

Greenhouse Gas Reporting Program Subpart W: Petroleum and Natural Gas Systems

Best Available Monitoring Methods (BAMM)

November 17, 2011 Jerome Blackman, Kong Chiu, US EPA



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.

Outline



- Subpart W Overview
- Best Available Monitoring Methods (BAMM) provisions of Subpart W
- How to apply for BAMM for 2012, if needed
- How to register facilities and Designated Representatives in the Electronic Greenhouse Gas Reporting Tool (e-GGRT)

Subpart W Overview



Subpart W requires petroleum and natural gas facilities that emit 25,000 metric tons or more of CO₂e per year to report:

- offshore petroleum and natural gas production
- onshore petroleum and natural gas production
- onshore natural gas processing
- onshore natural gas transmission compression
- underground natural gas storage
- liquefied natural gas (LNG) storage
- LNG import and export equipment
- natural gas distribution

Background to Subpart W BAMM

- November 2010 –Subpart W Published in FR
- January 1, 2011 Data Collection Began for W Reporters.
 Reports Due September 2012.
- June 2011 Proposed rule to allow automatic BAMM for all sources for 2011
- September 2011 Finalized rule granting automatic BAMM for 2011, and in future years allowing use of BAMM in cases of unique or unusual circumstances, upon EPA approval

Background to Subpart W BAMM



- Final BAMM Rule (76 FR 59533)
 - Permits use of BAMM for all measurements for calendar year 2011 without being required to submit a request for approval from the Administrator
 - Gives owners and operators additional time to request to use BAMM beyond 2011

How Do I Use BAMM?



• Reporters MUST estimate emissions using applicable equations in rule

 Reporters MAY use approved BAMM for estimating equation inputs

What Methods Qualify as BAMM?



BAMM could include the following:

- Monitoring methods currently used by your facility that do not meet the specifications of a relevant subpart (including use of industry accepted or company used emission factors, e.g., the API Compendium)
- Supplier data
- Engineering calculations
- Other company records

To What Sources does BAMM apply?



- If a parameter cannot reasonably be measured:
 - 98.234(f)(2): Well-related emissions
 - 98.234(f)(3): Specified activity data
 - 98.234(f)(4): Leak detection and measurement
 - 98.234(f)(5)(iv): All sources not listed above

2011 – BAMM Automatic



- In 2011, option to use BAMM is granted automatically
- No need for notice of intent (NOI) submission or BAMM request submission
- Use of BAMM does not impact reporting obligations- you must still follow the reporting requirements in 98.236, but your report will reflect the methods you used for BAMM.

Requests to use BAMM in 2012



- EPA does not anticipate a need for BAMM in 2012
- EPA will only approve BAMM if and applicant demonstrates <u>unique or unusual</u> circumstances according to 98.234(f)(8)(iii).
- Two Step Process NOI must be submitted by 12/31/11 and BAMM Request must be submitted by 3/30/12
 - A reporter must submit both NOI & BAMM requests by the respective deadlines
 - Each reporter must specify in every facility's BAMM application the amount of time BAMM is needed, and a description of <u>unique and unusual</u> circumstances. In order to give compliance assurance, EPA will automatically grant BAMM through June 30, 2012 for every BAMM application submitted by March 30, 2102.
 - Between March 30 and June 30, 2012 EPA will evaluate every BAMM application. EPA will only approve BAMM beyond June 30, 2012 if an application clearly demonstrates unique or unusual circumstances. EPA will send notification of rejected BAMM applications by June 2012.

Requests to use BAMM for 2012



• Owners or operators that submit an NOI but do not follow up with the BAMM request by March 30, 2012 cannot use BAMM in 2012.

Subpart W BAMM Process



2011

Automatic

2012

Through June 30

Automatic if:

- Notice of Intent submitted by 12/31/11
- BAMM application submitted by 3/30/12

2012

Beyond June 30

Considered by EPA for unique or unusual circumstances:

- •Notice of Intent submitted by 12/31/11
- •BAMM application submitted by 3/30/12

2013 and beyond

Considered by EPA for unique or unusual circumstances:

 BAMM application submitted by 9/30 of previous year

BAMM Request Process for 2012



Facility registers Designated Representative and facility through e-GGRT in 2011 **prior** to submitting Notice of Intent

Facility submits Notice of Intent by December 31, 2011

Facility submits BAMM request by March 30, 2012

If both documents are submitted by respective deadlines, AUTOMATIC BAMM through June 30, 2012

Use of BAMM between June 30 - December 31, 2012 is subject to EPA approval

BAMM Request Process for 2013 and Beyond



Facility registered in e-GGRT (completed)

Facility submits BAMM request by September 30 of PRECEDING year for which BAMM is sought

BAMM extensions are subject to receiving EPA approval by December 31. NO AUTOMATIC BAMM.

Each BAMM request will be approved for a maximum of one calendar year ending on the date requested or by December 31, whichever is earlier.

How do I submit NOI and BAMM requests?



- NOI and BAMM requests must be submitted through e-GGRT
- EPA now modifying e-GGRT to accept both NOIs and BAMM requests.
 - e-GGRT will be able to accept NOIs by November 2011 (to meet the December 31, 2011 deadline for submission of NOIs).
 - e-GGRT will be able to accept the full BAMM request before the March 30, 2012 deadline.

How do I submit NOI and BAMM requests? (cont'd)

- Facilities reporting under subpart W that also reported for the 2010 data collection year (e.g., under another subpart) are already registered with e-GGRT
- For facilities reporting for the first time in 2011, you must register the facility and Designated Representative in 2011 prior to submitting an NOI.
- If you do not plan to use BAMM in 2012, then the registration deadline is July 30, 2012.

Who can submit the NOI and BAMM request?



