

PRIVACY IMPACT ASSESSMENT

(Rev. 2/2020)

(All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official.

All entries must be Times New Roman, 12pt, and start on the next line.

If you need further assistance, contact your LPO. A listing of the LPOs can be found here:

https://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO%20Roster.docx

System Name: Electronic Greenhouse Gas Reporting Tool (e-GGRT)	System Owner: Kong Chiu
Preparer: Jennifer Bohman	Office: OAR/OAP/CCD/Greenhouse Gas Reporting Branch
Date: 10/4/2021	Phone: 202.343.9548
Reason for Submittal: New PIA <input type="checkbox"/> Revised PIA <input checked="" type="checkbox"/> Annual Review <input type="checkbox"/> Rescindment <input type="checkbox"/>	
This system is in the following life cycle stage(s):	
Definition <input type="checkbox"/> Development/Acquisition <input checked="" type="checkbox"/> Implementation <input checked="" type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
Note: New and Existing Systems require a PIA annually, when there is a significant modification to the system or where privacy risk has increased to the system. For examples of significant modifications, see <u>OMB Circular A-130, Appendix 1, Section (c) (1) (a-f).</u>	
The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u>OMB Circular No. A-123, Section VII (A) (pgs. 44-45).</u>	

Provide a general description/overview and purpose of the system:

The e-GGRT application is a web-based reporting system that supports implementation of the Greenhouse Gas Reporting Program (GHGRP) under 40 CFR Part 98. Under the Program, suppliers of fossil fuels or industrial greenhouse gases (GHGs) as well as facilities that emit greenhouse gases above certain thresholds are required to use the e-GGRT tool to electronically submit annual reports to the EPA. The system is used by more than 8,000 facilities and suppliers to fulfil this regulatory requirement each year. More information can be found at: <http://www.epa.gov/ghgreporting/>.

The e-GGRT application will also support the implementation of the reporting requirements for the phasedown of hydrofluorocarbons beginning in the fall 2021 under the authority of the American Innovation and Manufacturing (AIM) Act. For this program, 100s of reporters will submit AIM data (as required under

40 CFR Part 84) using the e-GGRT system. Once the AIM data is submitted to EPA through e-GGRT, the AIM data will be then passed to the EPA's ODSTS system where program implementation activities will occur. More information on this program can be found at: <https://www.epa.gov/climate-hfcs-reduction/aim-act>.

The e-GGRT application is implemented under the Office of Air and Radiation's (OAR) Office of Atmospheric Programs (OAP) by the Climate Change Division (CCD). The e-GGRT application is hosted by EPA at the National Computing Center (NCC) and is integrated with the Central Data Exchange (CDX) for user authentication. The application was launched in 2010 and is in the operation and maintenance phase, with significant new development to address regulatory changes. Beginning in late 2021, the e-GGRT application will begin to collect AIM data.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or Executive Order(s) permit and define the collection of information by the system in question?

The Greenhouse Gas Reporting Program, including the specific data reporting requirements, is defined at 40 CFR Part 98. The Program is authorized by Sections 114 and 208 of the Clean Air Act. For more information regarding the legal authority for the program, see 74 FR 56260.

The AIM data reporting requirements are specified at CFR Part 84. The program is authorized under the American Innovation and Manufacturing (AIM) Act of 2020 outlined in Section 103 in Division S, Innovation for the Environment, of the Consolidated Appropriations Act, 2021.

1.2 Has a system security plan been completed for the information system(s) supporting the system? Does the system have or will the system be issued an Authorization-to-Operate? When does the ATO expire?

A system security plan (SSP) is in place for the e-GGRT system. The system has been issued and ATO. The current ATO expires on 1/28/2022.

1.3 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

For the Greenhouse Gas Reporting Program, the OMB Control Number is 2060-0629, and the expiration date is March 31, 2024.

For the AIM data, the OMB ICR Number is 2060-XXXX, and the ICR is under review.

1.4 Will the data be maintained or stored in a Cloud? If so, is the Cloud Service Provider (CSP) FedRamp approved? What type of service (PaaS, IaaS, SaaS, etc.) will the CSP provide?

No. The e-GGRT system is hosted at NCC.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

2.1 Identify the information the system collects, uses, disseminates, or maintains (e.g., data elements, including name, address, DOB, SSN).

