

# **Proposed Mandatory GHG Reporting Rule: Overview**

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EPA's Proposed Rule for Mandatory Reporting for Greenhouse Gas Emissions  
ACCO Webinar Series: May 11, 2009

## **Outline**

- Congressional Request
- Rulemaking Approach
- Summary of Key Elements of Proposal
- More Information



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## Appropriations Language



### FY08 Omnibus Appropriations, signed Dec 26, 2007:

#### Accompanying Explanatory Statement

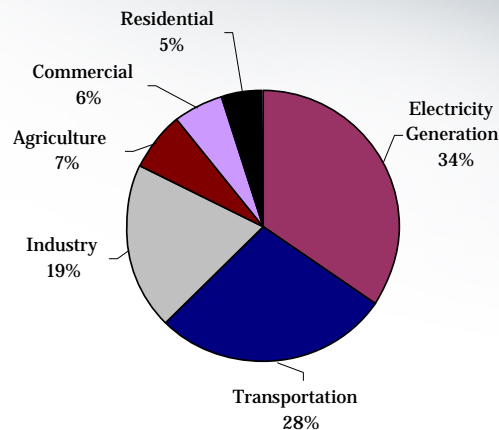
- The Agency shall "use its existing authority under the Clean Air Act" to develop a mandatory GHG reporting rule. "The Agency is further directed to include in its rule reporting of emissions resulting from upstream production and downstream sources, to the extent that the Administrator deems it appropriate. The Administrator shall determine appropriate thresholds of emissions above which reporting is required, and how frequently reports shall be submitted to EPA. The Administrator shall have discretion to use existing reporting requirements for electric generating units under Section 821 of the Clean Air Act...."

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## U.S. GHG Emissions (2007)



### Emissions (CO<sub>2</sub>e) Allocated to Economic Sectors



Source: *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2007* (April 2009)

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## Source Categories Coverage



After applying the screening criteria, EPA developed reporting methodologies for emissions source categories found at the following facilities:

Sector	Reporters
<b>Electricity Generation</b>	Power plants
<b>Transportation</b>	Vehicle and Engine Manufacturers
<b>Industrial</b>	All large industrial emitters, including those in the following industries:
<i>Metals</i>	Iron and Steel, Aluminum, Magnesium, Ferroalloy, Zinc, and Lead
<i>Minerals</i>	Cement, Lime, Glass, Silicon Carbide, Pulp and Paper
<i>Chemicals</i>	HCFC-22, Ammonia, Nitric Acid, Adipic Acid, SF6 from Electrical Equipment, Hydrogen, Petrochemicals, Titanium Dioxide, Soda Ash, Phosphoric Acid, Electronics, Titanium Dioxide
<i>Oil and Gas</i>	Components of oil and gas systems, Underground coal mining
<b>Other</b>	Landfills, Wastewater Treatment, Ethanol, Food Processing
<b>Agriculture</b>	Manure Management
<b>Upstream Suppliers*</b>	Petroleum Refineries, Gas Processors, Natural Gas Distribution Companies, Coal Mines, Importers, Industrial Gases (e.g., HFCs, N2O, PFCs, CO2)

\*Some upstream suppliers will also be reporting their direct emissions (e.g., refineries)

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## Outreach meetings held



- Meetings held with over 250 different groups including:
  - States, state- or regional-based groups: CA, CT, NM, SCAQMD, TCR, NACAA, ECOS, WCI, RGGI
  - Tribes: Tribal Air Caucus, National Tribal Air Assoc.
  - Trade Associations: Edison Electric Institute, American Chemistry Council, Portland Cement Assoc., National Petrochemical & Refiners Assoc., American Trucking Assoc., Alliance of Automobile Manufacturers, National Mining Assoc, American Farm Bureau Federation, American Forests and Paper Assoc.
  - NGOs: WRI, NRDC, Pew

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## Key Aspects of Proposal



- Who reports
- Thresholds
- Reporting methodology
- Frequency
- Verification

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## Proposal Summary



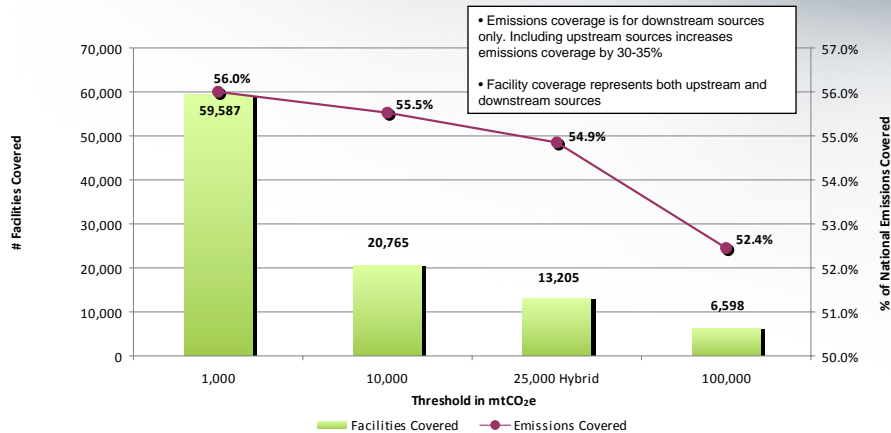
- Reporter: Hybrid approach
  - Facility based reporting for all source categories for which there are methods
  - Limited exceptions for a few reporters (e.g. fuel importers, vehicle and engine manufacturers)
- Threshold: Hybrid approach
  - A facility that meets the emissions threshold of 25,000 tons CO<sub>2</sub>e reports all source categories for which there are methods in the rule
  - May develop capacity thresholds where feasible (e.g., ARP)
- Methodology: Hybrid approach
  - Direct measurement of stationary combustion source categories where data currently collected (e.g., CO<sub>2</sub> emissions from EGUs in ARP)
  - Facility-specific calculation methods for other source categories at the facility
- Frequency: Annual
  - Annual for new reporters
  - Facilities already reporting similar data more frequently to other mandatory programs (e.g., Acid Rain Program) continue current practice
- Verification: EPA as the verifier
  - Reporter self-certifies emissions data and other specified activity data and submits to EPA who performs QA/QC of reports

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## Estimated Proposal Coverage



Downstream Facility and Emissions Coverage by Threshold



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## What is in the Rule



- Preamble
- Rule
  - 41 Subparts in Part 98
  - Amendments to existing mobile source regulations
- Regulatory Impact Analysis (RIA)
- Technical Support Documents
  - For source categories and other components (e.g. thresholds)

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## Status of Rule



- Proposed Rule published in the Federal Register April 10, 2009
- 2 Public Hearings held (April 6-7 and April 16)
- 60 day public comment period ends June 9, 2009
- First reporting year would be 2010 [except vehicle and engine manufacturers]
- Reporting period would start Jan 1 2011 – March 31 2011

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## For more information



- Preamble and proposed regulatory text available at: [www.regulations.gov](http://www.regulations.gov) Published in the Federal Register 4/10/2009
- Follow instructions for submitting comments, go to [www.regulations.gov](http://www.regulations.gov)
- Official Comment Period: 4/10/09 to 6/9/09
- Additional information:  
[www.epa.gov/climatechange/emissions/ghgrulemaking.html](http://www.epa.gov/climatechange/emissions/ghgrulemaking.html)  
Hotline: 1-877-GHG-1188  
Email: [GHGMRR@epa.gov](mailto:GHGMRR@epa.gov)

This information is intended to assist reporting facilities/owners in understanding key provisions of the proposed rule. However, this information is not intended to be a substitution for the rule.

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