

**Mandatory Reporting of Greenhouse Gases (40 CFR Part 98)
Extension of Use of Best Available Monitoring Methods (BAMM) for Subparts P
(Hydrogen Production), X (Petrochemical Production), and Y (Petroleum Refineries)**

Frequently Asked Questions

1. How and where do I file my initial notification of intent to submit an extension request?

Answer: You must file an initial notification of intent to submit an extension request no later than January 1, 2011, or by the end of the approved use of best available monitoring methods extension in 2010, whichever is earlier. This filing should include a statement that installation of the measurement device(s) is for unit(s) that operate continuously and for which installation will require a hot tap or process equipment or unit shutdown.

Effective immediately, any future Best Available Monitoring Method (BAMM) requests must be submitted in hard copy to one of the following addresses:

For package delivery (Preferred): Carole Cook, c/o Director, Climate Change Division, U.S. Environmental Protection Agency, 1310 L Street, NW, 802e, Washington, DC 20005. Phone: 202-343-9263

For U.S. mail: Carole Cook, c/o Director, Climate Change Division, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Mail Code: 6207J, Washington, DC 20460

2. Does the initial notification of intent to submit an extension request need to be submitted by a designated representative? How about the complete extension request?

Answer: The initial notification of intent submitted by January 1, 2011 does not have to be submitted by a Designated Representative (DR).

The complete extension request must be submitted by the DR, the ADR or an agent delegated responsibility for submissions in accordance with §98.4.

3. My current best available monitoring method (BAMM) extension expires December 31, 2010. I plan to file a BAMM extension request as specified in §98.3(j). Should I continue to use my current method until I receive a decision from EPA? Will I be out of compliance during the time that EPA reviews my extension request?

Answer: Any owner or operator that notifies EPA of its plan to apply for BAMM for measurement device installation by January 1, 2011, and submits a full extension request by February 15, 2011, can automatically use BAMM consistent with their request through June 30, 2011, even if EPA ultimately disapproves the request to use BAMM beyond June 30, 2011.

4. How and where do I file my complete extension request?

Answer: Your complete extension request must include the information listed in §98.3(j)(4). EPA intends to provide an optional form which you may use to submit your complete extension request. When available, the *Optional Facility Form For Requesting an Extension*

of Use of Best Available Monitoring Methods for Subparts P (Hydrogen Production), X (Petrochemical Production), and Y (Petroleum Refineries) will be accessible at EPA's Web site (www.epa.gov/climatechange/emissions/ghgrulemaking.html).

You must submit your request by February 15, 2011. Effective immediately, any future Best Available Monitoring Method (BAMM) requests must be submitted in hard copy to one of the following addresses:

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If mailed, the extension request must be received no later than February 15, 2010.

5. If my next shutdown is not planned to occur until after December 31, 2013, how should I proceed? Can I submit my re-application for a BAMM extension beyond December 31, 2013 now? If not, when should I submit my re-application?

Answer: If your next planned shutdown is currently scheduled for after December 31, 2013, you should list the planned shutdown date in your BAMM extension request submitted in 2011; however, EPA will not approve a BAMM extension request beyond December 31, 2013 at this time. If in 2013 you still determine the need for a BAMM extension beyond December 31, 2013, you may re-apply to use BAMM for an additional two years. The new extension request must be submitted by June 1, 2013.

6. My next planned shutdown is scheduled after December 31, 2015. How can I proceed and be in compliance?

Answer: If your next planned shutdown is currently scheduled for after December 31, 2013, you should list the planned shutdown date in your BAMM extension request submitted in 2011; however, EPA will not approve a BAMM extension beyond December 31, 2013 at this time. If in 2013 you still determine the need for a BAMM extension beyond December 31, 2013, you may re-apply to use BAMM for an additional two years, but no later than December 31, 2015.

7. Can I initiate a BAMM extension request under §98.3(j) for process equipment or a unit for which I did not submit a 2010 BAMM extension request?

Answer: Yes, however if that equipment or unit was required to have measurement devices installed in 2010, receiving a BAMM extension for 2011 or beyond would not relieve you of liability for failure to install and use that equipment during 2010.

8. I would like to apply for a BAMM extension for a reason other than those listed in §98.3(j)(1) (such as a monitoring equipment purchase delay). Can I do so under §98.3(j)?

Answer: No. §98.3(j) applies only to the limited circumstances defined in §98.3(j)(1).

- 9. My facility is subject to subpart P and/or subpart X and subpart Y and I have a unit that operates continuously and would require a unit shutdown in order to install equipment, therefore it meets the criteria in §98.3(j)(1). However, the unit in question is subject to the requirements of subpart C, not P (X or Y). Can I still apply for an extension request for this unit?**

Answer: Yes. As long as you meet the requirements of §98.3(j)(1), specifically, you are an owner or operator required to report under subpart P, subpart X or subpart Y of this part, your process equipment or unit operates continuously, and it is not possible to install a required flow meter or other measurement device without process equipment or unit shutdown, or through a hot tap, you may request an extension from the Administrator to delay installing the measurement device until the next scheduled process equipment or unit shutdown. This includes any units subject to subpart C or another subpart.

- 10. I have received a BMM extension request approval under §98.3(j), but am not able to install the appropriate measurement devices on the planned process equipment or unit shutdown date specified in my request. How do I submit a subsequent extension request?**

Answer: Any subsequent extensions to the original request must be submitted to the Administrator within four weeks of the owner or operator identifying the need to extend the request, but in any event no later than four weeks before the date for the planned process equipment or unit shutdown that was provided in the original request. You must certify that you are submitting the extension request within four weeks of identifying the need to extend the request and include the information listed in §98.3(j)(4).

Subsequent extension requests must be submitted by the DR, the ADR or an agent delegated responsibility for submissions. Effective immediately, any future Best Available Monitoring Method (BMM) requests must be submitted in hard copy to one of the following addresses:

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- 11. If my BMM extension request under §98.3(j)(3) is not approved by the Administrator before July 1, 2011, when must I install all required measurement devices?**

Answer: If your BMM extension request is not approved, you must install all such devices by July 1, 2011.

For More Information

This document is provided solely for informational purposes. It does not provide legal advice, have legally binding effect, or expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits in regard to any person. These FAQ's are intended to assist reporting facilities/owners in understanding key provisions of the final rule. Visit EPA's Web site (<http://www.epa.gov/climatechange/emissions/proposedrule.html>) for more information. For questions on the rule that cannot be answered through the Web site, please contact us at: GHGReporting@epa.gov.