Greenhouse Gas Reporting Program

40 CFR part 98

Subpart HH-Municipal Solid Waste Landfills







Disclaimer



This training 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.



Introduction to the Rule

Overview: U.S. EPA GHG Reporting Program (GHGRP)

- The GHGRP was created by an EPA regulation issued in 2009. The goal of the program is to collect accurate and timely data on GHG emissions to inform future climate policy decisions.
- Annual monitoring requirements for applicable MSW landfills began in 2010 with first reports due by 9/30/2011.
- Over 8,000 facilities across all sectors are reporting, accounting for 85-90% of U.S. GHG emissions.
 - 1,217 MSW landfills submitted 2012 reports
- Monitoring and reporting only, no control or use requirements.













What GHGs are monitored and reported?

- CO₂
- CH₄ (methane)
- N₂O (nitrous oxide)
- Fluorinated GHGs
 - HFCs (hydrofluorocarbons)
 - PFCs (perfluorocarbons)
 - NF₃ (nitrogen trifluoride)
 - SF₆ (sulfur hexafluoride)
 - Other fluorinated gases (except CFC and HCFC and gases <1 mm Hg @25°C)

What is CO₂e?

- The applicability threshold for MSW landfills* is in units of carbon dioxide equivalent (CO₂e)
- GHGs have varying heat-trapping ability and atmospheric lifetimes.
- Global warming potential (GWP) is a metric used to compare emissions among GHGs.
- The GWP of CO_2 is 1.0, and the GWP of other GHGs are expressed relative to CO_2
 - For example, CH₄ has a GWP of 25. Each metric ton of CH₄ emissions would have 25 times as much impact on global warming (over a 100-year time horizon) as a metric ton of CO₂ emissions.
- Mass emissions $x GWP = CO_2e$ (metric tons).
- *we will go over the threshold later in this webinar

Current Version of 40 CFR 98



Available in the electronic Code of Federal Regulations (eCFR) at:

http://ecfr.gpoaccess.gov/cgi/t/text/textidx?c=ecfr&sid=6c812965b3fe4dfd2d7ef9e8cd1d4c2f&tpl=/ecf rbrowse/Title40/40cfr98_main_02.tpl

The MSW Landfill Subpart is located at 40 CFR 98.340 – 98.348 (subpart HH)

This version of the regulation will contain all published rule updates, including recent amendments which updated the GWP for methane from 21 to 25.

http://www.gpo.gov/fdsys/pkg/FR-2013-11-29/pdf/2013-27996.pdf



Subpart HH: Applicability

Which landfills must report?



- Municipal solid waste landfills
 - Definition in 40 CFR 98.6
 - Excludes RCRA Subtitle C and TSCA hazardous waste landfills, C&D waste landfills, and industrial waste landfills
 - Industrial landfills must report to the GHGRP but under a different subpart (subpart TT), with different methods and requirements
- Accepted waste since January 1, 1980
 - Covers both open and closed MSW landfills
- Methane generation \geq 25,000 metric tons CO_2e/yr
 - Applicability based on generation, not actual emissions

Important Definitions



A facility is defined as...

- Physical property, plant, building, structure, source, or stationary equipment;
- on contiguous or adjacent properties;
- in actual physical contact or separated solely by public roadway or other public right of way; and
- under common ownership or common control.

An MSW landfill is defined as...

- An entire disposal facility in a contiguous geographical space where household waste is placed in or on land;
- May also receive other types of RCRA Subtitle D wastes;
- Portions may separated by access roads, public roadways, or public right-of-ways;
- May be publicly or privately owned.

How do I determine applicability?

