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Frequently Asked Questions (FAQs)

Disclaimer - This information is intended to provide general and administrative information about 40 CFR Part 98. It does not represent legal advice. This information does not 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. Facility owners or operators and suppliers are responsible for determining how they would be affected by the requirements of 40 CFR Part 98.



A printer-friendly version of the FAQs (PDF) (69 pp, 486K, [About PDF](#))

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e-GGRT (General)

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Q200. What are e-GGRT system requirements?

The e-GGRT System Requirements are:

- 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 email account

Q201. How do I turn on Javascript in my browser?

You can turn on Javascript in your browser as follows:

For Internet Explorer (7.0)

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

For Mozilla Firefox (3.0)

1. 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

Q202. Will my browser back button work when using e-GGRT?

Yes, but we strongly recommend using the CANCEL or BACK buttons provided.

Q203. Will e-GGRT timeout due to inactivity? When does e-GGRT save?

E-GGRT enforces a ten-minute inactivity timeout. Whenever you click Next or Save your data will be saved with one important exception: during user registration, you must complete your user profile, secret question and answer and challenge questions before the new user account is created.

Q207. I use both CAMD Business System (CBS) and e-GGRT. Which system should I use to update my user or facility profile?

While your CBS and e-GGRT accounts may be linked, they are not synchronized. User profile changes must be made in both CBS and e-GGRT. As of July 16, 2011, Facility profiles are no longer synchronized. Facility name, address, owner, and representation changes should be made in both CBS and e-GGRT. EPA will verify that the Designated Representative (DR) is the same person in both systems.

Q211. I report emissions using ECMPs and CAMD Business System (CBS). Do I also have to submit reports using e-GGRT?

Yes. Part 75 (CBS) reporters need to register their facilities and report Greenhouse Gas Reporting Program (GHGRP) emissions using Part 98. CBS users will be able to import Part 75 facility information from CBS into e-GGRT.

Q212. Do you expect that most current CDX users will become e-GGRT users?

No.

Q213. If I complete user registration in e-GGRT, can I use my e-GGRT user ID and password to log in to CDX?

Yes.

Q218. Does facility data have to be entered manually or can you upload the data

using files?

EPA plans to provide the ability for reporters to upload reporting data using XML. A draft schema for this XML file has been posted at <http://www.epa.gov/climate/climatechange/emissions/data-reporting-system.html>. The XML upload method may be used only for submitting the annual greenhouse gas (GHG) report. User and facility or supplier registration must be entered through e-GGRT web forms.

Q229. What is e-GGRT?

Electronic Greenhouse Gas Reporting Tool (e-GGRT) is a new web-based system EPA is developing to support reporting under the 40 CFR 98 Mandatory Reporting of Greenhouse gases (GHG). It will provide web forms for reporting. It will also offer the ability to submit data using XML.

Q231. When will EPA offer training on e-GGRT?

If you are interested in training opportunities, please visit the EPA website at: <http://www.epa.gov/climatechange/emissions/training.html>

Q232. Will EPA provide the opportunity to review e-GGRT, provide input and beta test?

If you are interested in beta testing, please visit the EPA website at: http://www.epa.gov/climate/climatechange/emissions/ghgrule_contactus.htm

Q233. Do I have to use e-GGRT to report to the Greenhouse Gas Reporting Program (GHGRP)? Are there any source categories that will not use e-GGRT?

Most GHGRP reporters will have to use e-GGRT to register facilities or suppliers and submit both the Certificate of Representation and annual greenhouse gas (GHG) reports. If you are subject only to Subpart LL (Suppliers of Coal-based Liquid Fuels) and/or Subpart MM (Supplier of Petroleum Products) then you must use the OTAQREG system to submit your Certificate of Representation report to EPA for those operations. E-GGRT will not support Subpart LL or MM reporting. However, if your facility or supplier is required to report under any other subpart in addition to LL or MM, (for example, stationary combustion), then you will have to register in e-GGRT and submit a separate Certificate of Representation and annual GHG report for those other subparts under e-GGRT.

Q234. Will e-GGRT and the XML Reporting Schema v1.0 account for reporting requirements proposed or promulgated for reporting year 2011?

No. The e-GGRT XML Reporting Schema v1.0 includes only those data elements that apply to reporting year 2010. Greenhouse gas (GHG) reporting requirements proposed or promulgated for the reporting year 2011 or later will be incorporated into a future version of the reporting schema and e-GGRT.

Q236. During what hours is telephone support available? Will hours be extended during busy times?

The e-GGRT Help Desk offers telephone support from 9-5 Eastern Time. EPA will extend hours around submittal deadlines. Note that telephone support is provided for e-GGRT only. Questions on final rule or proposed rules can be submitted via email: GHGMRR@epa.gov or at the EPA website at http://www.epa.gov/climate/climatechange/emissions/ghgrule_contactus.htm.

Q237. Do Greenhouse Gas Reporting Program (GHGRP) reporters have to submit Monitoring Plans?

GHGRP reporters are required to maintain monitoring plans, but are not required to submit them using e-GGRT. Monitoring Plans are a record keeping requirement, not a reporting requirement.

Q238. Where should I submit rule related questions on Part 98?

Questions on 40 CFR 98 can be submitted via email: GHGMRR@epa.gov or at the EPA website:

http://www.epa.gov/climatechange/emissions/ghgrule_contactus.htm.

Q239. How do I contact the e-GGRT Help Desk?

You can find the e-GGRT Help Site at <http://www.ccdsupport.com>. You can email the e-GGRT Help Desk by email at ghgreporting@epa.gov, or by telephone at 1-877-444-1188 Monday through Friday, 9 a.m. to 5 p.m. Eastern Time.

Q255. What is XML?

