

ARS Compliance Tip of the Month

February 3, 2010

Complying with EPA's Mandatory Reporting of Greenhouse Gases Rule

On September 22, 2009, the EPA issued a final rule for a national mandatory greenhouse gas (GHG) emissions reporting program that will cover approximately 10,000 facilities. The Final Mandatory Reporting of Greenhouse Gases Rule was published in the Federal Register on October 30, 2009.



In general, the threshold for reporting is 25,000 metric tons or more of carbon dioxide equivalent (CO₂e) per year. EPA expects most small businesses will not be required to report GHG emissions. Applicability for facilities is determined by either "all-in" or "threshold" source categories. The rule finalized reporting requirements for 31 source categories, and it is expected the 11 source categories that were not included in the final rule will be added at some time in the future.

Although some facilities will not be subject to the rule for the "all-in" or "threshold" source categories, many will end up being required to report under Subpart C (Stationary Fuel Combustion Sources), for combustion sources such as boilers, stationary combustion engines, process heaters, thermal oxidizers, dryers, etc. Any facility emitting more than 25,000 metric tons of CO₂e per year from stationary fuel combustion must report these emissions. Only facilities that have an aggregate maximum rated heat input, from all units, of less than 30 MMbtu/hr are exempt from Subpart C (assuming full utilization and 8,760 hours/yr). However, equipment exempt from the rule includes portable equipment, emergency generators, emergency equipment, agricultural irrigation pumps, and flares (unless otherwise reporting is required by another subpart).

Facilities will need to report total annual GHG emissions as an aggregate, as well as separate emissions data for each source and supply category identified by the EPA. In addition, certain data, including fuel usage, feedstock inputs, etc. employed to complete the GHG emissions calculations would also need to be reported.

The initial GHG report is due on March 31, 2011, for emissions during the 2010 calendar year. Sources subject to the rule need to begin collecting the necessary data for the reports starting January 1, 2010. Any required monitoring methods need to be implemented by March 31, 2010.

Facilities will also need to prepare a written GHG monitoring plan by April 1, 2010. EPA states the plan does not have to be complex and can rely on existing corporate documents like SOPs and monitoring plans developed for compliance with other air programs.

For more information, EPA maintains a webpage for the new rule, which has useful guidance: <http://epa.gov/climatechange/emissions/ghgrulemaking.html>.

JAMES WU

Greenhouse Gas Services Manager

Mr. Wu has over 16 years' experience in air quality compliance and permitting, and has performed hundreds of stationary and mobile source analyses. He specializes in bringing a variety of complex projects through technical review to agency approval. He currently is the greenhouse gas (GHG) services manager and a project manager in the environmental compliance section at Air Resource Specialists, Inc., and provides technical studies and evaluations, and prepares client permit applications and air quality modeling analyses.