



MANDATORY REPORTING OF GREENHOUSE GASES SUMMARY GENERAL PROVISIONS (SUBPART A)

Applicability Summary

EPA signed 40 CFR 98 on September 22, 2009 (along with amendments to other existing subparts), requiring the reporting of greenhouse gases (GHG) beginning March 31, 2011 for 2010 data. The rule regulates CO₂, CH₄, N₂O, and specific fluorinated hydrocarbons. To target the largest majority of GHG emitters, the following categories are required to report, except as noted:

- Electricity Generation
- Adipic Acid Production
- Aluminum Production
- Ammonia Manufacturing
- Cement Production
- Ferroalloy Production ⁽¹⁾
- Glass Production ⁽¹⁾
- HFC-22 Production and HFC-23 Destruction
- Hydrogen Production ⁽¹⁾
- Iron and Steel Production ⁽¹⁾
- Lead Production ⁽¹⁾
- Lime Manufacturing
- Miscellaneous Uses of Carbonate
- Nitric Acid Production
- Petrochemical Production
- Phosphoric Acid Production
- Pulp and Paper Manufacturing ⁽¹⁾
- Silicon Carbide Production
- Soda Ash Manufacturing
- Titanium Dioxide Production
- Zinc Production ⁽¹⁾
- Municipal Solid Waste Landfills
- Manure Management
- Stationary Fuel Combustion ⁽²⁾
- Suppliers ⁽³⁾ – such as petroleum refineries that distill crude oil, petroleum product importers and exporters, natural gas and natural gas liquids suppliers

- (1) Report if over 25,000 metric tons/yr of CO₂ equivalent (CO₂e) from stationary combustion
- (2) Report if not a listed category, >30MM Btu/hr heat input at site, and >25,000 metric tons/yr CO₂e
- (3) Report if supply applicable products for which calculation methodologies are provided in subparts KK through PP. The 25,000 metric ton/yr threshold applies to many of the products.

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GENERAL PROVISIONS (SUBPART A)

Applicability Summary (cont'd)

The following source category requirements are still under review by the EPA and are not being promulgated at this time. However, these sites will need to report under Subpart C if their aggregate combustion sources have a heat input >30 MM Btu/hr and emit $\geq 25,000$ metric tons/yr CO₂e:

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

Threshold Determination

Several of the categories in the rule have a threshold level as CO₂ equivalent. To determine if the site emits greater than the threshold, calculate the GHG emissions according to relevant methodologies in the rule, and convert all pollutants to a CO₂ equivalent (according to the rule methodology) and then total the emissions.

A site that at one time exceeded the threshold but falls below 25,000 metric tons/yr for five consecutive years, or 15,000 metric tons/yr for three consecutive years, may cease reporting but must provide adequate notification.

Monitoring and Reporting

For those sites which are required to report, the reports must be in compliance with both Subparts A and the other applicable subparts. Applicable subparts take precedence over Subpart A for any contradictory requirements.

Suppliers must report the GHG emissions based on the methodologies provided in subparts KK through PP.

The rule requires monitoring data but also allows best available monitoring methods to be used the first quarter of 2010 until relevant monitoring equipment can be put into place and operational. If for some reason the monitoring equipment can not be in place by March 2010, then an extension must be submitted within 30-days of the effective date of the rule (by ~January 2010). If extensions are granted, required monitoring equipment still must be in place and operational by January 1, 2011.

Each report is certified by a Designated Representative. There is one designated representative and that is the same person as defined in Subpart 75. Each GHG pollutant is reported as a separate pollutant plus CO₂ is reported as biogenic CO₂ and nonbiogenic CO₂. All reports are to be submitted electronically.

The site must maintain a monitoring plan which includes descriptions of the procedures and methods that are used for quality assurance, maintenance and repair of all continuous monitoring systems, flow meters, and other instrumentation used to provide data. The monitoring plan must be kept updated with production, monitoring equipment, or QA/QC changes.