proposed March 22, 2010

- Would require reporting by facilities in specific segments of the petroleum and natural gas industry that emit GHGs greater than or equal to 25,000 metric tons CO₂e per year:
- ***Onshore petroleum and gas production (including enhanced oil recovery CO₂ surface emissions), basin level reporting***
- Offshore petroleum and gas production platforms
- Natural gas processing plants
- Natural gas transmission compression facilities
- Underground natural gas storage facilities
- Liquefied natural gas (LNG) storage facilities
- LNG import and export facilities
- ***Natural gas distribution facilities, owned or operated by Local Distribution Companies (LDCs)***

Bold italic notes: new facilities, not included in initial oil and gas systems proposal

May 27, 2010, and July 20, 2010, Proposed Revisions

- May 27: Proposes technical corrections and some amendments to 18 of the subparts
- July 20: Proposed clarification, provisions in working with affected sources during rule implementation and outreach, and corrections to terms, definitions in equations and other technical corrections

June 28, 2010, final rule

- On June 28, 2010, Administrator Jackson signed the final rule for:
 - Magnesium Production
 - Underground Coal Mines
 - Industrial Wastewater Treatment
 - Industrial Waste Landfills
- This action also states EPA's final decisions:
 - not to include ethanol production and food processing as distinct subparts in the GHG Reporting Program under Part 98
 - not to include suppliers of coal in Part 98 at this time.
- The June 28 final rule means that all outstanding source categories for the GHG reporting program have been addressed.

Reporters and Emissions Expected to be Covered

Source	No. of Reporters Expected	Emissions Covered mmtCO ₂ e	% of industry
• Underground Coal Mines (CH ₄)	114	33.8	86%
• Magnesium Production (SF ₆)	11	2.9	92%
• Industrial Landfills (CH ₄)	200*	13.7	89%
• Industrial Wastewater (CH ₄)	358*	6.9	81%
Total	680	57.3	

* The majority of these sources are already required to report under other subparts.

A facility is defined as...

- Physical property, plant, building, structure, source, or stationary equipment;
 - on contiguous or adjacent properties;
 - in actual physical contact or separated solely by public roadway or other public right of way; and
 - under common ownership or common control
-
- Military installations may be classified as more than one facility.

Facility issues...

- **Question:**
- *I leased space within my definition of “facility”, if I do not track fuel use for that space, do I have to include it in my report?*
- **Answer:**
- The answer depends on who owns and operates the emitting equipment. Keep in mind that the “facility” is the emitting equipment not the property. If you own and operate the emitting equipment, then it must be included in the report (e.g., you lease a building and install a combustion unit). If you do not own or operate the equipment (e.g., hot water heaters or furnaces that come with the building) but just pay the fuel bill, then emissions from the equipment are not included.

Facility Issues...

- **Question:**
- *If a campus is divided by several blocks of property not owned by the entity –can that area be defined as a facility by itself?*
- **Answer:**
- If the campus is separated as described, the campus would be defined as two facilities, because the properties are not contiguous or adjacent (i.e., not in actual physical contact) or separated solely by a roadway or other public right-of-way.

Facility issues...

- *Question:*
- *If a campus is divided by a non-owned body of water, does that create two distinct facilities?*
- *Answer:*
- No. Separation by a public right-of-way (e.g., a road or river) does not break the continuity of the property that is under common ownership or control.

Facility issues...

- **Question:**
- *I bought/sold a building within a calendar year, how do I account for that?*
- **Answer:**
 - The company that owns or operates the facility at the end of the reporting year will be responsible for reporting, and the annual emissions report must cover emissions for the entire calendar year. In the event a university adds or reduces emissions by way of acquiring or selling property with sources, the net effect should be reflected in the annual emissions report.
 - If total emissions are reduced below the 25,000 ton/year threshold by way of selling a property with sources, the university may cease reporting if reported emissions are less than 25,000 tons/year for five consecutive years, less than 15,000 for three consecutive years, or if all GHG-emitting processes cease to operate.
 - Regarding the reporting threshold, change of ownership does not affect a facility's status with respect to reporting threshold. Applicability to the 25,000 ton/year threshold is determined based on annual emissions from the “facility” as defined in the rule.