The Extensible Markup Language (XML) is a simple text-based format for representing structured information. XML is a standard of the World Wide Web Consortium (W3C). For more information about XML, visit the W3C at <http://www.w3c.org>.

Q268. The ten minute inactivity timeout in e-GGRT makes me nervous. Can I save as I go?

Whenever you click Next or Save your data will be saved with one important exception: during user registration, you must complete your user profile, secret question and answer and challenge questions before the new user account is created.

Q303. Have any of the equations under the GHG reporting rule been revised, or have any new equations been added since the rule was finalized in 2009?

Yes. On October 28, 2010 and December 17, 2010 EPA published final rules that contained amendments to various subparts under 40 CFR part 98. You should review the latest version of 40 CFR part 98 at http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=9415fad5f1c7ea4d940d308e1ea74e11&tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl

If you would like more information on the October 28, 2010 rule, please see <http://www.epa.gov/climatechange/emissions/technical-corrections.html>

If you would like more information on the December 17, 2010 final rule, please see <http://www.epa.gov/climatechange/emissions/technical-corrections.html#revisions>

Q304. When asked in e-GGRT if a unit has a CEMS, is it specifically referring to a CO2 CEMS?

The question is referring to whether CO2 emissions for a given process unit are calculated according to the Tier 4 calculation methodology specified in section 98.33(a)(4). The question is not asking if a Continuous Emission Monitoring System or gas monitor of any kind is being used to monitor pollutant emissions for a given unit.

Q305. Does the information from the Reporting Forms populate e-GGRT fields or are they just uploaded files? If automatically populated, are these values available for review before submitting the report?

The spreadsheet data will not populate e-GGRT fields. The spreadsheets will simply accompany the GHG report that is submitted. You can review the spreadsheets themselves to verify that you have correctly entered the data into them.

Once you have uploaded the spreadsheets, you will be required to enter some summary data into e-GGRT online.

Q306. When will the reporting tools for subparts I, L, T, W, DD, FF, II, QQ, SS, TT, and UU be available?

The first annual GHG reports for these subparts are due in 2012. The reporting tools for these subparts are still under development and will be released at a later date.

e-GGRT Confidential Business Information (CBI)

- Q312. Will the data I submit in e-GGRT be treated as CBI?
- Q313. Can I mark my data as CBI in e-GGRT?
- Q314. Can I designate data as CBI in my XML file?
- Q315. EPA has said that data submitted during the testing period will not be treated as confidential. Is there a risk that data submitted

during testing will be made publicly available?

- Q316. The interim final rule published in December 2010 deferred reporting of inputs until August 31, 2011, but the 2011 reporting deadline is now September 30, 2011. How is this handled in e-GGRT?
- Q317. Are inputs to emission equations being collected in e-GGRT?
- Q318. Should reporters include calculation inputs when they upload XML files?
- Q319. Are reporters required to use the calculation spreadsheets provided by EPA or may they use their own spreadsheets?
- Q320. Should reporters using the calculation spreadsheets submit them to EPA?

Q312. Will the data I submit in e-GGRT be treated as CBI?

The EPA Administrator has signed a final rule that delineates which data submitted in e-GGRT will be treated as CBI and which data elements can be released to the public. EPA will handle data reported in e-GGRT based on these determinations. EPA will not release any data determined to be CBI to the public.

The e-GGRT system does not contain any information on the data entry screens as to whether a particular data element has been determined to be CBI. Reporters can look at the list below to determine if a particular data element will be treated as CBI.

The list of final CBI determinations is available here:

<http://www.epa.gov/climatechange/emissions/downloads11/documents/CBI-final-data-category.pdf> (PDF) (90 pp, 1.8MB, [About PDF](#))

More information on the final CBI rule is available here: <http://www.epa.gov/climatechange/emissions/CBI.html>

Q313. Can I mark my data as CBI in e-GGRT?

No. The EPA Administrator has signed a final rule that delineates which data submitted in e-GGRT will be treated as CBI and which data can be released to the public. EPA will handle data submitted in e-GGRT based on these determinations. Reporters cannot make additional CBI claims in the e-GGRT system.

The e-GGRT system does not contain any information on the data entry screens as to whether a particular data element has been determined to be CBI. Reporters can look at the list below to determine if a particular data element will be treated as CBI.

The list of final CBI determinations is available here:

<http://www.epa.gov/climatechange/emissions/downloads11/documents/CBI-final-data-category.pdf> (PDF) (90 pp, 1.8MB, [About PDF](#))

More information on the final CBI rule is available here: <http://www.epa.gov/climatechange/emissions/CBI.html>

Q314. Can I designate data as CBI in my XML file?

No. The EPA Administrator has signed a final rule that delineates which data submitted in e-GGRT will be treated as CBI and which data can be released to the public. EPA will handle data submitted in e-GGRT based on these determinations. Reporters cannot make additional claims in their XML file.

Reporters can look at this list to determine if a particular data element will be treated as CBI:

<http://www.epa.gov/climatechange/emissions/downloads11/documents/CBI-final-data-category.pdf> (PDF) (90 pp, 1.8MB, [About PDF](#))

More information on the final CBI rule is available here: <http://www.epa.gov/climatechange/emissions/CBI.html>

Q315. EPA has said that data submitted during the testing period will not be treated as confidential. Is there a risk that data submitted during testing will be made publicly available?

Data entered during the test period will not be treated as confidential and may be made publicly available. EPA encourages testers concerned about this possibility to enter only test data.

Q316. The interim final rule published in December 2010 deferred reporting of inputs until August 31, 2011, but the 2011 reporting deadline is now September 30, 2011. How is this handled in e-GGRT?