The e-GGRT system collects the following types of information:

User Registration Data: To access the e-GGRT system, users must first register as users by providing identifying information including the individuals name, business address, business phone, and email address and completing an Electronic Signature Agreement (ESA).

Once registered as a user, users can register facilities and then submit annual GHG reports for those facilities.

Facility Registration Data: To register a facility, under 40 CFR 98.4, facilities must submit a Certificate of Representation (COR) and may elect to submit a Notice of Delegation (NOD). These submissions include the name, organization name (company affiliation-employer), business address, e-mail address (if any), business telephone number, and facsimile transmission number (if any) of the designated representative, any alternate designated representatives, and any agents for the facility.

Annual Report Data: Once a facility is registered, users may use the e-GGRT system to prepare and submit their annual GHG reports to EPA. The contents of the annual GHG report vary by sector and by the monitoring methods used by each facility/supplier. In general, the annual report contains information on the facility/supplier location, facility type, measurement methods, GHG emissions data, and GHG supply data. The complete list of data elements collected can be found under 40 CFR Part 98.

AIM Data: Users can submit data reports on production, import, export, transformation, destruction, and reclamation of chemicals regulated under AIM. Users also use the system to submit requests for additional consumption allowances, petitions to import materials, and allowance trades. The complete list of data elements collected can be found under 40 CFR Part 84.

2.2 What are the sources of the information and how is the information collected for the system?

The user registration data (i.e., name, organization name, business address, business phone, and email address) can only be entered by the user.

The facility registration and annual report data can be entered by any one of the individuals listed on the COR or NOD for that facility.

2.3 Does the system use information from commercial sources or publicly available data? If so, explain why and how this information is used.

No. The system collects information directly from the users.

2.4 Discuss how accuracy of the data is ensured.

The e-GGRT system enforces minimum data validation rules for this information on individuals. The system requires that all fields are complete (except for fax numbers) and includes validations for these fields (i.e. ensures that the correct number of numeric digits are entered in fields meant for telephone number, etc.).

Users can access, update, and correct their information (e.g., business address, phone, etc.) as needed.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Discuss the privacy risks identified for the specific data elements and for each risk explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

Privacy Risk: None

Mitigation: Information is collected directly from the individuals. The e-GGRT system uses data validation rules to ensure that the data is complete and matches expected formats. Individuals can update their information as needed.

Section 3.0 Access and Data Retention by the System

The following questions are intended to outline the access controls for the system and how long the system retains the information after the initial collection.

3.1 Do the systems have access control levels within the system to prevent authorized users from accessing information they don't have a need to know? If so, what control levels have been put in place? If no controls are in place why have they been omitted?

The e-GGRT application has access controls built into the software that prevent users or unauthorized personnel from accessing information they do not have a need to know. All access controls are documented in the e-GGRT System Security Plan (SSP).

Without a user account, the only feature publicly available is the User Registration Module. All other access requires authentication. Following authentication, access to data requires the proper permission/roles as described below (i.e. access to data is role-based).

The default role is the "data owner" role. This is the role used to submit annual reports for facilities. Note that, more than one individual can access data for the same facility. In that case, the Designated Representative is responsible for determining which Alternative Designated Representative or Agent(s) can access the facility data, as per 40 CFR 98.4. These access rules are formalized in the COR or NOD described under section 2.1 above.

EPA and EPA contractor users may receive the "Data Analyst" role that provide access to the "EPA Report" tab, which includes data for all facilities, including CBI. As this access includes CBI, this

role is approved by the CBI Administrator per the terms described in the GGRB CBI Policy. Note that there are other access controls on this area of the application in addition to the role-based control.

EPA and EPA contractors may also be given the “Help Desk” role.

3.2 In what policy/procedure are the access controls identified in 3.1, documented?

All access controls are documented in the e-GGRT System Security Plan (SSP).

3.3 Are there other components with assigned roles and responsibilities within the system?

No.

3.4 Who (internal and external parties) will have access to the data/information in the system? If contractors, are the appropriate Federal Acquisition Regulation (FAR) clauses included in the contract?