Facility issues...

- **Question:**
- *I have space which I own, but lease to a third party within my “facility” and the tenant pays the utilities, do I have to include that building space in my report?*
- **Answer:**
- It depends on who owns and operates the emitting equipment.
 - If you own the equipment (e.g., furnaces, hot water heaters, incinerators), then you must include the equipment in your report. Even if the tenant pays the fuel bills, you must report the emissions.
 - If the tenant leases space and installs and operates emitting equipment, then the equipment is not part of your facility.

Electronic GHG Reporting Tool (e-GGRT)

- A new web-based system EPA is developing to support reporting under the Greenhouse Gas Reporting Program (GHGRP).
- http://www.epa.gov/climatechange/emissions/e-ggrrt_faq.html
- The e-GGRT registration module will be available in late summer 2010 in anticipation of reporting deadlines in 2011.
- e-GGRT will guide facilities and suppliers through registration and emissions reporting using step-by-step web forms.
- Some reporters may choose to format their annual emissions report according to the [e-GGRT Extensible Markup Language \(XML\) reporting schema](#) and submit information via bulk file upload.
- You must register online to become an e-GGRT user.
- Upon completion of the user registration process, e-GGRT will allow you to register facilities and suppliers and submit Certificates of Representation to EPA.
- Some caveats:
 - Suppliers of Coal-based Liquid Fuels (subpart LL) and Suppliers of Petroleum Products (subpart MM) will use DCFUELS
 - CAMD Business System and ECMPS (part 75)
 - EPA is coordinating with states on the development of reporting and exchange schemas for the GHGRP

Confidentiality Determination

- On June 28, 2010: Administrator Jackson signed the Proposed Confidentiality Determination Specifying Procedures for Handling Part 98 Data.
- Proposes to determine which data elements to be reported under EPA's Greenhouse Gas Reporting Program would be publicly available and which would be kept confidential.
- 60 day public comment period, after publication in the Federal Register.
- Would allow EPA to release or withhold as CBI data elements reported under the GHGRP according to the final confidentiality determinations.
- Amendment would apply only to GHGRP data.

- The CAA precludes “emission data” from being considered confidential and requires that such data be available to the public.
- Each category is given one of the following proposed determinations:
 - 1. Meets definition of “emissions data” and therefore shall be available to the public under CAA sec 114(c) CBI determination is not necessary
 - For data elements that are not “emission data”:
 - 2. Not CBI because data is:
 - Not likely to cause substantial harm to business’s competitive position (40 CFR 2.208)
 - 3. CBI
 - Entitled to confidential treatment unless subsequently determined to be emission data or otherwise not qualified as CBI

EPA assistance for State-EPA GHG reporting communication

- \$2 million in funds was available for eligible entities (RFP closed August 9, 2010)
 - to communicate to affected facilities the requirements of state greenhouse gas (GHG) reporting systems as compared to those of U.S. EPA's Final Mandatory Reporting of Greenhouse Gases Rule (MRR)
 - to identify options for how the data collected through state reporting requirements and the MRR may be used to facilitate state- and facility-based greenhouse gas programs.
- EPA anticipates awarding up to 20 assistance agreements from this announcement, subject to availability of funds and the quality of proposals received
- Eligible entities:
 - States, local governments, territories, Indian Tribes, and possessions of the U.S., including the District of Columbia
 - international organizations, public and private universities and colleges
 - hospitals, laboratories, other public or private non-profit institutions

For more information

- Go to www.epa.gov/climatechange/emissions/ghgrulemaking.html
 - Preamble and rule
 - Technical support documents on source categories
 - Comment response documents
 - Link to rulemaking docket
 - Technical assistance materials
- FAQ data base-search tool:
http://www.epa.gov/climatechange/emissions/ghg_faq.html
- Hotline: email GHGMRR@epa.gov