The initial deferral of the reporting deadline for inputs to emission equations (initially through August 31, 2011) was extended to September 30, 2011 in the same action that extended the 2011 reporting deadline for all data to that date (76 FR 14812, available at <http://edocket.access.gpo.gov/2011/pdf/2011-6417.pdf> (PDF) (7 pp, 70K, [About PDF](#))). EPA has proposed a longer-term deferral of the reporting deadline for inputs to emission equations (75 FR 81350, available at <http://edocket.access.gpo.gov/2010/pdf/2010-32447.pdf> (PDF) (15 pp, 154K, [About PDF](#))); e-GGRT currently reflects this proposal (i.e., does not collect inputs to emission equations) and will be updated to reflect the final rule.

Q317. Are inputs to emission equations being collected in e-GGRT?

EPA has proposed to defer the reporting deadline for inputs to emission equations (75 FR 81350, available at <http://edocket.access.gpo.gov/2010/pdf/2010-32447.pdf>) (PDF) (15 pp, 154K, [About PDF](#)) until March 31, 2014; e-GGRT currently reflects this proposal (i.e., does not collect inputs to emission equations) and will be updated to reflect the final rule.

Q318. Should reporters include calculation inputs when they upload XML files?

EPA has proposed to defer the reporting deadline for inputs to emission equations (75 FR 81350, available at <http://edocket.access.gpo.gov/2010/pdf/2010-32447.pdf>) (PDF) (15 pp, 154K, [About PDF](#)) until March 31, 2014; both e-GGRT and the XML reporting instructions currently reflect this proposal (i.e., they do not collect inputs to emission equations) and will be updated to reflect the final rule.

Q319. Are reporters required to use the calculation spreadsheets provided by EPA or may they use their own spreadsheets?

Use of the calculation spreadsheets provided by EPA is optional. Reporters may use their own spreadsheets.

Q320. Should reporters using the calculation spreadsheets submit them to EPA?

The calculation spreadsheets are for optional reporter use only and not intended to be submitted to EPA.

e-GGRT Facility Registration

- Q185. Can additional Agents be added to e-GGRT after Jan 30, 2011?
- Q186. Some of us are consultants who will be populating e-GGRT on behalf of our clients. Can you explain which role we should be assigned in e-GGRT?
- Q187. Is the technical person who prepares the information for signature the "Agent" in your terminology?
- Q188. Some reporters may have the Designated Representative (DR) and (ADR) at the plant, but a corporate employee will coordinate all the reporting. Can one employee be set up as an Agent for all plants?
- Q189. Can Agents be removed at anytime?
- Q190. Does an e-GGRT user have access to multiple facilities from one login if he or she is helping multiple clients?
- Q191. Can an Agent appoint another Agent?
- Q192. Can a contractor register for e-GGRT on behalf of a client? Or should it only be an employee?
- Q193. Is there a limit to the number of Agents or Alternate Designated Representatives (ADR) for any one company?
- Q194. I am a technical professional who will be preparing the report for my plant manager to certify. Should we both go through the process for setting up a user profile? Can I be set up as a user even though I will not certify the submission?
- Q195. Must the Designated Representative (DR) and Alternate Designated Representative (ADR) appoint the same Agents?
- Q196. Is it possible for an Agent to prepare annual greenhouse gas (GHG) reports as well as submit reports?
- Q197. Do Agents need to be set up by the Designated Representative (DR) and Alternate Designated Representative (ADR)?
- Q198. Does the person setting up have access to our facility data in e-GGRT?
- Q199. What address information should be entered for suppliers reporting at the company level?
- Q214. Does the Designated Representative (DR) have to be a vice president? Can an environmental manager prepare reports?
- Q215. Can the Alternate Designated Representative (ADR) create a user profile before a Designated Representative (DR)?
- Q216. How does a consultant enter data for a client who is the Designated Representative (DR)? What does a consultant do on the DR and Alternate Designated Representative (ADR) screen, since the consultant is neither the DR ...
- Q217. Can a company designate more than one Alternate Designated Representative (ADR)?
- Q219. So, if I understand correctly, I can register and appoint myself as the Alternate Designated Representative (ADR) and my boss as the Designated Representative (DR), but I will not get an invitation to accept the appointment ...
- Q220. What is the process for changing a Designated Representative (DR) or Alternate Designated Representative (ADR)?
- Q221. Like the Electronic Signature Agreement, does the Certificate of Representation need to be printed out, signed and mailed to EPA?
- Q222. Does a Designated Representative (DR) need to grant or appoint a consultant access to their facility?
- Q223. Can an ADR be appointed after Jan 30, 2011?
- Q224. For the Environmental Mgr to become the Designated Representative (DR) does he or she need a formal letter from the facility owners? Does that letter need be submitted with the signature page?
- Q225. Can an e-GGRT user enter in (but not sign, submit) all facility greenhouse gas (GHG) emissions without being a Designated Representative (DR), Alternate Designated Representative (ADR) or Agent?
- Q226. The Designated Representative (DR) may appoint one Alternate Designated Representative (ADR) at each facility or supplier. If my operation is both a facility and a supplier can the DR be two different people...
- Q227. What is the difference between a Designated Representative (DR) and Alternate Designated Representative (ADR), and an Agent?
- Q228. What events require the Designated Representative (DR) or Alternate Designated Representative (ADR) to resubmit a Certificate

