

US EPA Greenhouse Gas Reporting Program: Proposed Revisions to Reporting and Recordkeeping Requirements, and Proposed Confidentiality Determinations

US EPA
Webinar
October 28, 2013



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Overview



- **Background on Greenhouse Gas Reporting Program & Proposed Rule**
- **Proposal: Key Provisions**
- **Comment Period**

Background (1 of 2)



- The Greenhouse Gas Reporting Program (GHGRP) collects greenhouse gas data from 41 source categories and currently has several years of data from these sources, including reports from more than 8,000 direct emitters and suppliers of greenhouse gases (GHGs).
- Generally, a facility that meets the emissions threshold of 25,000 or more metric tons CO₂e per year reports to the program.

Background (2 of 2)



- In July 2010, EPA proposed confidentiality determinations for the data required to be reported for most source categories of the GHGRP.
 - EPA proposed that inputs to emission equations are emission data.
 - The Clean Air Act precludes “emission data” from being treated as confidential.
- EPA received comments to the proposal indicating significant stakeholder concerns regarding potential release of these data.
- In response to these comments, EPA deferred the reporting deadline for inputs to emission equations to allow time to fully evaluate the concerns regarding the potential release of these data and to address such concerns as appropriate.

Proposal: Key Provisions (1 of 2)



- The EPA completed its evaluation of the “inputs to equations” for which the reporting deadline was deferred until March 31, 2015.
- Where the Agency identified disclosure concerns, the EPA is proposing alternative recordkeeping and reporting requirements and verification procedures.
- These proposed changes build on the EPA’s experience and success with electronic reporting and verification during the first three years of the GHGRP.

Proposal: Key Provisions (2 of 2)



- Reporting requirements for “inputs to equations” for which disclosure concerns were not identified (and would still be useful to the EPA) are not proposed to be amended in this action.
 - Specified sources in Subpart C (General Stationary Fuel Combustion Sources) connected to certain electric generators connected and able to deliver power to the local or regional power grid.
 - Subpart W (Petroleum & Natural Gas Systems).
 - Subpart II (Industrial Waste Water Treatment).
 - Various “inputs to equations” in other subparts covered by proposed rule.
- For these “inputs to equations,” the deferral would expire in March 2015, and the EPA would collect these data for reporting years 2010 (as applicable), 2011, 2012, 2013, and 2014 by March 31, 2015.

Proposed Alternative Verification

Approach



- For subparts with “inputs to equations” with disclosure concerns, EPA is proposing an enhanced verification approach starting in RY 2014:
 - Use of software, Inputs Verification Tool, deployed within e-GGRT. Reporters would be required to enter “inputs to equations” into Tool. Tool calculates GHG emissions and conducts verification checks on “inputs to equations” without these “inputs to equations” being reported to EPA.
 - 26 new data reporting elements added for verification and informing policy.
 - Record retention time extended from current requirement of 3 years to 5 years (for all subparts reported by facility) and “inputs to equations” must be kept in format generated by software.

Proposed Inputs Verification Tool



- For the subparts where use of the Inputs Verification Tool would be required, the tool would generate a verification summary.
- The verification summary would be accessible to the EPA once the annual report is submitted.
- The verification summary would indicate to the EPA whether the reported GHG values are different from the GHG values calculated by the Inputs Verification Tool, based on the “inputs to equations.”
- EPA developed a pilot Inputs Verification Tool for one subpart, Petrochemical Production (subpart X). The pilot demonstrates how the tool would function within e-GGRT as well as the types of verification checks that would be conducted.
- To access the pilot:
<http://www.epa.gov/ghgreporting/reporters/training/rulepilot.html>

Proposal: Source Categories Required to Use Inputs Verification Tool

C—General Stationary Fuel Combustion Sources, excluding specified sources connected to certain electric generators connected and able to deliver power to the local or regional power grid	S—Lime Manufacturing
E—Adipic Acid Production	U—Miscellaneous Uses of Carbonate
F—Aluminum Production	V—Nitric Acid Production
G—Ammonia Manufacturing	X—Petrochemical Production
H—Cement Production	Y—Petroleum Refineries
K—Ferroalloy Production	Z—Phosphoric Acid Production
L—Fluorinated Gas Production	AA—Pulp and Paper Manufacturing
N—Glass Production	BB—Silicon Carbide Production
O—HCFC-22 Production and HFC-23 Destruction	CC—Soda Ash Manufacturing
P—Hydrogen Production	EE—Titanium Dioxide Production
Q—Iron and Steel Production	GG—Zinc Production
R—Lead Production	TT—Industrial Waste Landfills

Note that the Inputs Verification Tool would not be required to be used by reporters for GHGs for which the reporter uses a CEMS.

Comment Period & Additional Information



- Comment period is open until November 12, 2013.
- Submit your comments, identified by Docket ID No. EPA–HQ–OAR–2010–0929, by one of the following methods:
 - *Federal eRulemaking Portal: <http://www.regulations.gov>. Follow the online instructions for submitting comments.*
 - *Email: GHGReportingCBI@epa.gov.*
 - *Fax: (202) 566–1741.*
 - *Mail: Environmental Protection Agency, EPA Docket Center (EPA/DC), Mailcode 6102T, Attention Docket ID No. EPA–HQ–OAR–2010–0929, 1200 Pennsylvania Avenue NW., Washington, DC 20460.*
 - *Hand Delivery: EPA Docket Center, Public Reading Room, William Jefferson Clinton Building West, Room 3334, 1301 Constitution Avenue NW., Washington, DC 20004.*
- For additional information on proposal:
<http://www.epa.gov/ghgreporting/reporters/cbi/index.html>