- Each NOI and BAMM request must be submitted by the Designated Representative, or an alternate designated representative, or agent.
- A single Designated Representative may represent multiple facilities.
- An association cannot submit NOI or BAMM requests for multiple facilities.

NOI's and BAMM Requests



• An NOI or BAMM request submitted prior to the effective date of the final BAMM rule revision (76 FR 59533, September 30, 2011) is not valid.

 Reporters must submit an NOI due by December 31, 2011 and BAMM application due by March 30, 2012 for use of BAMM during 2012.

BAMM Requests for 2012 and Beyond



- See 76 FR 59533, section 98.234(f)(8)(ii) for requirements for content of BAMM request
 - List of industry segments and parameters for which BAMM is requested
 - Description of <u>unique and unusual</u> circumstances justifying BAMM
 - Explanation of how and when the facility will comply with all Subpart W reporting requirements

For More Information



- Subpart W Information <u>http://www.epa.gov/ghgreporting/reporters/subpart/w.html</u>
- GHG Reporting Program Information: <u>http://www.epa.gov/ghgreporting/reporters/index.html</u>
- Questions on the rule <u>http://www.epa.gov/ghgreporting/contactus.html</u>
- Email GHGreporting@epa.gov



For a copy of these slides, visit:

www.epa.gov/ghgreporting/reporters/training/index.html



Electronic Greenhouse Gas Reporting Tool (e-GGRT)



E-GGRT Overview

- Purpose of this portion of the webinar
- About e-GGRT
- e-GGRT & NOI / BAMM
- e-GGRT user registration
- e-GGRT facility/supplier registration
- Registering Designated Representatives (DR), Alternate Designated Representatives (ADR) and Agents
- Questions & Answers

About e-GGRT

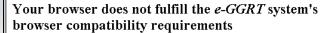


https://ghgreporting.epa.gov

- Web-based system
 - Will guide reporters through data entry and submission
 - Built-in calculations
- Reporters may choose to format their annual GHG report according to the e-GGRT XML schema
 - These reporters must meet the same registration and submission deadlines as all other reporters

About e-GGRT

- System Requirements
 - Internet Explorer 7+ or Firefox 3+
 - Javascript enabled in the browser
 - Transport Layer Security (TLS) enabled in the browser
 - PDF reader (e.g. Adobe Reader)
 - Access to printer (for Electronic Signature Agreement)
 - Access to the Internet
 - Personal (private) email account
- E-GGRT performs a browser test and will redirect to these pages if you fail
- E-GGRT enforces a ten-minute inactivity timeout.



The following browser versions are supported

- Microsoft Internet Explorer 7.0 (or above) Go to Download website
- Mozilla Firefox 3.0 (or above) Go to Download website

Your current Browser is Microsoft Internet Explorer v6.0

EPA Home | Privacy and Security Notice | Contact Us

Your browser does not fulfill the e-GGRT system's browser compatibility requirements.

Reason: JavaScript is disabled on this browser

Solution: You must enable JavaScript on this browser before you can use e-GGRT. Instructions for enabling JavaScript are provided below. After you have enabled JavaScript, refresh this page.

Internet Explorer (7.0 and 8.0)

- 1. Select 'Tools' from the top menu
- 2. Choose 'Internet Options'
- 3. Click on the 'Security' tab
- 4. Click on 'Custom Level'
- 5. Scroll down until you see section labeled 'Scripting'
- 6. Under 'Active Scripting', select 'Enable' and click OK

Mozilla Firefox (3+)

- Select 'Tools' from the top menu
- 2. Choose 'Options'
- 3. Choose 'Content' from the top navigation
- 4. Select the checkbox next to 'Enable JavaScript' and click OK