- of Representation for the facilities they represent?
- Q251. What if I can't find my facility or supplier on the e-GGRT facility search page? Will e-GGRT provide the ability to add a new facility?
- Q252. Does the facility registration process need to be completed in one session like the user registration process?
- Q253. Will suppliers of fossil fuels (such as natural gas local distribution companies) follow the same procedure to set up a companywide Certificate of Registration?
- Q254. Our operation includes a supplier under one subpart and a facility under another. Do they have to have the same Designated Representative (DR)?
- Q267. If there is a change in owner or operator, does e-GGRT need to be updated within 90 days?
- Q270. Where can I find the Certificate of Representation to file?
- Q271. If a Designated Representative's (DR) or Alternate Designated Representative's (ADR) password expires, will their Agents still be able to access and work in e-GGRT?
- Q272. Must a large company with multiple facilities in different states have one Designated Representative (DR) for all facilities, or can each facility have its own DR?
- Q273. Is there any way to be the Agent for all facilities at a company and fill out only one Notice of Delegation?
- Q274. If you want someone to be able to prepare an electronic report but not submit, what role should they have?
- Q275. If the Designated Representative (DR) or Alternate Designated Representative (ADR) changes at a facility but no Agents change, must the DR or ADR submit new a Notice of Delegation for each Agent?
- Q283. What address information should be entered for facilities with no street or mailing address?
- Q285. I am required to report as both a facility and a supplier under Part 98? How will e-GGRT handle registration and reporting for my facility?

Q185. Can additional Agents be added to e-GGRT after Jan 30, 2011?

Yes. If the Agents are new e-GGRT users make sure to allow adequate time for the registration process. EPA must approve all new users' paper Electronic Signature Agreements before granting them access.

Q186. Some of us are consultants who will be populating e-GGRT on behalf of our clients. Can you explain which role we should be assigned in e-GGRT?

A consultant could be a Designated Representative (DR), Alternate Designated Representative (ADR), or Agent, but Agent would be a typical role. It's up to the facility or supplier owner and operator to decide.

Q187. Is the technical person who prepares the information for signature the "Agent" in your terminology?

A Designated Representative (DR), Alternate Designated Representative (ADR), or Agent can prepare a report for signature by another person. A DR or ADR can certify, sign and submit a report. An agent may submit a report on behalf of the DR or ADR. Before an Agent can submit an electronic submission, the Administrator must receive an electronic notice of delegation from the DR or the ADR specific for that Agent. The electronic notice of delegation must include the certification statement in 40 CFR 98.4(m)(v)(A), and as is indicated by the certification statement, an electronic submission by the Agent will be considered to be certified, signed, and submitted by the delegating DR or ADR.

Q188. Some reporters may have the Designated Representative (DR) and (ADR) at the plant, but a corporate employee will coordinate all the reporting. Can one employee be set up as an Agent for all plants?

Yes, if the individual is identified as an Agent by the DR and/or ADR at each of those plants.

Q189. Can Agents be removed at anytime?

Yes

Q190. Does an e-GGRT user have access to multiple facilities from one login if he or she is helping multiple clients?

Yes

Q191. Can an Agent appoint another Agent?

No. Only a Designated Representative (DR) or Alternate Designated Representative (ADR) can appoint an Agent.

Q192. Can a contractor register for e-GGRT on behalf of a client? Or should it only be an employee?

The part 98 preamble notes that "The final rule provides flexibility for the owners and operators to choose any individual, employee or non-employee, to represent them."

Q193. Is there a limit to the number of Agents or Alternate Designated Representatives (ADR) for any one company?

Each facility and supplier must have one Designated Representative (DR). Each DR may have one ADR. A DR and ADR may each have an unlimited number of Agents. For a company that has more than one facility, these limits apply to each facility.

Q194. I am a technical professional who will be preparing the report for my plant manager to certify. Should we both go through the process for setting up a user profile? Can I be set up as a user even though I will not certify the submission?

At a minimum, your plant must have a Designated Representative (DR). If you are not the DR, but instead you will prepare and enter greenhouse gas (GHG) data into e-GGRT, then the DR can appoint you as an Alternate Designated Representative (ADR) or an Agent. Any individual acting as DR, ADR, Agent or registrar can be an e-GGRT user.

Q195. Must the Designated Representative (DR) and Alternate Designated Representative (ADR) appoint the same Agents?

There is no requirement that the DR and ADR appoint the same Agents (or any).

Q196. Is it possible for an Agent to prepare annual greenhouse gas (GHG) reports as well as submit reports?

Yes. All Agents can perform electronic submissions of annual GHG reports. Before an Agent can submit an electronic submission, the Administrator must receive an electronic notice of delegation from the Designated Representative or the Alternate Designated Representative specific for that Agent. The electronic notice of delegation must include the certification statement in 40 CFR 98.4(m)(v)(A), and as is indicated by the certification statement, an electronic submission by the Agent will be considered to be certified, signed, and submitted by the delegating DR or ADR.

Q197. Do Agents need to be set up by the Designated Representative (DR) and Alternate Designated Representative (ADR)?

Any e-GGRT user can claim a facility and nominate a DR, ADR, and Agent(s) for that facility. Only a DR or ADR, however, can sign the Notice of Delegation required for an Agent to be able to submit the annual greenhouse gas (GHG) report on behalf of the DR or ADR.

Q198. Does the person setting up have access to our facility data in e-GGRT?

No. A registrar who registers a facility will not have access to any facility data. A user must be a Designated Representative (DR), Alternate Designated Representative (ADR), or Agent in order to access facility data in e-GGRT.

Q199. What address information should be entered for suppliers reporting at the company level?

Your supplier profile should contain the physical street address of company headquarters.

Q214. Does the Designated Representative (DR) have to be a vice president?

Can an environmental manager prepare reports?

The Part 98 preamble notes that "The final rule provides flexibility for the owners and operators to choose any individual, employee or non-employee, to represent them."

Q215. Can the Alternate Designated Representative (ADR) create a user profile before a Designated Representative (DR)?