- Applicability is based on equations in the rule
- EPA online applicability tool may be used for screening purposes
 - < http://www.epa.gov/ghgreporting/help/tool/index.html >
 - Includes a simplified calculator for screening purposes.
- If methane generation is close to 25,000 metric tons CO_2e for 2013, perform more detailed calculations
 - Use equations in the rule
 - Use available data as input to the equations to estimate 2013 generation

How do I calculate generation if I don't have a gas collection system?



$$= \begin{array}{c} G_{CH4} \text{ (modeled} \\ \text{methane} \\ \text{generation from} \\ \text{Eq. HH-1)} \end{array}$$

Eq. HH-1. First order decay model

$$G_{CH4} = \left[\sum_{x=S}^{T-1} \left\{ W_x \times MCF \times DOC \times DOC_F \times F \times \frac{16}{12} \left(e^{-k(T-x-1)} - e^{-k(T-x)} \right) \right\} \right]$$

If waste composition is known, calculate using material-specific DOC and k. Otherwise, use bulk waste or modified bulk waste factors in rule Table HH-1.

Data Needed for Eq. HH-1 (modeled methane generation)

Must determine or measure	In units of	Using the following methods
S = Start year of calculation (year LF opened or 1960)	NA	Available records
MCF=Methane correction factor	Fraction	Use the default value of 1, unless there is active aeration of waste within the landfill during the reporting year, in which case use an alternative value between 0.5 and 1
DOC= Degradable organic carbon	Fraction Metric tons C/metric ton waste	Use bulk waste, modified bulk MSW, or material-specific default values from Table HH-1
DOC _F =Fraction of DOC dissimilated	Fraction	Use default value of 0.5
F=Fraction by volume of CH4 in landfill gas	Fraction	From measurement data on a dry basis, if available, or use default value of 0.5
k=Rate constant	Yr-1	Use bulk waste, modified bulk MSW, or material-specific default values from Table HH-1. If using bulk waste k-values, select most applicable value for the majority of the past 10 years based on amount of precipitation plus recirculated leachate.

Data Needed for Eq. HH-1 (modeled methane generation) (continued)

Must determine or measure	In units of	Using the following methods
W _x = quantity of waste disposed in year X (for each year since start year of calc)	Metric tons, as received (wet waste)	For reporting year and all future years determine Wx using one of the following*:
		1) Landfills with scales in place
		- Use scales to weigh loads both before and after off-loading OR
		- Use scales to weigh loads before off-loading and tare vehicle/container weights after off-loading
		2) Landfills without scales
		- Use working capacity for each vehicle/container, e.g. determine volumetric capacity of each container, use average density of waste as received, & record number of loads by type of vehicle/container
		For years prior to 2010, determine Wx using one of the methods above or through tipping fee receipts or other company records. For prior years for which quantities are not available, estimate Wx using one of 3 methods:
		Assume all prior years are the same as the first year for which waste data are available
		2) Eq. HH-2: calculate for each year based on population served and per capita waste disposal rate specified in Table HH-2
		Eq. HH-3: use a constant annual average calculated from landfill capacity and number of years waste was received

^{*} For loads other than cars, light-duty trucks, and loads that cannot be measured with scales due to physical or operational limitations.

How do I calculate generation if I have a gas collection system?



- •Use 2 methods. If *either* result exceeds threshold, the landfill must report
 - Method 1. Same as for LFs without gas collection
 - Method 2. Combination of Eq. HH-4 (calculates methane recovery from measured GCS flow and CH4 concentration) AND Eq. HH-7 (calculates generation using methane recovery from HH-4 and assumed gas collection efficiency, and adjusts for soil oxidation)

Measuring CH4 Recovered: Overview



- CH₄ recovered must be determined if landfill has gas collection
 - Continuously monitor gas flow
 - Monitor CH₄ concentration continuously OR measure monthly (allows use of handheld meters)
 - Adjust measurements for temperature, pressure, and moisture
 - See 98.343(b) & Eq. HH-4 for details
- Measure in Gas Collection System (GCS) header prior to destruction device or treatment equipment
 - Knockout pots, compressors, blowers, etc. are not treatment
- Measure CH₄ concentration near the flow monitor or at a location representative of flow monitor location