EPA Home | Privacy and Security Notice | Contact Us

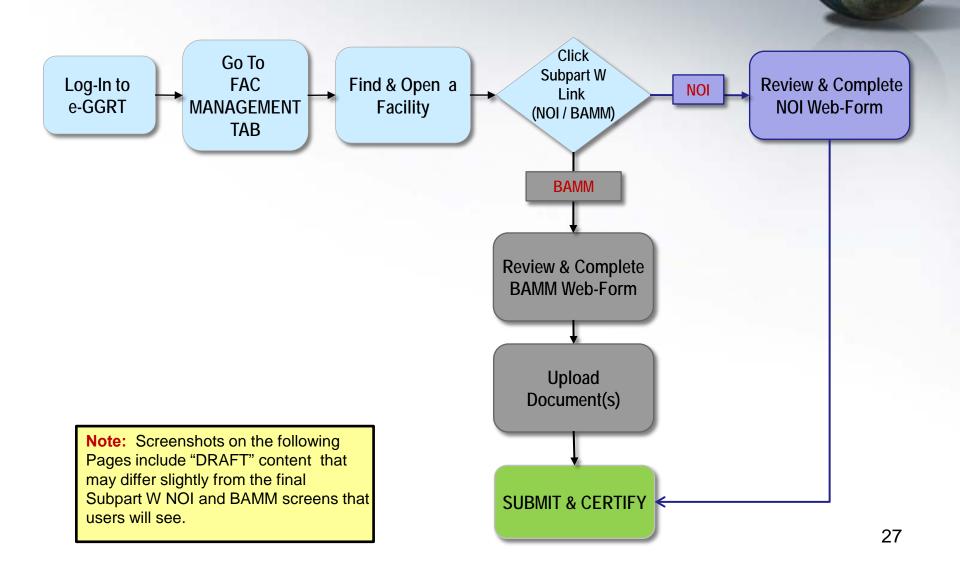


e-GGRT RSS Feed



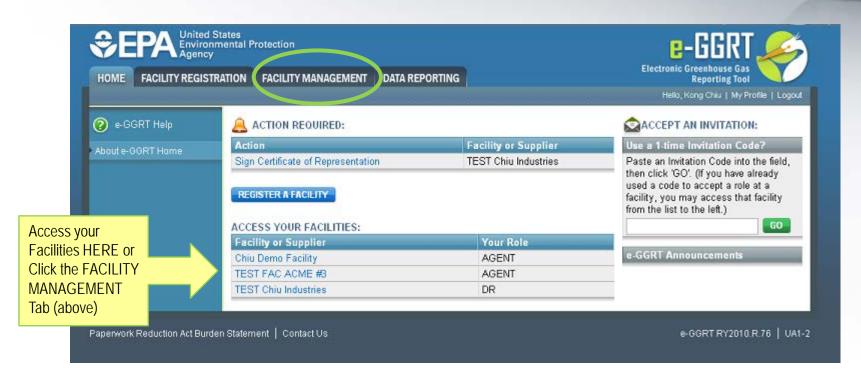
- RSS web feed/syndication format
- e-GGRT specific updates, may include
 - e-GGRT outages, system status
 - e-GGRT software tips, bugs & work-arounds
 - e-GGRT FAQs
 - Other important announcements
- Subscribe:
 - http://www.ccdsupport.com/confluence/createrssfeed.action?types=blogpos t&spaces=eggrtrss&title=e-GGRT&labelString%3D&excludedSpaceKeys%3D&sort=modified&maxResult s=10&timeSpan=10&showContent=true&showDiff=true&confirm=Create+R SS+Feed
- Read the Blog:
 - http://www.ccdsupport.com/confluence/display/help/e-GGRT+RSS
- e-GGRT Help:
 - www.ccdsupport.com