Yes. The DR and ADR can register as e-GGRT users in any order. To complete facility registration, however, the DR must sign the Certificate of Representation first, then the optional ADR.

Q216. How does a consultant enter data for a client who is the Designated Representative (DR)? What does a consultant do on the DR and Alternate Designated Representative (ADR) screen, since the consultant is neither the DR ...

Q216. How does a consultant enter data for a client who is the Designated Representative (DR)? What does a consultant do on the DR and Alternate Designated Representative (ADR) screen, since the consultant is neither the DR nor authorized to appoint the DR.

It is up to the DR or ADR to determine what role is best suited for a consultant. A DR may appoint a consultant (or anyone) as an Agent. An Agent is allowed to view and update data for the facility or supplier and to submit greenhouse gas (GHG) annual reports.

Q217. Can a company designate more than one Alternate Designated Representative (ADR)?

Each facility or supplier is limited to one required Designated Representative (DR), and one optional ADR. However, each facility or supplier may assign multiple optional agents.

Q219. So, if I understand correctly, I can register and appoint myself as the Alternate Designated Representative (ADR) and my boss as the Designated Representative (DR), but I will not get an invitation to accept the appointment ...

Q219. So, if I understand correctly, I can register and appoint myself as the Alternate Designated Representative (ADR) and my boss as the Designated Representative (DR), but I will not get an invitation to accept the appointment until he registers and accepts?

Yes.

Q220. What is the process for changing a Designated Representative (DR) or Alternate Designated Representative (ADR)?

To change an ADR the DR must submit a new Certificate of Representation identifying the individual who will be the new ADR.

The preferred method to change a DR is to promote the existing ADR. The ADR in this scenario should submit a new Certificate of Representation naming him or her self as DR, and optionally, another person as ADR.

In either case, the new Certificate of Representation will only be complete when both the DR and ADR have certified, signed and submitted it to EPA using e-GGRT. As soon as the new Certificate of Representation is complete the change takes effect immediately. Only the current DR, ADR and their Agents, if any, will have access in e-GGRT to facility data.

Q221. Like the Electronic Signature Agreement, does the Certificate of Representation need to be printed out, signed and mailed to EPA?

No. The process to sign, certify and submit the Certificate of Representation is only electronic.

Q222. Does a Designated Representative (DR) need to grant or appoint a consultant access to their facility?

To access facility data in e-GGRT you must be a registered user acting as e DR, Alternate Designated Representative (ADR), or Agent. Every facility or supplier must have one DR, may have an optional ADR, and may have many optional Agents. Before an Agent can submit emissions reports for a facility, the DR or ADR who appointed the Agent must sign the Notice of Delegation for the Agent.

Q223. Can an ADR be appointed after Jan 30, 2011?

Yes, but make the ADR appointment well in advance of the reporting deadline. A new ADR must complete e-GGRT user registration and submit a paper Electronic Signature Agreement to EPA, before accepting the appointment.

The new Certificate of Representation will only be complete when both the Designated Representative (DR) and ADR have certified, signed and submitted it to EPA using e-GGRT.

Q224. For the Environmental Mgr to become the Designated Representative (DR) does he or she need a formal letter from the facility owners? Does that letter need be submitted with the signature page?

As noted in the certification statement in 40 CFR 98.4, the DR must have a binding legal agreement with the owners and operators of the facility or supplier. Unless otherwise required by the Administrator, the DR will not submit the documents of agreement to the EPA.

Q225. Can an e-GGRT user enter in (but not sign, submit) all facility greenhouse gas (GHG) emissions without being a Designated Representative (DR), Alternate Designated Representative (ADR) or Agent?

No. Only a DR, ADR or Agent can view or update facility data in e-GGRT.

Q226. The Designated Representative (DR) may appoint one Alternate Designated Representative (ADR) at each facility or supplier. If my operation is both a facility and a supplier can the DR be two different people...

Q226. The Designated Representative (DR) may appoint one Alternate Designated Representative (ADR) at each facility or supplier. If my operation is both a facility and a supplier can the DR be two different people, one for the facility and one for the supplier?

Yes. Different individuals may serve as DRs for the facility and supplier.

Q227. What is the difference between a Designated Representative (DR) and Alternate Designated Representative (ADR), and an Agent?

A DR, ADR, or Agent can prepare a report for signature by another person. A DR or ADR can certify, sign and submit a report. An agent may

submit a report on behalf of the DR or ADR. Before an Agent can submit an electronic submission, the Administrator must receive an electronic notice of delegation from the DR or the ADR specific for that Agent. The electronic notice of delegation must include the certification statement in 40 CFR 98.4(m)(v)(A), and as is indicated by the certification statement, an electronic submission by the Agent will be considered to be certified, signed, and submitted by the delegating DR or ADR.

Q228. What events require the Designated Representative (DR) or Alternate Designated Representative (ADR) to resubmit a Certificate of Representation for the facilities they represent?

The following events require the DR (and ADR if any) to sign, certify and resubmit a Certificate of Representation for a facility:

- Updates to the name, address, email, fax or telephone for the DR (or ADR if any). This includes replacing an existing DR or ADR or adding an ADR.
- Updates to the facility or supplier profile (facility name, street address, owner/operator information)

Q251. What if I can't find my facility or supplier on the e-GGRT facility search page? Will e-GGRT provide the ability to add a new facility?

Yes. On the e-GGRT facility search page click the 'ADD a New Facility' link. It will become visible at the bottom of the search results after you search at least one ZIP code.

Q252. Does the facility registration process need to be completed in one session like the user registration process?

No. You need to enter facility name, street address, city, state, ZIP code and at least one owner or operator and the DR. You can add an Alternate Designated Representative (ADR) or Agents later.

Q253. Will suppliers of fossil fuels (such as natural gas local distribution companies) follow the same procedure to set up a companywide Certificate of Registration?

Yes, the process to register a Designated Representative (DR) is the same for a facility or a supply operation.

Q254. Our operation includes a supplier under one subpart and a facility under another. Do they have to have the same Designated Representative (DR)?

No. Rule language permits you to name a separate DR for a supplier even if the operation happens to be co-located with, for example, a Part 75 (CAMD) facility. According to Part 98.4(a) each "facility, and each supplier, that is subject to this part, shall have one and only one designated representative, who shall be responsible for certifying, signing, and submitting GHG emissions reports and any other submissions for such facility and supplier respectively to the Administrator under this part." The rule distinguishes between facility subparts (C through JJ) and supplier subparts (KK to PP). The purpose here is to allow the reporter the option to name a different DR for a facility subpart and a supplier subpart even if they are at the same company or location.

Q267. If there is a change in owner or operator, does e-GGRT need to be updated within 90 days?

Yes. After any change in the owners and operators of the facility or supplier (including the addition of a new owner or operator), the Designated Representative (DR) or any Alternate Designated Representative (ADR) shall use e-GGRT to submit an updated Certificate of Representation within 90 days.

Q270. Where can I find the Certificate of Representation to file?

The Certificate of Representation is generated electronically by e-GGRT as part of the facility registration process.

Q271. If a Designated Representative's (DR) or Alternate Designated

Representative's (ADR) password expires, will their Agents still be able to access and work in e-GGRT?

Yes.

Q272. Must a large company with multiple facilities in different states have one Designated Representative (DR) for all facilities, or can each facility have its own DR?

A company may name one DR for all facilities or name a different DR at each facility. If a facility is subject to both part 98 and part 75 (Acid Rain Program or CAIR), the DR (and Alternate Designated Representative (ADR) if any) must be the same individual.

Q273. Is there any way to be the Agent for all facilities at a company and fill out only one Notice of Delegation?

No, the Designated Representative (DR) (or Alternate Designated Representative (ADR)) must certify, sign and submit a Notice of Delegation for each facility even if the Agent is the same individual at all facilities.

Q274. If you want someone to be able to prepare an electronic report but not submit, what role should they have?

There is no 'preparer' role in e-GGRT. The roles of Designated Representative (DR), Alternate Designated Representative (ADR), and Agent have equal ability in e-GGRT to view, prepare, modify, and submit a report. A registrar can set up a facility, but after sending invitations, cannot view any data.

Q275. If the Designated Representative (DR) or Alternate Designated Representative (ADR) changes at a facility but no Agents change, must the DR or ADR submit new a Notice of Delegation for each Agent?

Yes, the individual DR or ADR delegates his or her own authority to an Agent. When the DR or ADR changes, their replacements must submit a new Notice of Delegation to identify their own Agents.

Q283. What address information should be entered for facilities with no street or mailing address?

If your facility does not have a street address, provide a comma delimited WGS84 'latitude, longitude' coordinate pair with decimal degrees to four places or better. A recreational-grade GPS system gives that level of accuracy. Alternately, you may use an online satellite view, such as Google maps, by zooming in, right-clicking on your facility and selecting 'What's Here?'. The search text box will display the 'latitude, longitude' coordinates for the selected location up to six decimal places.

If your facility is offshore, provide latitude-longitude for street address as noted above and enter the following values for City, State and Zip.
City: "Offshore"
State: nearest US state
Zip: "00000"

Q285. I am required to report as both a facility and a supplier under Part 98? How will e-GGRT handle registration and reporting for my facility?

If both the direct emitter (source categories in Tables A-3 or A-4) and supplier (source categories in Table A-5) operations have the same designated representative and are in the same physical location, you may be able, but are not required, to register once in e-GGRT for both the direct emitter and supply operations. Further, you may be able, but are not required, to submit one annual GHG report containing information for both your direct emitter and supplier operations. Because they report at the corporate level rather than at the facility level, importers and exporters must register and report separately.

In order to complete one registration for both direct emitter and supplier source categories, a single designated representative for both sets of operations must complete the Certificate of Representation submission process in e-GGRT. Additional information on using e-GGRT to complete

facility registration can be found here: <http://www.ccdsupport.com/confluence/display/help/About+Facility+Registration>

One Certificate of Representation would be submitted that applies to both the direct-emitter and supply operations (see 98.3(c)(9)). Further, in order to submit one Certificate of Representation, and subsequently one annual GHG report (covering both direct-emitter and supply operations), the general information reported in 98.3(c) must be the same for both your direct emitter and supply operations. If these criteria are met, you may register your entity once in e-GGRT and submit one annual GHG report including both your direct emitter and supply operations.

If the direct emitter and supplier have different designated representatives, or if you will report different information under 98.3 (c) for the direct emitter and supply operations, then you must register and report for your direct emitter and supply operations separately.