Aside from the facilities themselves, EPA and EPA contractors may have access to the data. The FAR clauses are not included in the contract.

3.5 Explain how long and for what reasons the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number.

The e-GGRT system was launched in 2010, and GGRB currently retains records in the system indefinitely. This historical data is used to support program implementation. There is no records schedule specific to the e-GGRT system. The program is researching a retention schedule that meets programmatic and regulatory needs as well as CROMERR compliance. Note that while the e-GGRT database maintains records indefinitely, only the current privacy data is ever displayed to users within the system.

3.6 Privacy Impact Analysis: Related to Retention

Discuss the risks associated with the length of time data is retained. How were those risks mitigated? The schedule should align the stated purpose and mission of the system.

Privacy Risk: There are no identified privacy risks related to information retention or the unauthorized use/access of privacy data.

Mitigation: Access to and use of privacy data is strictly controlled through account privileges and policies. External users cannot access privacy data across the program. An individual external user can only access his/her own privacy data for account maintenance. The data is retained as long as it is current. Under 40 CFR Part 98, facility representatives are required to update the roles/privacy data at the facility as needed. These changes are reviewed/approved by the individuals themselves. Internal users (EPA, including trained, authorized contractors) can only access privacy

data if they have a need to know as part of their assigned job responsibilities. Internal users can only access the data through a controlled environment (e.g. CBI VDI). The privacy data cannot be downloaded from the CBI VDI environment. Access privileges to the CBI VDI are reviewed at a minimum of once per year and more often as appropriate.

Section 4.0 Information Sharing

The following questions are intended to outline the access controls for the system and how long the system retains the information after the initial collectio

4.1 Is information shared outside of EPA as part of the normal agency operations? If so, identify the organization(s), how the information is accessed and how it is to be used, and any agreements that apply.

EPA publishes annual GHG report data to the GHGRP Data Publication Website (ghgdata.epa.gov) that provides data (except for CBI) to the public. The annual GHG report data contain information on facility location, facility type, and details on the GHG emissions at the facility for the year. No data related to individuals is released to the public or shared outside of EPA.

No AIM data will be published or shared outside of the EPA. The AIM data will be transferred to EPA's ODSTS where data handling decisions will be made (see ODSTS PIA).

4.2 Describe how the external sharing is compatible with the original purposes of the collection.

Data collected under the Greenhouse Gas Reporting Program must be available to the public unless the data qualify for confidential treatment under the Clean Air Act. GHGRP determines which data will be protected as confidential business information (CBI) through rulemakings and other actions. For more information see: <https://www.epa.gov/ghgreporting/confidential-business-information-ghg-reporting>

Regarding privacy data, GHGRP does not publish any of the privacy data collected under the program.

No AIM data will be published or shared outside of the EPA. The AIM data will be transferred to EPA's ODSTS where data handling decisions will be made (see ODSTS PIA).

4.3 How does the system review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within EPA and outside?

GGRB does not have information sharing agreements or MOUs and does not grant access to the system by organizations outside of EPA.

4.4 Does the agreement place limitations on re-dissemination?

GGRB does not share or publish ANY data related to individuals (PII).

4.5 Privacy Impact Analysis: Related to Information Sharing

Discuss the privacy risks associated with the sharing of information outside of the agency. How were those risks mitigated?

Privacy Risk:

There is a low risk of inappropriate information sharing.

Mitigation:

There is adequate control in place to prevent unauthorized sharing.

Section 5.0 Auditing and Accountability

The following questions are intended to describe technical and policy-based safeguards and security measures.

5.1 How does the system ensure that the information is used as stated in Section 6.1?

Section 6.1 describes how the e-GGRT system uses the user registration data and the facility registration data to create user accounts and control access to facility data. The GHGRP conducts extensive testing in advance of the annual e-GGRT software release to ensure that the e-GGRT software is correctly executing all required functions.

Section 6.1 also describes how the GHGRP verifies and published facility level data. The GHGRP monitors progress towards these annual verification and publication goals using various internal, automated reports. GHGRP also reports out on the completion of these task in the business plan each year.

5.2 Describe what privacy training is provided to users either generally or specifically relevant to the system/collection.