Using e-GGRT for NOI and BAMM: Overview

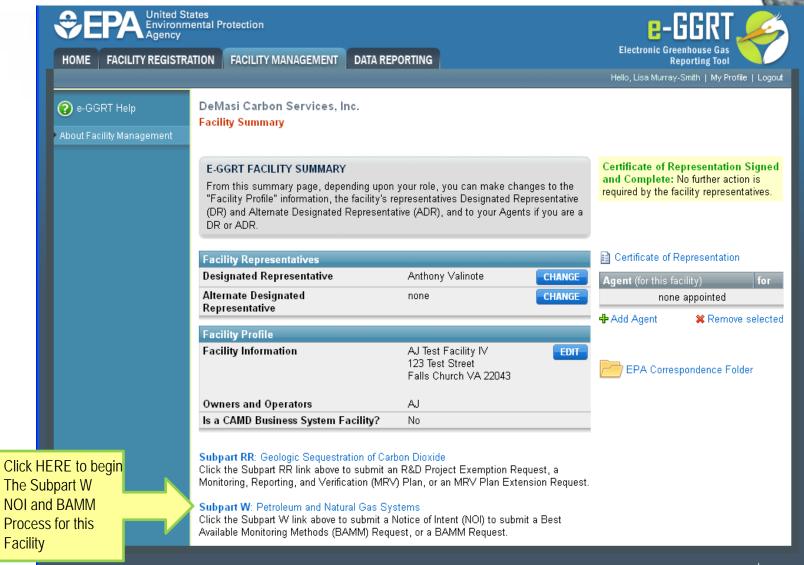


e-GGRT Home Screen

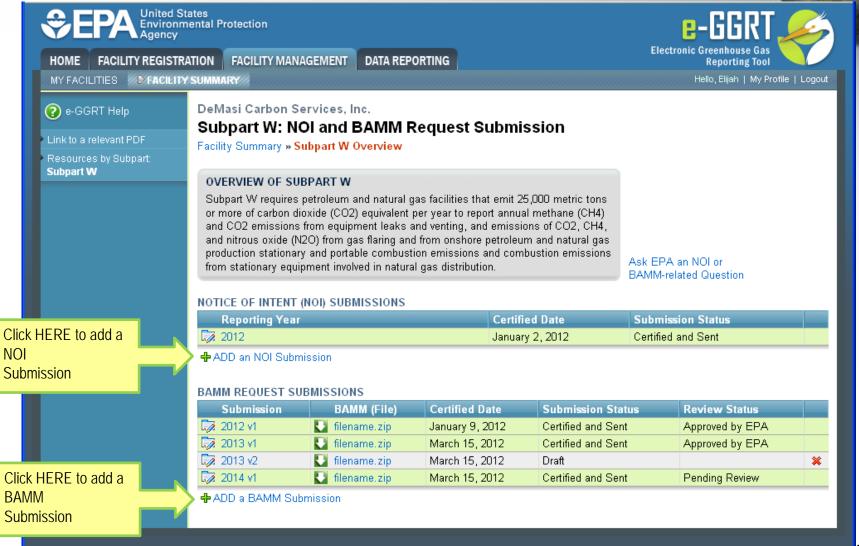




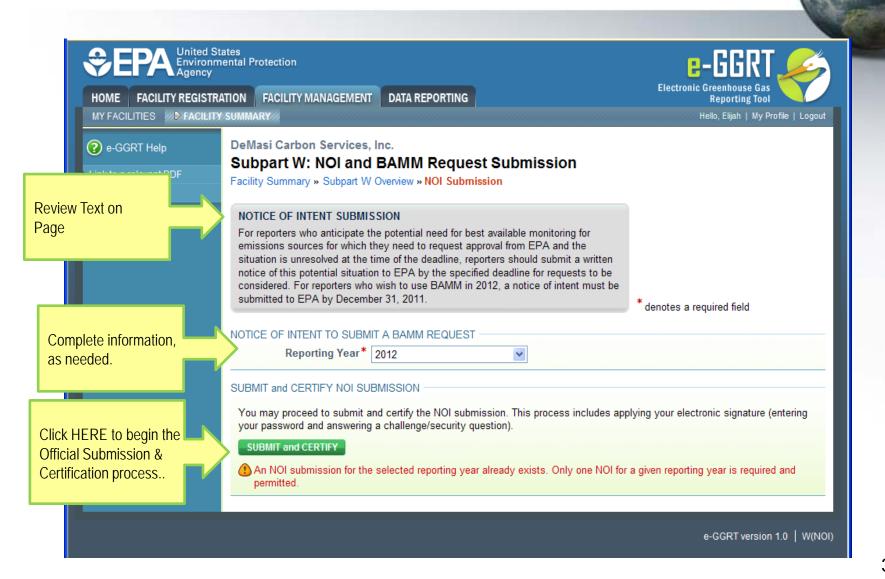
Facility Summary Screen



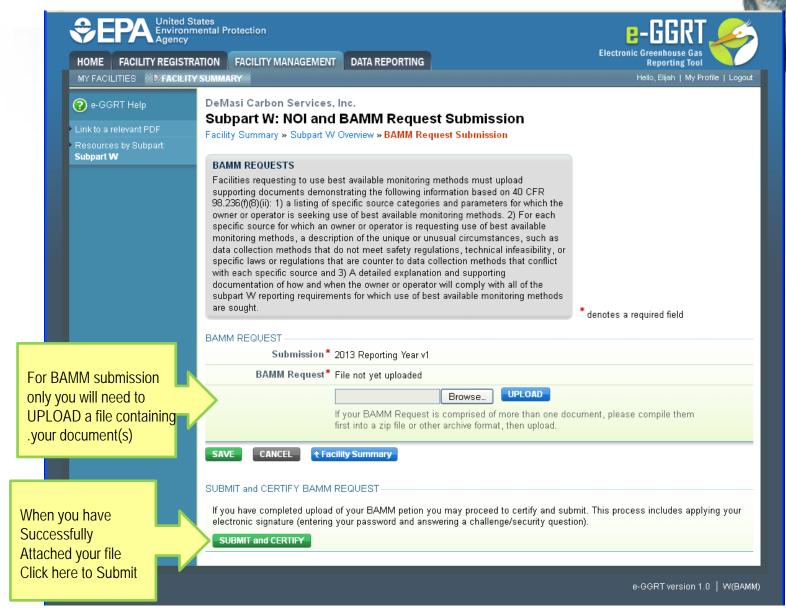
Subpart W Overview



NOI / BAMM Web-Form(s)



BAMM File Upload



Sign/Certify/Submit





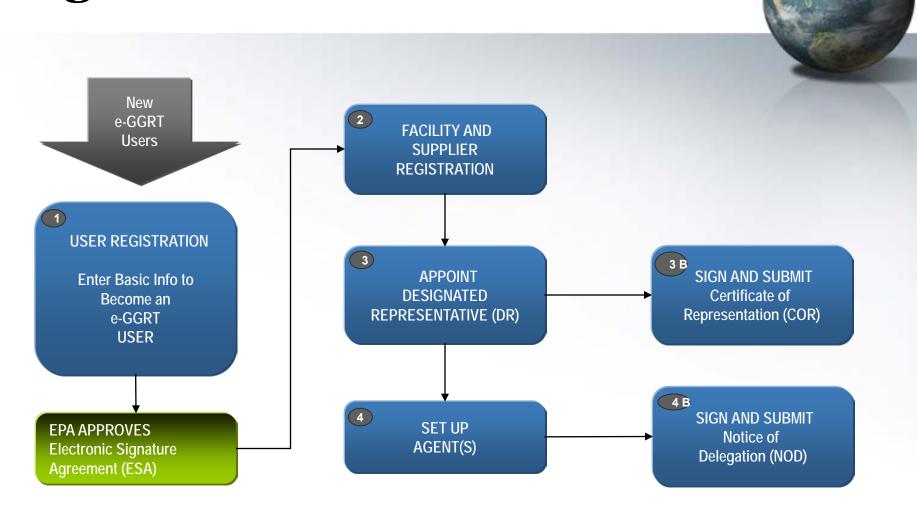
User Registration: Getting Started



- Video Tutorials available at:
 - http://www.ccdsupport.com/confluence/display/help/ Tutorials
- Information you will need includes:
 - Name
 - Mailing address
 - Email address
- If you are an EPA Central Data Exchange (CDX) user: CDX User Name and Password



Registration: Overview



User Registration: Login Page



Context sensitive help on every page Protection Electronic Greenhouse Gas Reporting Tool ? e-GGRT Help Welcome to EPA's electronic Greenhouse Gas e-GGRT LOGIN Reporting Tool User name: About e-GGRT Password: EPA's electronic Greenhouse Gas Reporting Tool (e-GGRT) supports facility and supplier reporting for the Mandatory Reporting of Greenhouse Gases Rule. The rule LOGIN requires electronic reporting of greenhouse gas (GHG) emissions from large sources and suppliers in the United States, Forgot your User name or Password? Additional information on e-GGRT New e-GGRT Users Must Register New users must complete a one-time registration process. After establishing user account you can register your **NEW USER REGISTRATION** You are already registered if... You have a CDX Account EPA's e-GGRT Registration procedure is part of a United States Environmental Protection Agency If you have an existing CDX Web (EPA) computer system, which is for authorized use only. Unauthorized access or use of this account, login above with your CDX computer system may subject violators to criminal, civil, and/or administrative action. All information on Username and Password. this computer system may be monitored, recorded, read, copied, and disclosed by and to authorized personnel for official purposes, including law enforcement. Access or use of this computer system by any person, whether authorized or unauthorized, constitutes consent to these terms. EPA Home | Privacy and Security Notice | Contact Us eGGRT RY2010.6.0 | UA1-1

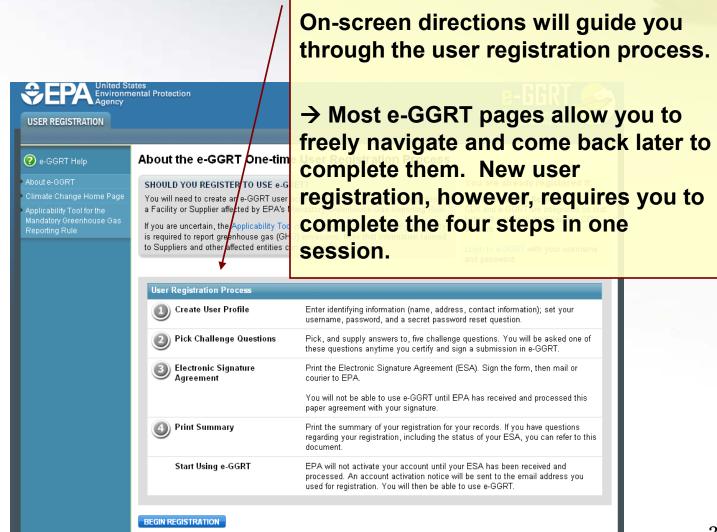
As a new e-GGRT user you will start at the e-GGRT login page:

https://ghgreporting.epa.gov

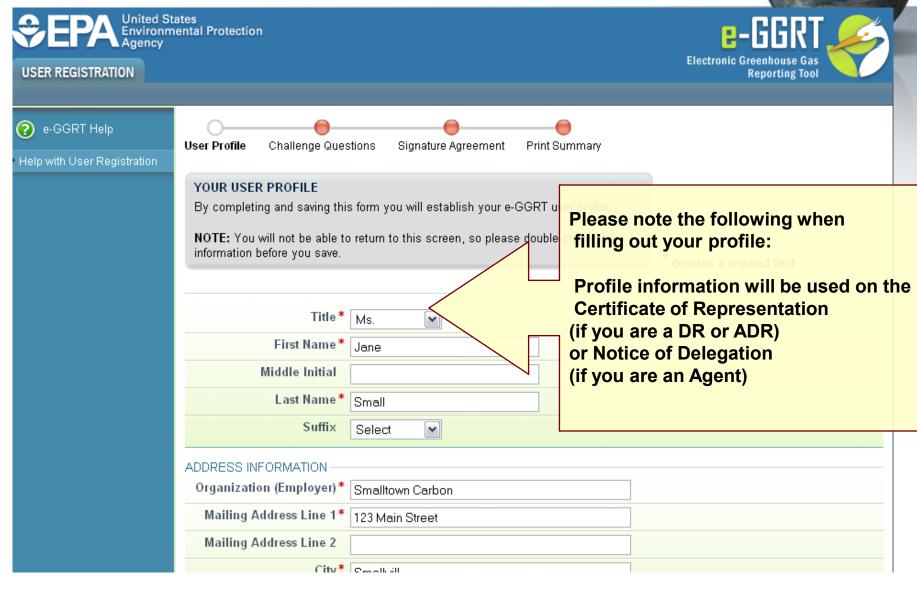
If you have a CDX account then log in with your CDX credentials here

Otherwise, click the green NEW USER REGISTRATION button

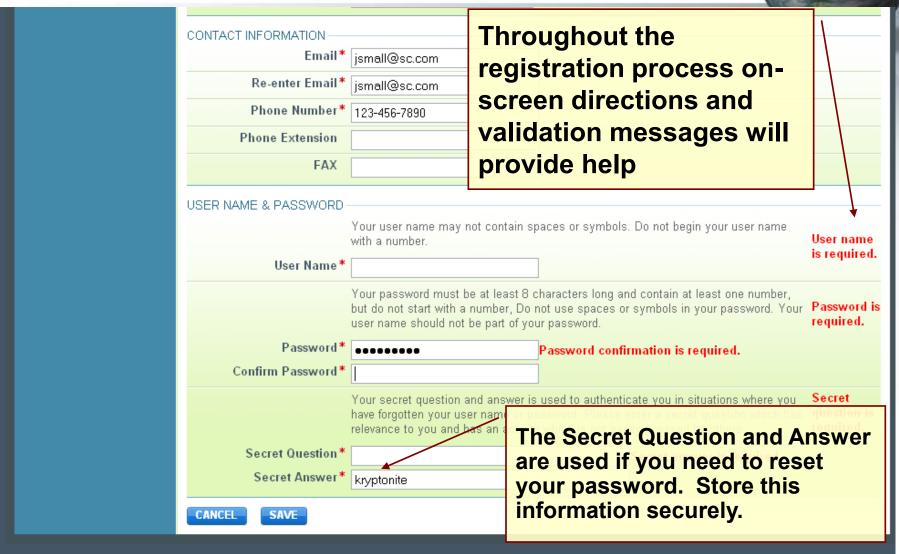
User Registration: On-Screen Directions



User Registration: Your User Profile

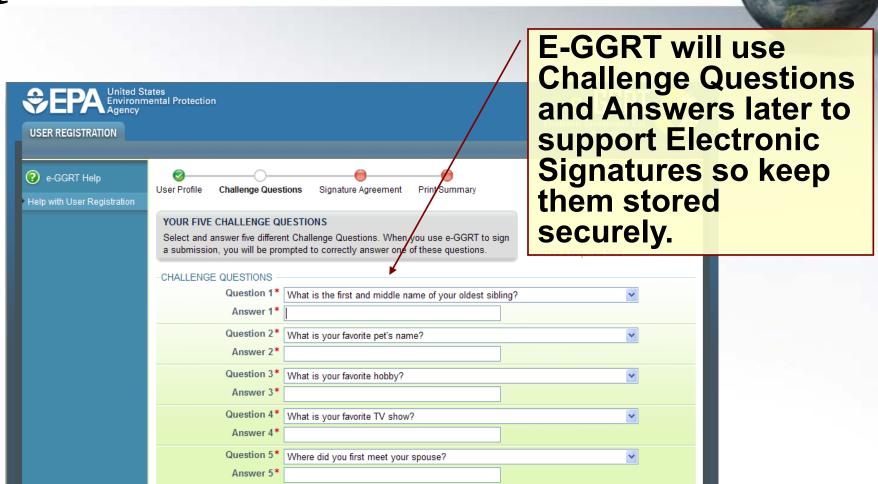


User Registration: On-Screen Directions

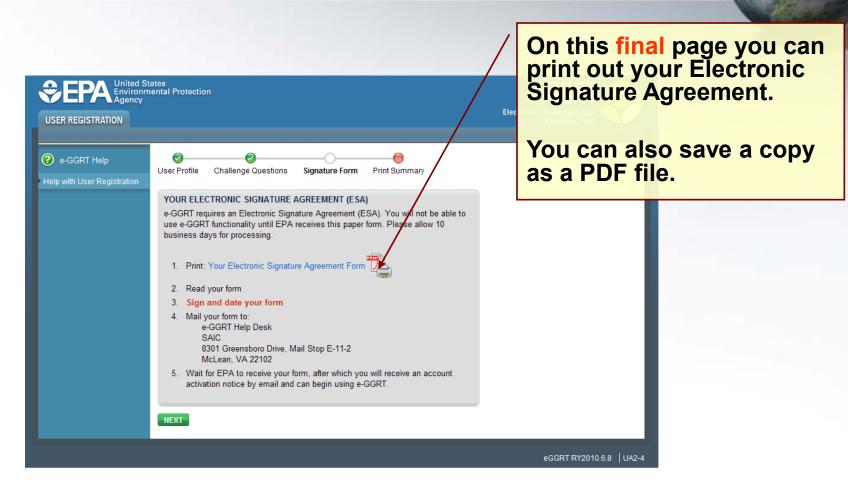


User Registration: Challenge Questions

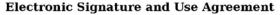
SAVE

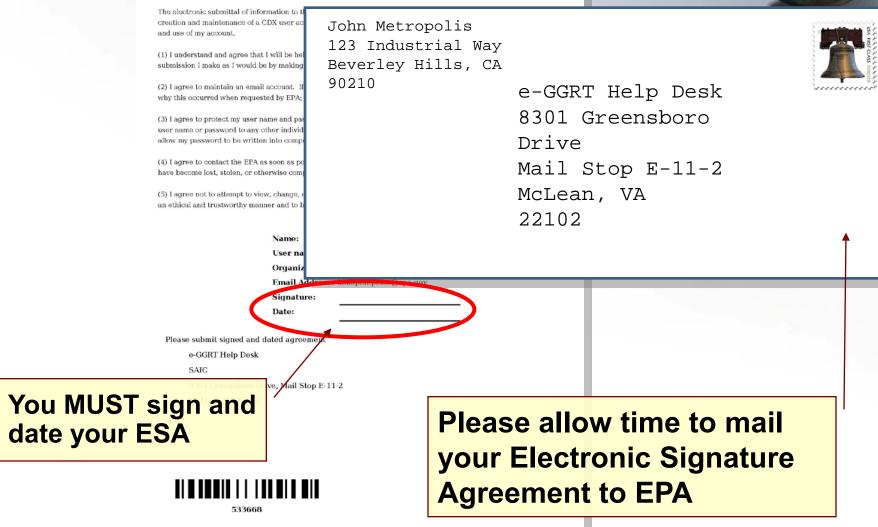


User Registration: Electronic Signature Agreement



User Registration: Electronic Signature Agreement





User Registration: Electronic Signature Agreement Approved!





Notifications from e-GGRT will be sent to the email address in your user profile.

Make sure your email accepts mail from eggrt@ccdsupport.com

For questions about the GHG Reporting Program or e-GGRT, contact EPA at GHGReporting@epa.gov

A Notice from EPA's electronic Greenhouse Gas Reporting Tool

EPA has received your e-GGRT Electronic Signature Agreement (ESA) form.

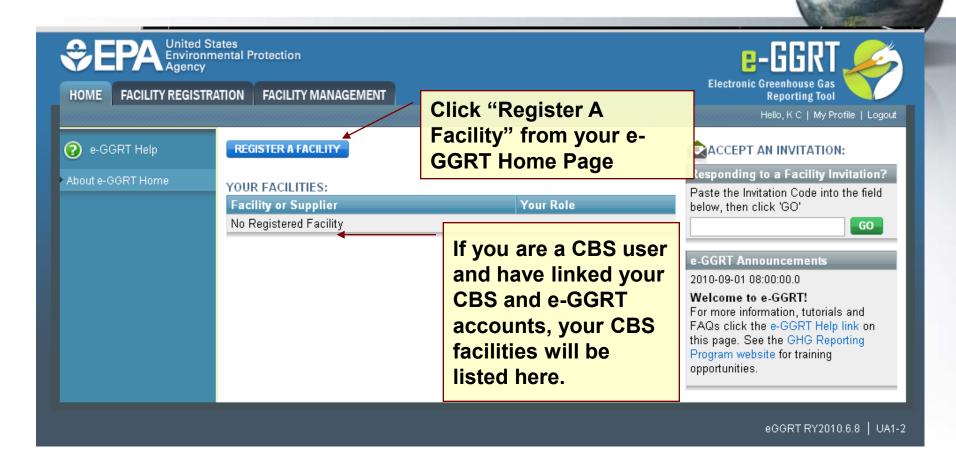
You may now login and begin to use e-GGRT, including registering facilities or suppliers, and accepting e-GGRT invitations to be a Designated Representative or Agent.

If you believe you received this message in error, or have questions, please contact the Help Desk at

Monday through Friday during regular business hours.

20019 21220

Registering A Facility

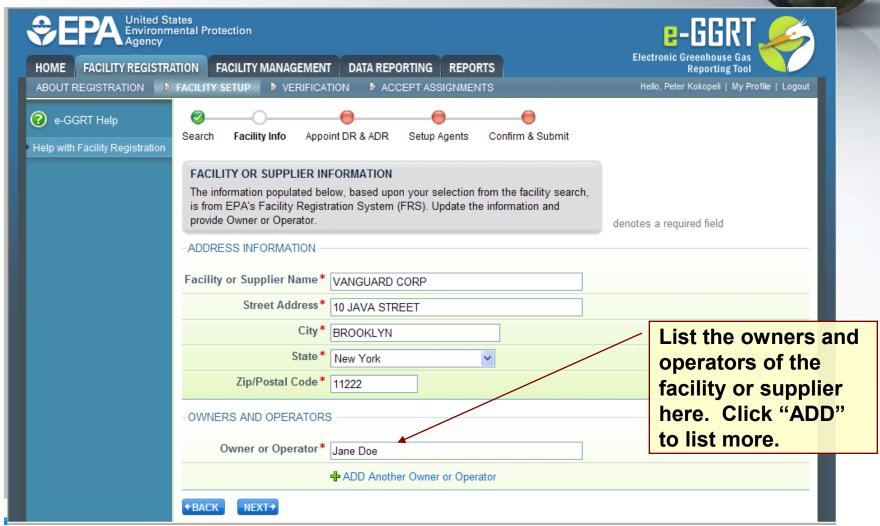


Log-In to e-GGRT at: https://ghgreporting.epa.gov

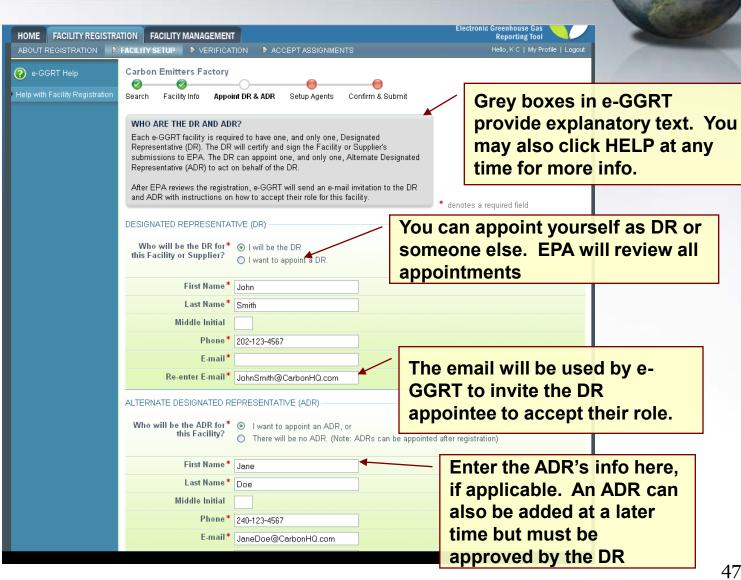
Facility Registration



Facility Registration

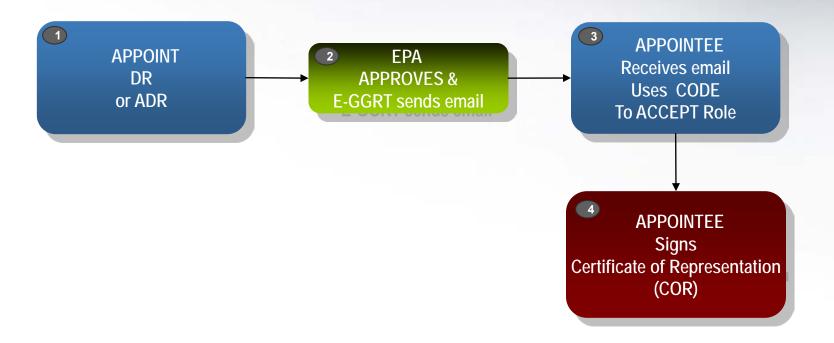


Facility Registration

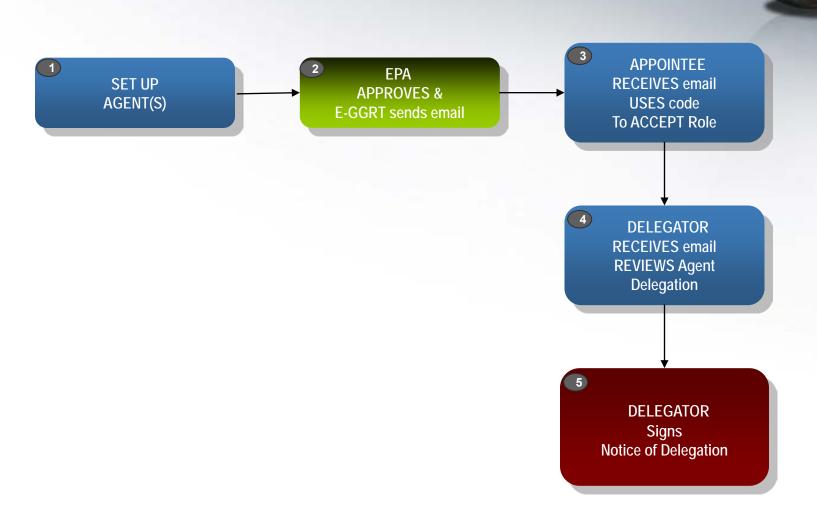


Appointments and Invitations: DR & ADR



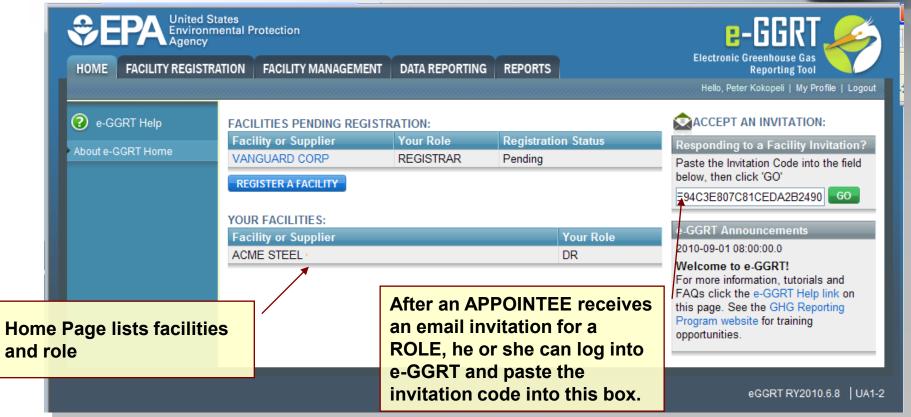


Appointments and Invitations: Agent(s)



Using an Invitation Code



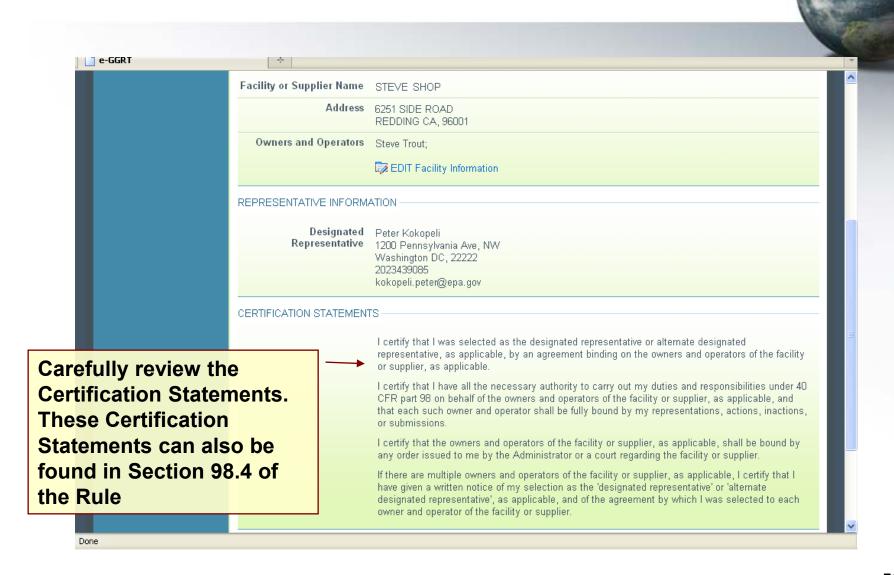


Accepting the Appointment



If you accept the role, you will digitally sign and submit a Certificate of Representation (COR) in the screens that follow. denotes a required field
You have been identified by Peter Kokopeli as the Designated Representative (DR) for: ANYREPORTER 123 Main Street ANYTOWN, USA, ANYZIP
Do you accept this*
If you do not accept, please explain
Peter Kokopeli suggested the following person as your Alternate Designated Representative for this facility: Uncle JOE 202-123-4567 Joe.Uncle@mail.com
Do you confirm the ADR* appointment? No — change the ADR appointment (note, this option only applies when an ADR was appointed) No — do NOT appoint an ADR at this time
NEXT*

Certificate of Representation



e-GGRT Support



 E-GGRT Help Desk will be able to answer questions and provide support to e-GGRT users

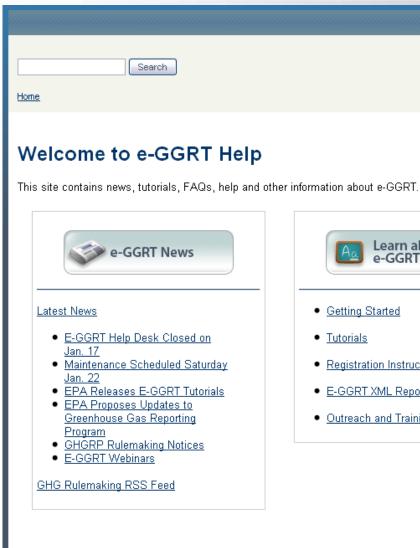
• Telephone: 1-877-444-1188

• Email: GHGREPORTING@epa.gov [e-GGRT]

• URLs: www.ccdsupport.com [Help]
https://ghgreporting.epa.gov [e-GGRT]

e-GGRT Help Site www.ccdsupport.com









For more information



On the GHG Reporting Program:

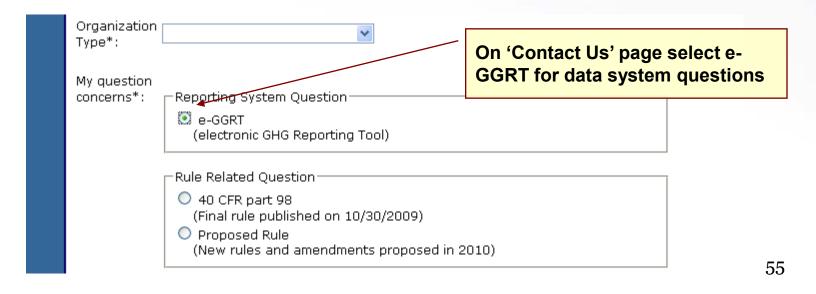
http://www.epa.gov/ghgreporting/reporters/index.html

On the GHG Data System:

http://www.ccdsupport.com

Contact Us:

http://www.epa.gov/ghgreporting/contactus.html





Questions?