Determining Collection Efficiency



- Collection efficiency must be determined for the second generation calculation method (collection efficiency is applied to CH₄ recovered to account for uncollected gas)
- Select collection efficiency (CE) from Table HH-3 based on landfill cover type and presence of active collection system
 - If areas within the landfill differ in terms of cover type or presence of collection system, determine CE for each area and determine overall weighted CE for landfill per equation in Table HH-3
- If area by cover type is not available, use CE = 0.75

Determining Soil Oxidation

- Methane generation must be adjusted for soil oxidation for both methane generation calculation methods
 - Prior to the 2013 RY a default value of 10% must be used
 - Starting in 2013 RY you may use 0%, 10%, 25%, or 35% depending upon the conditions at your landfill
 - Depth of soil cover over majority of the landfill cover
 - Methane flux in grams per square meter per day (g/m²/d)
 - the mass flow rate of methane per unit area at the bottom of the surface soil prior to any oxidation. Detailed equations provided in the rule.

Table HH-4 Methane Oxidation Fraction

	i
Under these conditions:	Use this landfill methane oxidation fraction:
I. For all reporting years prior to the 2013 reporting year	
C1: For all landfills regardless of cover type or methane flux	0.10
II. For the 2013 reporting year and all subsequent years	
C2: For landfills that have a geomembrane (synthetic) cover with less than 12 inches of cover soil for the majority of the landfill area containing waste	0.0
C3: For landfills that do not meet the conditions in C2 above, and for which you elect not to determine methane flux	0.10
C4: For landfills that do not meet the conditions in C2 above and that do not have a soil cover of at least 24 inches for a majority of the landfill area containing waste	0.10
C5: For landfills that have a soil cover of at least 24 inches for a majority of the landfill area containing waste and for which the methane flux rate is less than 10 g/m²/d	0.35
C6: For landfills that have a soil cover of at least 24 inches for a majority of the landfill area containing waste and for which the methane flux rate is 10 to 70 g/m²/d	0.25
C7: For landfills that have a soil cover of at least 24 inches for a majority of the landfill area containing waste and for which the methane flux rate is greater than 70 g/m²/d	0.10

If there is gas collection...



• If the landfill has gas collection and *either* the result of Equation HH-5 or HH-7 meets the 25,000 metric ton CO2e threshold then you must report to the GHGRP.

Recent Amendment to the Rule

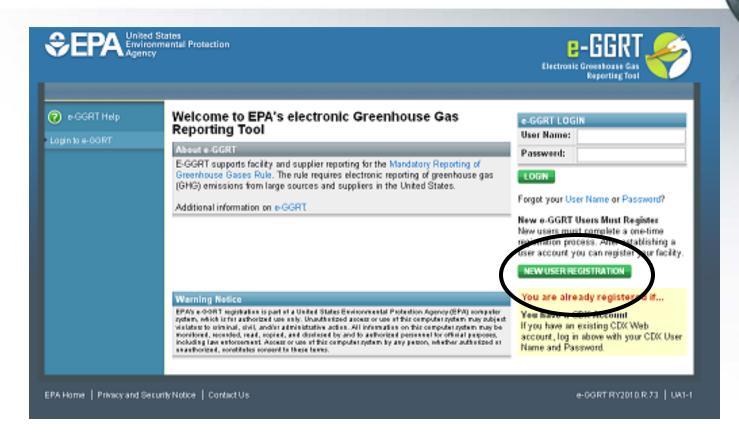


- GWP for CH₄ increased from 21 to 25
- EPA is providing a specific exclusion for certain small, older, closed MSW landfills.
 Reporting is not required if:
 - Landfill did not receive waste after January 1, 2013
 - Methane generation was less than 1,190 metric tons
 CH₄ in 2013
 - Landfill was not required to report to the GHGRP in reporting years prior to 2013
- http://www.gpo.gov/fdsys/pkg/FR-2013-11-29/pdf/2013-27996.pdf