All users of the e-GGRT application must read, acknowledge, and adhere to the system Rules of Behavior. All EPA users must complete annual security and privacy awareness training. In addition, EPA users who are given the data analyst role must also complete the annual GHGRP CBI Training.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

Low risk of untimely audit.

Mitigation:

There is yearly report system in place. Data in the e-GGRT system is protected by the policies and controls documented in the e-GGRT System Security Plan and the GHGRP CBI Policy. Access to privacy data is role-based; the roles that grant access to privacy data

are reviewed at a minimum of once per year and more often as appropriate. These roles can only be assigned when certain conditions are met. All users must sign the Rules of Behavior and users with privileges to access privacy data must complete additional training and agree to abide by the GHGRP CBI Policy.

Section 6.0 Uses of the Information

The following questions require a clear description of the system's use of information.

6.1 Describe how and why the system uses the information.

Regarding user registration data, the e-GGRT system uses the data to create the e-GGRT ESA (electronic signature agreement) required under CROMERR. The ESA lists the user's name, organization and email address. Users must complete the ESA before being granted access to e-GGRT. Note that the user registration process is integrated with CDX via web services.

Regarding facility registration data, the submission of this data is required under 40 CFR 98.4. The e-GGRT system uses this information on the COR and NOD to control access to facility data so that only the individuals listed on the COR or NOD for a facility are granted access to data for that facility.

Regarding the annual report data, the GHGRP verifies submissions for accuracy and then published data (except for data eligible for confidential treatment) to the EPA website.

For AIM data, the e-GGRT system will collect the data. Once collected, the data will be passed to the ODSTS system, where program implementation activities will occur. Most of the information transferred will include reports that track chemical specific production, import, destruction, etc. as required by the regulation, but it may also include the name of the company representative who submitted each report.

6.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes__ No_X_. If yes, what identifier(s) will be used. (A personal identifier is a name, social security number or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual. Or any identifier that can be linked or is linkable to an individual.)

No. Users retrieve data by facility name or facility ID. For internal EPA data analyst, data is sorted by facility name, facility identification number, reporting sector, reporting year, or reporting status. Help Desk agents can trouble shoot issues with individual e-GGRT account by searching on the e-GGRT username.

6.3 What type of evaluation has been conducted on the probable or potential effect of the privacy of individuals whose information is maintained in the system of records?

All information collected in the e-GGRT system is established through notice and comment rulemaking and codified at 40 CFR Part 98 and 40 CR Part 84.

For more information on these actions, see: <https://www.epa.gov/ghgreporting/historical-rulemakings>

The e-GGRT system uses role-based access controls to limit the data that each user can access.

- For external users (ie. “reporters), the user can only see information that they have entered themselves. They cannot see any other user’s information.
- Internal EPA users can be granted a “data analyst” role to view information across facilities. However, EPA users are only granted this role if they have a need to know, have completed training, and have signed a policy acknowledgement form. Once these steps are complete, the EPA users are only given access to data necessary for their role. Finally, EPA users can only use the “data analyst” role when they are logged onto the CBI VDI; they cannot transfer data out from the CBI VDI.

6.4 Privacy Impact Analysis: Related to the Uses of Information

Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above.

Privacy Risk:

Low risk of data misuse.

Mitigation:

There are appropriate controls in place to prevent misuse of information.

***If no SORN is required, STOP HERE.**

The NPP will determine if a SORN is required. If so, additional sections will be required.

Section 7.0 Notice

The following questions seek information about the system’s notice to the individual about the information collected, the right to consent to uses of information, and the right to decline to provide information.

7.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

7.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the collection or sharing of their information?

7.3 Privacy Impact Analysis: Related to Notice

Discuss how the notice provided corresponds to the purpose of the project and the stated uses. Discuss how the notice given for the initial collection is consistent with the stated use(s) of the information. Describe how the project has mitigated the risks associated with potentially insufficient notice and opportunity to decline or consent.

Privacy Risk:

Mitigation:

Section 8.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

8.1 What are the procedures that allow individuals to access their information?

8.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are described in EPA's Privacy Act regulations at 40 CFR part 16.

8.3 Privacy Impact Analysis: Related to Redress

Discuss what, if any, redress program the project provides beyond the access and correction afforded under the Privacy Act and FOIA.

Risk:

Mitigation: