

ftc&h USEPA Greenhouse Gas Reporting Rule

GHG Reporting Rule Overview

- The reporting threshold is 25,000 metric tons of CO₂e, unless it is a mandatory source category (see next page).
- Reporting is required at the facility level, except for certain suppliers of industrial GHGs, suppliers of fossil fuels, and vehicle and engine manufacturers that will report on a corporate level.
- The first emissions report is due March 31, 2011, except for certain vehicle and engine manufacturers.
- Reports will be submitted electronically through the EPA's reporting tool.
- No third-party verification will be required - the report must be signed by a designated representative of the owner/operator.
- Selected source categories will require CO₂ continuous emission monitoring systems.
- A GHG monitoring plan is required by April 1, 2010.
- Simplified reporting requirements for facilities with stationary combustion units only.
- There are off-ramps to cease reporting if annual emissions fall below 25,000 metric tons CO₂e.

On October 29, 2009, the EPA published a new mandatory greenhouse gas (GHG) reporting rule adding new requirements for selected industrial facilities and stationary combustion units. Starting January 1, 2010, facilities that emit 25,000 tons or more of carbon dioxide equivalent CO₂e will be required to collect GHG data to prepare the first annual report due March 31, 2011.

Fishbeck, Thompson, Carr & Huber, Inc.'s air quality professionals can help you comply with this new rule. Our services include:

- Rule applicability analysis
- Source inventory
- Emissions calculations
- Notification requirements
- Review current data collection and record keeping systems to determine needed changes
- Assistance with monitoring systems
- Development of a compliance plan
- Preparation of GHG monitoring plans
- GHG reduction strategies

The annual GHG emissions report must include:

- Total facility CO₂e emissions
- Total facility biogenic CO₂ emissions
- Breakdown of each GHG from each source category
- Additional information as required in the individual subparts

The EPA's GHG Reporting Rule is built upon existing inventory protocols and guidance documents. If your facility is already reporting GHG emission inventories under a voluntary program, closely examine the GHG reporting rule to ensure that you are following the EPA-required protocols.

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engineers

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architects

constructors

Does my facility or source category have to report?

What is CO₂e?

All GHGs are calculated separately and converted to a carbon dioxide equivalent (CO₂e) on the basis of their global warming potential (GWP). For instance, the GWP of CH₄ is 21 times that of CO₂ and the GWP for N₂O is 310 times that of CO₂.

The EPA requires that the greenhouse gases covered by the United Nations Framework Convention on Climate Change (UNFCCC) be included in the emissions report:

- Carbon Dioxide – CO₂
- Methane – CH₄
- Nitrous Oxide – N₂O
- Hydrofluorocarbons - HFCs
- Perfluorochemicals - PFCs
- Sulfur Hexafluoride – SF₆

Table 2

If you emit 25,000 metric tons of CO₂e or more in aggregate emissions from the following source categories, plus emissions from stationary combustion units and miscellaneous carbonate use:

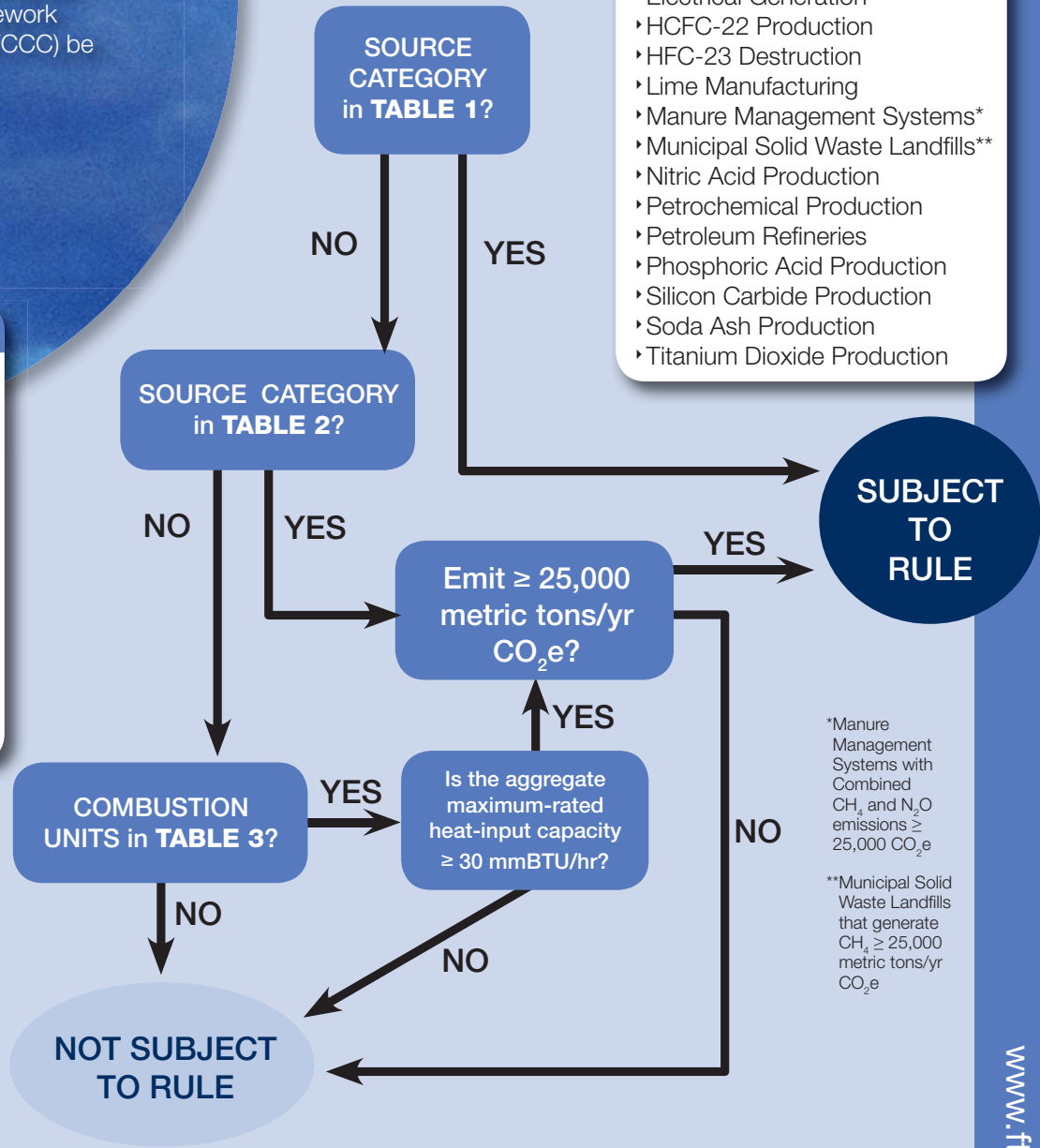
- Ferroalloy Production
- Glass Production
- Hydrogen Production
- Iron & Steel Production
- Lead Production
- Pulp and Paper
- Zinc Production

Table 3

If you have stationary combustion units for industrial, commercial, or institutional use with an aggregate maximum-rated heat-input capacity of 30 mmBTU and emit 25,000 metric tons or more of CO₂e, excluding the CO₂ emissions from biogenic fuels.

Table 1

- Mandatory Source Categories:
- Adipic Acid Production
 - Aluminum Production
 - Ammonia Manufacturing
 - Portland Cement
 - Electrical Generation
 - HCFC-22 Production
 - HFC-23 Destruction
 - Lime Manufacturing
 - Manure Management Systems*
 - Municipal Solid Waste Landfills**
 - Nitric Acid Production
 - Petrochemical Production
 - Petroleum Refineries
 - Phosphoric Acid Production
 - Silicon Carbide Production
 - Soda Ash Production
 - Titanium Dioxide Production



*Manure Management Systems with Combined CH₄ and N₂O emissions ≥ 25,000 CO₂e

**Municipal Solid Waste Landfills that generate CH₄ ≥ 25,000 metric tons/yr CO₂e

If you would like more information on the GHG reporting rule, please call Ms. Kay Bedenis, P.E., CEM, CHMM at 248.324.2128.

Additional information can be found at the EPA's website: <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

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