Registering and Reporting

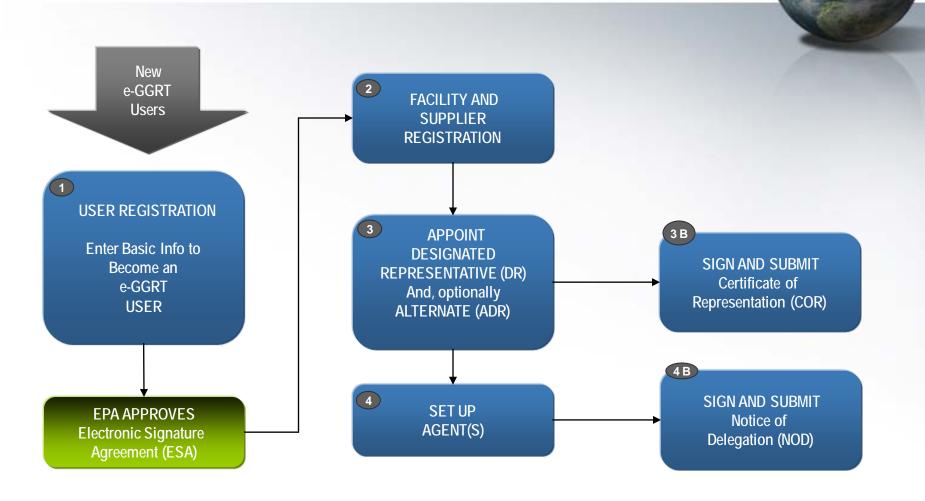
Electronic Reporting System



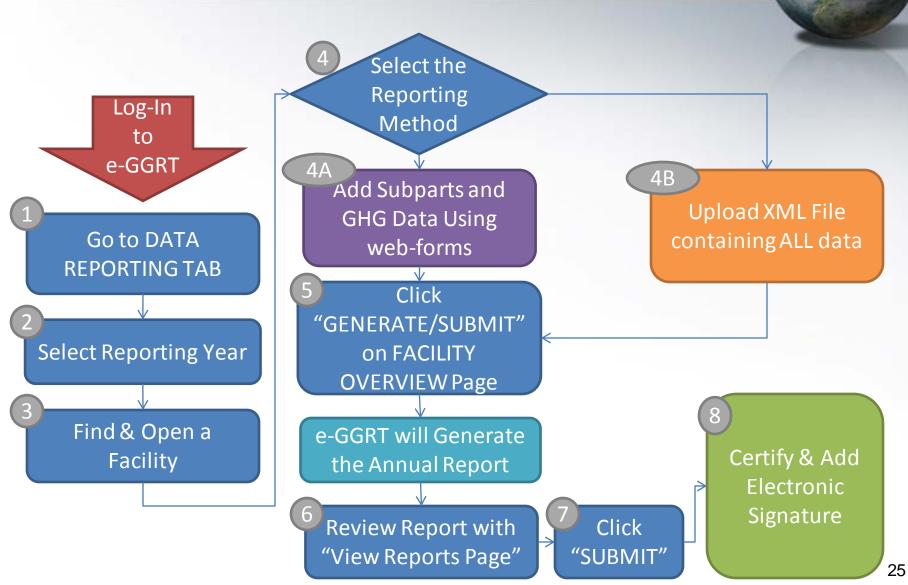
All registration and reporting is done electronically on EPA's Greenhouse Gas Reporting Tool (e-GGRT).

https://ghgreporting.epa.gov/

E-GGRT Registration: The Basic Process



Submitting Annual Reports



MSW Landfills Reporting



- Report 3 key items:
 - CH₄ generation and emissions from the landfill (HH)
 - CH₄ destruction from collection and combustion (HH)
 - CH₄, CO₂ and N₂O from combustion devices (reported under subpart C)
- What do I report for landfill flares?
 - Subpart HH calculations and reporting includes CH₄
 destruction in flares and CH₄ emitted from flares
 - CO₂ and N₂O from flares is not reported under HH or C

How will emissions be verified?