Please note that reporters subject to Subpart LL (Suppliers of Coal-based Liquid Fuels) and/or Subpart MM (Supplier of Petroleum Products) must use the OTAQREG system to register and report for those operations. E-GGRT will not support Subpart LL or MM reporting. If your facility or supplier is required to report under any other subpart in addition to LL or MM, (for example, stationary combustion), then you will have to register in e-GGRT and submit a separate Certificate of Representation and annual GHG report for those other subparts under e-GGRT.

e-GGRT Sandbox Testing

- Q293. Can I submit my annual GHG report during the Sandbox testing?
- Q294. Will data entered during Sandbox testing be saved by EPA?
- Q295. Will data I enter during Sandbox testing be subject to public information disclosure requests?
- Q296. Should I enter my actual emissions information during Sandbox testing?
- Q297. If I note a problem with e-GGRT during Sandbox testing what should I do?
- Q298. I notice that there are no webinars scheduled for several subparts for which I will be reporting. Does this mean that I'll be unable to test these subparts during Sandbox testing?
- Q300. Is the e-GGRT Sandbox testing different than the beta testing of e-GGRT?
- Q301. Does the Sandbox testing period just give the user an early look at how e-GGRT will work?
- Q302. Are there specific tasks that the Sandbox users must complete during their testing period?
- Q367. When will the Data Reporting tab be available to start entering data?
- Q368. Is there a way to develop the data input needed for reporting during the Sandbox testing, save it, and then use it when performing the actual emission reporting?
- Q369. Do you have to be associated with a registered facility to perform the Sandbox testing or can you enter data into a fictional facility?
- Q370. Is there a deadline for signing up for Sandbox testing?
- Q371. During Sandbox testing, do we create our own facility or do we use the facility provided by EPA?
- Q372. Will everyone be able to be in the Sandbox facility at the same time? And will we see each other's entries?
- Q373. Does my existing user name and password get me into the Sandbox?
- Q374. How do we train our "leadership" to sign and submit if this capability is disabled in the Sandbox? Will there be printed or PDF instructions with screen shots and flow diagrams for these steps?
- Q375. In the Sandbox, will I be able to test both the XML upload capability and the web forms on my one test facility?
- Q376. Since the Sandbox only allows for one facility is there a simple way to clear all entered data and start over to test different types of facilities?
- Q377. During the Sandbox testing, will we be able to create any number of units or groups with different subparts?
- Q378. In the Sandbox, can we submit more than once for a facility?
- Q379. Can we test web forms using our facility, and at a later date repeat the test using a different data set? Or, do we have only one chance to test with data?
- Q380. This Sandbox testing doesn't cover Subpart LL and MM, correct? I haven't gone through the website in detail yet - are there any webinars or Sandbox testing opportunities for entering data for Subparts LL or MM?
- Q381. When the report bug or problem link is clicked, will it keep the page we're on open?
- Q382. Will there only be any additional testing opportunities after the June Sandbox testing period and before the first reporting deadline on September 30, 2011?
- Q383. Is there a chance that any of the calculation spreadsheets will be revised between the Sandbox testing and when e- GGRT is available for actual reporting?
- Q384. Will all subparts be available during the Sandbox testing?
- Q385. Might the XML schema change as a result of Sandbox testing?
- Q386. My XML report generation tool will not be ready until late in the year. Can I access the Sandbox at that time?

Q293. Can I submit my annual GHG report during the Sandbox testing?

No, the submit function is disabled in the Sandbox.

Q294. Will data entered during Sandbox testing be saved by EPA?

Data entered into the Sandbox system will not be maintained by EPA and will not be accessible to users once the testing period closes.

Q295. Will data I enter during Sandbox testing be subject to public information disclosure requests?

Yes, data entered during Sandbox testing is subject to public release. Any information released will be clearly labeled as test data. Additionally, all

submitted information may be monitored, recorded, read, copied, and disclosed by and to authorized personnel.

Q296. Should I enter my actual emissions information during Sandbox testing?

We recommend that you enter test data only.

Q297. If I note a problem with e-GGRT during Sandbox testing what should I do?

Please report problems to the e-GGRT Help Desk here:

<http://www.ccdsupport.com/confluence/display/help/e-GGRT+Help+Desk+Contact+Information+for+Sandbox+Testing>

EPA will track the ticket and inform you of the resolution.

Q298. I notice that there are no webinars scheduled for several subparts for which I will be reporting. Does this mean that I'll be unable to test these subparts during Sandbox testing?

EPA is offering webinars on those subparts for which we anticipate that a large number of stakeholders will report their emissions. Stakeholders will be able to test all subparts subject to 2010 emissions reporting during Sandbox testing.

Q300. Is the e-GGRT Sandbox testing different than the beta testing of e-GGRT?

They are one and the same.

Q301. Does the Sandbox testing period just give the user an early look at how e-GGRT will work?

All GHG reporting features of e-GGRT will be testable in the e-GGRT Sandbox. Users will be able to prepare a mock annual GHG report and e-GGRT will allow them to download and review a copy of the mock-report in HTML (web page) or XML format. Submitting the report to EPA is not enabled but is the same functionality as submitting a Certificate of Representation. In addition, the Facility Management tab will be hidden in the Sandbox.

Q302. Are there specific tasks that the Sandbox users must complete during their testing period?

No, Sandbox users are welcome to perform any range of activities from simply clicking through screens to entering data in every subpart. Some users will be trying out the XML bulk upload feature.

Q367. When will the Data Reporting tab be available to start entering data?

EPA intends to have the Data Reporting tab available well in advance of the September 30th reporting deadline. For a preview of the Data Reporting tab, go to <http://sandbox.ccdsupport.com> and register for a Sandbox test account.

Q368. Is there a way to develop the data input needed for reporting during the Sandbox testing, save it, and then use it when performing the actual emission reporting?

No, the e-GGRT Sandbox and e-GGRT production environments are separate and distinct. Further, the report generated during e-GGRT Sandbox testing may differ from that produced in the e-GGRT production environment, therefore you must wait for the release of e-GGRT for official reporting.

Q369. Do you have to be associated with a registered facility to perform the

Sandbox testing or can you enter data into a fictional facility?

You do not need to be associated with a registered e-GGRT facility to participate in the e-GGRT Sandbox testing opportunity.

Q370. Is there a deadline for signing up for Sandbox testing?

There is no deadline for signing up for the e-GGRT Sandbox however accounts are limited and will be given out on a first-come, first-served basis.

Q371. During Sandbox testing, do we create our own facility or do we use the facility provided by EPA?

