ANNEX 9 Use of EPA Greenhouse Gas Reporting Program in Inventory

This Annex provides background information on the Greenhouse Gas Reporting Program (GHGRP) and its relationship to this Inventory. The U.S. Environmental Protection Agency (EPA) tracks U.S. greenhouse gas emissions through two complementary programs: the Inventory (estimates in this report), and the GHGRP. The Inventory provides a comprehensive accounting of all emissions from source categories identified in the 2006 IPCC Guidelines needed to understand the United States' total net greenhouse gas emissions in line with the UNFCCC reporting guidelines, while the GHGRP provides bottom-up detailed information that helps improve understanding of the sources and types of greenhouse gas emissions at individual facilities and suppliers. The GHGRP provides facility-level greenhouse gas data from major industrial sources across the United States; it does not provide full coverage of total annual U.S. greenhouse

11 gas emissions (e.g., the GHGRP excludes emissions from the agricultural, land use, and forestry sectors).

12 On October 30, 2009, the EPA published a regulation requiring annual reporting of greenhouse gas data from large

13 facilities²¹⁸ in the United States. The program implementing the regulation, codified at 40 CFR Part 98, is referred to as

14 EPA's Greenhouse Gas Reporting Program (GHGRP). The GHGRP covers sources or suppliers in 41 industrial categories

15 ("Subparts"²¹⁹), including direct greenhouse gas emitters,²²⁰ fossil fuel suppliers, industrial gas suppliers, and facilities

that inject carbon dioxide (CO₂) underground for sequestration or other reasons.²²¹ In general, the threshold for

17 reporting is 25,000 metric tons or more of CO₂ Eq. per year.²²²

18 Facilities in most source categories subject to the GHGRP began collecting data in 2010 while additional types of

19 industrial operations began collecting data in 2011. Currently, more than 8,000 facilities and suppliers are required to

20 report their data annually. Facilities calculate their emissions using methodologies that are specified at 40 CFR Part 98,

and they report their data to EPA using the electronic Greenhouse Gas Reporting Tool (<u>e-GGRT</u>). Annual reports covering emissions from the prior calendar year are due by March 31st of each year. EPA verifies reported data through a multi-

22 step process to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.

All reports submitted to EPA are evaluated by electronic validation and verification checks, including industry-specific

checks. If potential errors are identified, EPA will notify the reporter, who can resolve the issue either by providing an

acceptable response describing why the flagged issue is not an error or by correcting the flagged issue and resubmitting

27 their annual greenhouse gas report.²²³

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The reported data are made available to the public each fall. EPA presents the data collected by its GHGRP in a number

of ways, such as through a data publication tool known as the Facility Level Information on GHGs Tool (FLIGHT). FLIGHT

allows data to be viewed in several formats including maps, tables, charts and graphs for individual facilities or groups of

facilities.²²⁴ More information on EPA's GHGRP can be found at <u>https://www.epa.gov/ghgreporting</u>.

²²⁰ Data reporting by affected facilities includes the reporting of emissions from fuel combustion at that affected facility.

²²¹ See <u>https://www.epa.gov/ghgreporting/resources-subpart-ghg-reporting</u> and <u>http://ghgdata.epa.gov/ghgp/main.do</u>.

²¹⁸ Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases (i.e., reporting at the corporate level).

²¹⁹ See <u>https://www.epa.gov/ghgreporting/resources-subpart-ghg-reporting</u>.

²²² For some industrial categories ("Subparts") under the GHGRP, facilities must report if their combined emissions from stationary fuel combustion and all applicable source categories are above a given threshold (e.g., 25,000 metric tons CO₂ Eq. or more per year or another industry-specific threshold). For other source categories, new facilities must report regardless of their quantity of annual emissions. These categories include, for example, cement production (Subpart H) and aluminum production (Subpart F). However, any facility regardless of threshold can cease reporting if its emissions fall below 25,000 metric tons CO₂ Eq. for five years or below 15,000 metric tons CO₂ Eq for three years, and it informs EPA of its intention to cease reporting and the reason(s) for any reduction in emissions. See 40 CFR 98.2(a), 98.2(i), and Tables A-3, A-4, and A-4 for more information.

^{07/}documents/ghgrp_verification_factsheet.pdf.

²²⁴ See <u>http://ghgdata.epa.gov</u>.

The GHGRP dataset is an important resource for the Inventory. EPA uses GHGRP data in a number of categories to 2 improve the national estimates, consistent with IPCC guidance, as summarized in Table A-246 below. Methodologies 3 used in the GHGRP are consistent with methods in 2006 IPCC Guidelines, in particular "higher tier" methods which 4 include collecting facility or plant-specific measurements. The GHGRP provides not only annual emissions information for 5 reporting facilities and suppliers, but also other annual information, such as activity data and emission factors that can 6 be used to improve and refine national emission estimates and trends over time. GHGRP data also allow EPA to 7 disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories 8 of emissions, along with enhancing application of QA/QC procedures and assessment of uncertainties. Consistent with 9 considerations outlined in the Technical Bulletin 1 on Use of Facility-Specific Data in National Greenhouse Gas Inventories 10 from the IPCC Task Force on National Greenhouse Gas Inventories (IPCC 2011),²²⁵ EPA has paid particular attention both 11 to ensuring completeness in national coverage of emission estimates over time and to ensuring time-series consistency 12 by recalculating emissions for 1990 to 2010/2011 when incorporating GHGRP data into source category estimates.²²⁶ 13 These issues are discussed further in the chapters where source category emissions estimates use GHGRP data. Source 14 category definitions are also considered in order to ensure completeness when using GHGRP data. For certain source 15 categories in the Industrial Processes and Product Use chapter, EPA has relied on data values that have been calculated 16 by aggregating GHGRP data that are considered confidential business information (CBI) at the facility level. EPA, with 17 industry engagement, has put forth criteria to confirm that a given data aggregation shields underlying CBI from public 18 disclosure. EPA is only publishing data values that meet these aggregation criteria.²²⁷ Specific uses of aggregated facility-19 level data that are CBI are described in the respective methodological sections in Chapter 4 of the Inventory. Beyond the 20 current uses, EPA continues to analyze the GHGRP data on an annual basis to identify other source categories where it 21 could be further integrated in future editions of this report (see the Planned Improvement sections of those specific

22 source categories for details).

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²²⁵ IPCC Task Force on National Greenhouse Gas Inventories (TFI) (2011). Technical Bulletin 1: Use of Facility-Specific Data National Greenhouse Gas Inventories. Available at https://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf. ²²⁶ See <u>http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf</u>. ²²⁷U.S. EPA Greenhouse Gas Reporting Program. Confidential Business Information GHG Reporting. See

http://www.epa.gov/ghgreporting/confidential-business-information-ghg-reporting.

1 Table A-246: Summary of EPA GHGRP Data Use in U.S. Inventory

Inventory Category	GHGRP Industry Subpart	Initial Calendar Year of Reporting under GHGRP	Reporting Threshold ²²⁸		National			
				Emissions or Quantity Supplied	Emission Factor (EF)	Activity Data (AD)	QA/QC 229	Inventory Report (NIR) Section with details on data use
			Energy Sector	I	I	I	I	
Fossil Fuel Combustion: Industrial Sector	C – General Stationary Fuel Combustion Sources	2010	Y	•				Section 3.1 and Box 3-4
Coal Mining: Underground Mines	FF – Underground Coal Mines	2011	Y	•			•	3.4
Petroleum Systems	W – Petroleum and Natural Gas Systems; Y – Petroleum Refineries	2010, 2011	Y, N	•	•	•	•	3.6
Natural Gas Systems	W – Petroleum and Natural Gas Systems	2011	Y		•	•	•	3.7
Waste Incineration	C – General Stationary Fuel Combustion Sources	2010	Y			•		3.3
		Industrial Proce	esses and Produ	ct Use Sector				L
Cement Production	H – Cement Production	2010	N			•	•	4.1
Lime Production	S – Lime Production	2010	N	•				4.2
Glass Production	N – Glass Production	2010	Y			•		4.3

²²⁸ Y=25,000 MTCO₂ Eq., or industry-specific threshold other than 25,000 MTCO₂ Eq.; N = all facilities in industry category must report regardless of annual emissions. Information on industry-specific threshold and implications of the reporting threshold or lack of threshold in estimating national greenhouse gas emissions is discussed in the respective source category methodology sections.

²²⁹ Consistent with IPCC good practices, QA/QC using GHGRP may not be appropriate if this is the primary data source for estimating emissions. Depending on use, other data sets may be more appropriate for QA/QC of Inventory estimates.

Inventory Category	GHGRP Industry Subpart	Initial Calendar Year of Reporting under GHGRP	Reporting Threshold ²²⁸		National			
				Emissions or Quantity Supplied	Emission Factor (EF)	Activity Data (AD)	QA/QC 229	Inventory Report (NIR) Section with details on data use
Ammonia Production	G – Ammonia Manufacturing	2010	N	•		•		4.5
Urea Consumption from Non-Agricultural Use	G – Ammonia Manufacturing	2010	N			•		4.6
Nitric Acid Production	V – Nitric Acid Production	2010	N	•	•	•		4.7
Adipic Acid Production	E – Adipic Acid Production	2010	N	•				4.8
Petrochemical Production	X – Petrochemical Production	2010	N	•	•	•		4.13
HCFC-22 Production	O – HCFC-22 Production and HFC-23 Destruction	2010	Y	•				4.14
Carbon Dioxide Consumption	PP – Suppliers of Carbon Dioxide	2010	Y	•				4.15
Iron and Steel Production and Metallurgical Coke Production	Q – Iron and Steel Production	2010	Y	•				4.17
Aluminum Production	F – Aluminum Production	2010	N	•				4.19
Magnesium Production and Processing	T – Magnesium Production	2011	Y	•				4.20
Lead Production	R – Lead Production	2010	Y				•	4.21
Electronics Industry	I – Electronics Manufacturing	2011	Y	•				4.23

Inventory Category	GHGRP Industry Subpart	Initial Calendar Year of Reporting under GHGRP	Reporting Threshold ²²⁸	Type of GHGRP Data Use				National Inventory
				Emissions or Quantity Supplied	Emission Factor (EF)	Activity Data (AD)	QA/QC 229	Report (NIR) Section with details on data use
Substitution of ODS	OO – Suppliers of Industrial Gases; QQ – Imports and Exports of Equipment Pre–charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed–cell Foams	2010, 2011	N (producers) Y (all others)				•	4.24
Electrical Transmission and Distribution	DD – Use of Electric Transmission and Distribution Equipment; SS – Manufacture of Electric Transmission and Distribution Equipment	2011	Y	•	•	•		4.25
			Waste Sector					
MSW Landfills	HH – Municipal Solid Waste Landfills	2010	Y	•	•		•	7.1
Industrial Landfills	TT – Industrial Waste Landfills	2011	Y				•	7.1
Industrial Wastewater	II – Industrial Wastewater Treatment	2011	Y				•	7.2