Self certification

- Designated representative certifies report
- Rule requires one designated representative (DR) and allows one alternate designated representative (ADR) for each facility and supplier

EPA verification

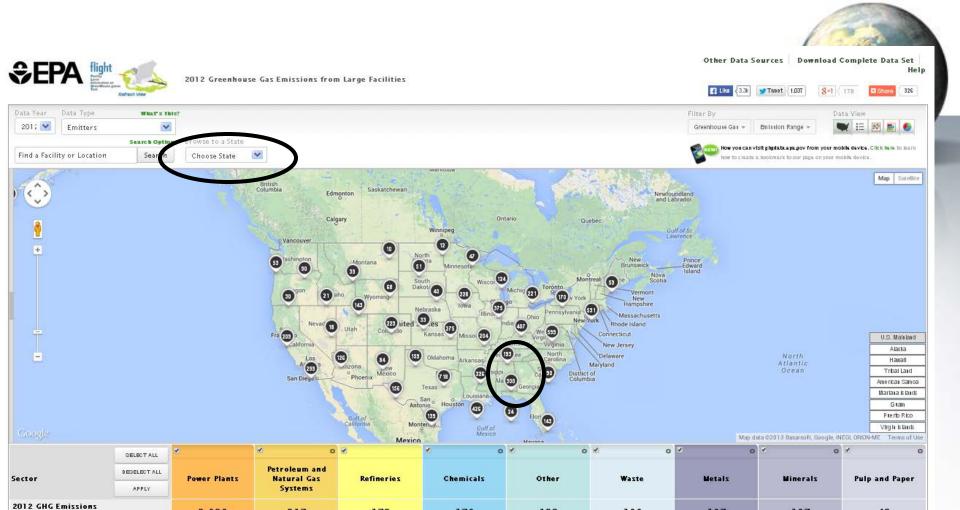
- Reports submitted through an electronic system
- Built-in calculation and completeness checks for reporters
- Electronic QA and consistency checks
- EPA data and report review and follow-up with reporters

GHG Data Publication



- The data reported to the GHGRP are available on the website.
 (See EPA's ghgdata website at http://ghgdata.epa.gov.)
- EPA will publish only non-CBI data
- The GHGRP data publication tool
 - Displays facilities on a map
 - Creates charts, graphs, and lists
 - Enables data download
 - Leverages social media





1,419

1,611

2,090

1,611

(Willion Matric Tons CO₂n)
of Reporting Facilities

2,058

🆖 This data set does not reflect total U.S. GHG emissions. Learn more about related EPA GHG data sources. Data reported to EPA as of 09/01/2013.

FLIGHT R.68



2012 Greenhouse Gas Emissions from Large Facilities





FLIGHT R.68

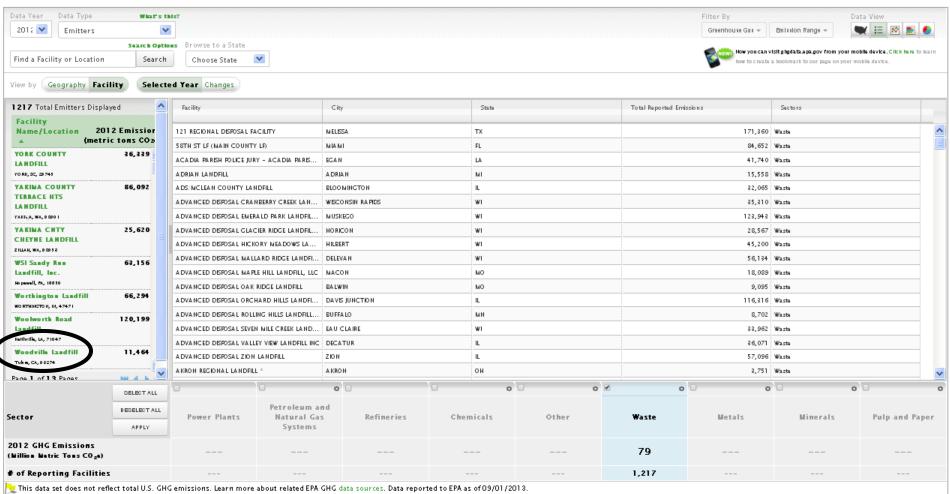


Other Data Sources Download Complete Data Set

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SEPA Flight Park To the Park T

2012 Greenhouse Gas Emissions from Large Facilities



FLIGHT R.68

Schedule for Monitoring and Reporting

Deadline	Action
January 1, 2014	Begin collecting data using required methods in each subpart
December 31, 2014	Complete data collection for the 2014 reporting year
March 31, 2015	Submit annual report for the 2014 reporting year

- Annual reports for the 2013 reporting year are due March 31, 2014.
- Reports for the 2010, 2011, and 2012 reporting years were already due. E-GGRT is still accepting reports for these years.

When can an MSW landfill stop annual reporting?



- Notify EPA via e-GGRT by March 31 of the year after you meet one of the following conditions:
 - If annual reports demonstrate CO_2 e <u>emissions</u> < 25,000 metric tons/yr for 5 consecutive years.
 - If annual reports demonstrate CO_2 e <u>emissions</u> <15,000 metric tons/yr for 3 consecutive years.
- You must resume reporting in future year if your emissions rise above 25,000 metric tons in a future year



For More Information

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www.epa.gov/ghgreporting

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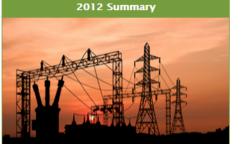
Greenhouse Gas Reporting Program

If you report to the Greenhouse Gas Reporting Program, or you think you might be required to, visit the For Reporters page for resources, tools, and training opportunities.

EPA's Greenhouse Gas Reporting Program will help us better understand where greenhouse gas emissions are coming from and will improve our ability to make informed policy, business, and regulatory decisions.



With EPA's Facility Level Information on GreenHouse gases Tool (FLIGHT), you can quickly and easily filter GHG data in a variety of ways, including by facility, industry, location, or gas. Click the map to launch the tool



In 2012, power plants accounted for about 40% of U.S. carbon pollution and 67% of direct emissions reported under the GHGRP. Learn more about what 2012 GHGRP data reveal about U.S. GHG emissions.

For GHG Reporters

If you are required to report Gas Reporting Program, or you want to know more about the requirements, visit the Reporting Resources page.



- · Revisions to GHGRP and Confidentiality Determinations for 33 subparts
- Proposed Subpart L amendments
- EPA releases 2012 GHGRP Data
- · EPA proposes amendments to 24 subparts
- · New Features in FLIGHT
- Subpart I amendments finalized

Climate Change Links

- · Climate Change Home
- · U.S. GHG Annual Inventory

ghodata

For GHG Reporters

Help Center

Comprehensive greenhouse gas (GHG) data reported directly to EPA from across the country are now easily accessible to the public through EPA's GHG Reporting Program (GHGRP). The 2011 GHGRP data set includes public information from facilities in nine industry groups that directly emit large quantities of GHGs, as well as suppliers of certain fossil fuels and industrial gases.



Technical Assistance

- Online applicability tool: Assists potential reporters in assessing whether they are required to report
 - http://www.epa.gov/ghgreporting/help/tool/index.html
- Technical assistance materials specific to MSW landfills (e.g., Information Sheets, Monitoring Checklists, FAQs)
 - http://www.epa.gov/ghgreporting/reporters/subpart/hh.html
- Trainings and webinars
 - http://www.epa.gov/ghgreporting/reporters/training/index.html
- Information on the electronic greenhouse gas reporting tool (e-GGRT)
 - http://www.epa.gov/ghgreporting/reporters/datasystem/index.html