

Information Sheet



Proposed Rule: 2011 Technical Corrections, Clarifying and Other Amendments to Certain Provisions of the Mandatory Reporting of Greenhouse Gases Rule

This proposed rule includes technical corrections, clarifying and other amendments to specific Greenhouse Gas Mandatory Reporting Rule provisions. In addition to some more minor technical and editorial corrections, we propose the following amendments.

Subpart A (General Provisions)

- Amend Table A-3 to set a threshold for underground coal mines to include only those that have ventilation emissions of 36,500,000 actual cubic feet (acf) of CH₄ or more per year (approximately equivalent to 100,000 acf of CH₄ or more per day).
- Add a provision to defer any deadline under the GHG Reporting Program that occurs on a weekend or a holiday to the next business day.
- Amend language to provide a one-time extension of the 2012 reporting deadline for facilities and suppliers subject to source categories for which data collection began in 2011. The extension would apply to Electronics Manufacturing (subpart I), Fluorinated Gas Production (subpart L), Magnesium Production (subpart T), Petroleum and Natural Gas Systems (subpart W), Use of Electric Transmission and Distribution Equipment (subpart DD), Underground Coal Mines (subpart FF), Industrial Wastewater Treatment (subpart II), Imports and Exports of Equipment Pre-charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed-cell Foams (subpart QQ), Geologic Sequestration of Carbon Dioxide (subpart RR), Manufacture of Electric Transmission and Distribution (subpart SS), Industrial Waste Landfills (subpart TT) and Injection of Carbon Dioxide (subpart UU).
- Amend the Best Available Monitoring Methods (BAMM) requirements to require all facilities and suppliers, including subparts promulgated in 2010, that use BAMM to provide a brief description of each “best available monitoring method” used, the parameter measured using the method, and the time period during which the “best available monitoring method” was used in the annual report.
- Amend the definition of “blowdown vent stack emissions” to ensure consistency with provisions in subpart C which exempt emissions from emergency generators and equipment from the GHG emissions calculations.
- Clarify in Table A-3 that facilities are only required to report for electrical transmission and distribution equipment use under subpart DD if the total nameplate capacity of SF₆ and PFC-containing equipment located within that facility exceeds 17,820 pounds, as elaborated in §98.301.
- Amend the definition of “supplier” to specifically refer to those source categories listed in Table A-5 to subpart A of part 98 and as described in the definition of the source category in the applicable subparts.
- Clarify that all requests, notifications, and communications to the Administrator, other than submittal of the annual GHG report, the certificate of representation, and other requests, notifications or communications that can be submitted through the electronic

greenhouse gas reporting tool (e-GGRT), shall be submitted through the mail to the Director of the Climate Change Division.

- Amend language to require owners and operators which no longer need to submit an annual GHG report because their operations have changed such that all applicable GHG-emitting processes and operations cease to operate to notify EPA by March 31 of the year following the reporting year in which such conditions have been met.
- Clarify that the 3-year requirement for retention of records starts from the date of submission of the annual GHG report for the reporting year in which the record was generated.

Subpart W (Petroleum and Natural Gas)

- Clarify the definition for "gas well" to state that it includes those wells that produce condensate in association with natural gas.
- Clarify the "onshore natural gas processing industry segment" definition to state that the throughput threshold is based on an annual average and not a capacity rating, and that the throughput threshold for glycol dehydrators and onshore production storage tanks are also based on annual average throughput.
- Amend language to clarify that the natural gas processing industry segments must include N₂O emissions in addition to CO₂ and CH₄ emissions.
- Clarify that the natural gas distribution industry segment must report CO₂ and CH₄ emissions.
- Correct Equations W-1 and W-2 to clarify the calculations for natural gas pneumatic device venting.
- Clarify the methodological options for calculating emissions from acid gas removal units.
- Amend the calculation methods for determining emissions from dehydrator vents to clarify that the throughput threshold is to be determined using an annual average daily throughput.
- Amend Equation W-8 to clarify the methodology used to calculation emissions from well venting for liquids unloading. Amend Equation W-13 to include corrections and clarifications to the parameter definitions to reflect standard conditions and not actual conditions.
- Make technical corrections to Equation W-14 to clarify that the variable V_v is the actual physical volume.
- Make technical corrections to Equations W-16, W-40, and W-41.
- Clarify that the throughput threshold referenced in calculation methodologies 1-4 (40 CFR 98.233(j)) is based on an annual average daily throughput of oil.
- Revise the emission factor tables (Table W-3 and W-4) for high bleed, low bleed, and intermittent bleed pneumatic devices, which were on a CH₄ basis, to account for a total hydrocarbon basis. Other technical corrections to the calculation methodologies to better clarify how emissions are to be reported annually.

Subpart FF (Underground Coal Mines)

- Make technical corrections to Equations FF-1 and FF-2 to clarify that variables do not represent "daily" rates, and also revising Equation FF-1 to allow facilities to use the annual average barometric pressure from the nearest NOAA weather service station as a default to measuring ventilation system pressure.
- Amend language to clarify the placement and timing of sampling for moisture content, and include reference to calibration and documentation of procedures for moisture content monitors.

- Clarify that facilities may use MSHA data for the methane flowrate, but must sample temperature, pressure, and moisture content at the same time and location of the MSHA samples.
- Clarify the types of monitoring equipment required; also allow the use of infrared and flame ionization analyzers, if calibrated appropriately.

Subpart II (Industrial Wastewater Treatment)

- Amend Equation II-4 to clarify to refer to “average temperature” and “average pressure” to clarify how reporters should use the multiple temperature and pressure measurements that they may make during a measurement period. Also amending the definitions to Equation II-4 to show how to adjust the calculations if the flowmeter automatically corrects for temperature and pressure.
- Clarify that for weekly sampling, if only one measurement is made each calendar week, there must be at least three days between measurements.
- Correct Equation II-6 to eliminate the possibility that the equation will return incorrect quantities of methane emissions.
- Amend 40 CFR 98.253(c) to clarify that continuous gas flow monitoring is required for each anaerobic sludge digester, anaerobic reactor, or anaerobic lagoon from which some biogas is recovered. Clarify that these continuous gas flow measurements must be used to determine cumulative gas production each week.
- Amend reporting requirements to clarify that reporters should provide the average depth of each lagoon, not all lagoons combined.
- We are proposing to amend 40 CFR 98.356(b) to clarify that the values for Bo and MCF, that are used as inputs to Equation II-1 or II-2, are to be taken from Table II-1.
- Clarifying terminology throughout this subpart (e.g., replacing the term “anaerobic digester” with “anaerobic sludge digester” and replacing “gas” with “biogas”).

Subpart OO (Suppliers of Industrial Greenhouse Gases)

- Amend data reporting requirements to require that the data elements currently reported under 40 CFR 98.416(a)(8) and (9), including the total mass in metric tons of each reactant fed into the F-GHG or nitrous oxide production process, by process, and the total mass in metric tons of the reactants, by-products, and other wastes permanently removed from the F-GHG or nitrous oxide production process, by process, be kept as a record rather than reported.

Subpart RR (Geologic Sequestration of Carbon Dioxide)

- Amend language to account for CO₂ entrained in produced water that is not processed through a gas-liquid separator in the mass balance equation.
- Revise the term “CO₂ equipment leakage and vented CO₂ emissions” to ensure consistency in terminology and to more accurately describe the equipment between flow meters and wellheads for which monitoring requirements are specified.
- Clarify when reporters begin collecting data for calculating the total amount of CO₂ sequestered.

Subpart TT (Industrial Waste Landfills)

- Amend language to provide methodologies for closed landfills or active landfills that have stopped accepting certain types of wastes to determine the volatile solids concentration or to determine the waste-specific DOC values for historically disposed waste streams.
- Remove Equation TT-7 and revise Equation TT-9 to correct errors in the units of volatile solids concentration to a dry basis.
- Amend the definition of the methane correction factor (MCF) to allow landfills with active aeration units to use a default MCF value of 1 or develop a site-specific MCF factor based on the amount of aeration and the fraction of the landfill that is actively aerated.
- Changing the definitions of terms in equations TT-1 and TT-8 to correct the measured CH₄ concentration for zero percent oxygen.
- Defining the term “construction and demolition waste landfills” as defined in subpart HH (Municipal Landfills).
- Clarifying that leachate recirculation rates can be determined from company records or engineering estimates and if leachate recirculation is used, the reporter may elect to use the k value for the wet climate rather than calculating the leachate recirculation rate.

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. This document is intended to assist reporting facilities/owners in understanding key provisions of the proposed rule.

Visit EPA’s Web site (www.epa.gov/climatechange/emissions/ghgrulemaking.html) for more information, including the proposed preamble and rule and additional information sheets on specific source categories, or go to www.regulations.gov to access the rulemaking docket (EPA-HQ-OAR-2011-0147). Any public comments on the proposed rule must be submitted to the docket using the procedures described in the proposal preamble. To submit other questions that cannot be answered through the website or docket, select Rule Help Center, followed by “Contact Us”.