You will use the facility provided by EPA. You will be unable to create additional facilities in the Sandbox.

Q372. Will everyone be able to be in the Sandbox facility at the same time? And will we see each other's entries?

Each individual registered for Sandbox testing will be assigned a separate test facility. Testers will not be able to see each other's entries.

Q373. Does my existing user name and password get me into the Sandbox?

No, the e-GGRT Sandbox and e-GGRT production environments are separate and distinct. You need to register separately for the sandbox at <http://sandbox.ccdsupport.com>

Q374. How do we train our "leadership" to sign and submit if this capability is disabled in the Sandbox? Will there be printed or PDF instructions with screen shots and flow diagrams for these steps?

EPA will post detailed reporting instructions for e-GGRT at <http://www.ccdsupport.com>. The reporting instructions will be offered in a "printer-friendly" format.

Q375. In the Sandbox, will I be able to test both the XML upload capability and the web forms on my one test facility?

Yes.

Q376. Since the Sandbox only allows for one facility is there a simple way to clear all entered data and start over to test different types of facilities?

The easiest way to erase all data for your mock facility in the e-GGRT Sandbox would be to either a) switch from web-form data entry to XML data upload then switch back, or b) de-select all of the subparts in your facility, then add them back.

Q377. During the Sandbox testing, will we be able to create any number of units or groups with different subparts?

Yes.

Q378. In the Sandbox, can we submit more than once for a facility?

While submissions cannot be made from the e-GGRT Sandbox, you may test the report generation feature multiple times.

Q379. Can we test web forms using our facility, and at a later date repeat the

test using a different data set? Or, do we have only one chance to test with data?

You may test as often as you want during the period you have access to the e-GGRT Sandbox and may test with different data by erasing the data that you have already entered and inputting new data. The easiest way to erase all data for your mock facility in the e-GGRT Sandbox would be to either a) switch from web-form data entry to XML data upload then switch back, or b) de-select all of the subparts in your facility, then add them back.

Q380. This Sandbox testing doesn't cover Subpart LL and MM, correct? I haven't gone through the website in detail yet - are there any webinars or Sandbox testing opportunities for entering data for Subparts LL or MM?

e-GGRT will not handle Subparts LL and MM reporting, these will be handled by EPA's OTAQ Fuel System.

Q381. When the report bug or problem link is clicked, will it keep the page we're on open?

Yes.

Q382. Will there only be any additional testing opportunities after the June Sandbox testing period and before the first reporting deadline on September 30, 2011?

EPA does not have any plans for additional testing opportunities at this time.

Q383. Is there a chance that any of the calculation spreadsheets will be revised between the Sandbox testing and when e- GGRT is available for actual reporting?

Yes, anything that is tested in the Sandbox is subject to be changed or revised prior to the live GHG reporting period, including the calculation spreadsheets, the web forms, the reporting forms and the XML schema.

Q384. Will all subparts be available during the Sandbox testing?

Yes, all RY2010 subparts will be available during the e-GGRT Sandbox testing period.

Q385. Might the XML schema change as a result of Sandbox testing?

Yes. Anything that is tested in the Sandbox is subject to be changed or revised prior to the live GHG reporting period including the calculation spreadsheets, the web forms, the reporting forms and the XML schema.

Q386. My XML report generation tool will not be ready until late in the year. Can I access the Sandbox at that time?

No. The Sandbox will close on July 1, 2011.

e-GGRT User Registration

- Q204. I am a CAMD Business System (CBS) user. What information will be imported to e-GGRT during user registration?
- Q205. Are the Certificates of Representation still required to be submitted by Jan 30, 2011 (for reporting year 2010), if EPA has the current Designated Representative (DR) registered in CAMD Business System (Part 75 CAIR)?
- Q206. If someone has both a CAMD Business System user account and a CDX account which one do they use to log in to e-GGRT?
- Q208. I am the Designated Representative (DR) in CAMD Business System (CBS). Do I need to be the first user to log in to e-GGRT for

- my facility or can someone else log in first?
- Q209. Is it mandatory to link the CAMD Business System Designated Representative (DR) user account with the e-GGRT DR user account?
- Q210. Why can't I find my CAMD Business System (CBS) facility in the facility search page?
- Q240. The address shown for the Electronic Signature Agreement submission looks like a street address. Can we send the Electronic Signature Agreement by via regular mail, certified mail or other express mail?
- Q241. Similar to Toxics Release Inventory (TRI), does only the certifier need to complete the Electronic Signature Agreement or do all users and Agents?
- Q242. Will it be possible to get a copy of the e-GGRT Terms and Conditions so I can review them in advance?
- Q243. If a single individual will be entering information for multiple facilities, can a single Electronic Signature Agreement be submitted to cover all facilities or will multiple Electronic Signature Agreements need to be submitted?
- Q245. If I've already submitted an Electronic Signature Agreement for my CDX account, do I have to submit another one for e-GGRT?
- Q246. If I've submitted an Electronic Signature Agreement for my CAMD Business System account, will that work for e-GGRT?
- Q247. To what address do I send the Electronic Signature Agreement?
- Q248. My Electronic Signature Agreement is lost. How do I print a new copy and mail it in?
- Q249. Why would EPA reject an Electronic Signature Agreement?
- Q256. Do Agents have a different login and password from the Designated Representative (DR)?
- Q257. What happens if you do not complete user registration in one session? Can you start again later?
- Q258. Does e-GGRT allow an international address in the user profile?
- Q259. Is there a mechanism to support multiple companies from a single email address?
- Q260. How often do I need to change my e-GGRT password?
- Q261. I forgot my e-GGRT user name. How do I retrieve it?
- Q262. I lost my password. How can I get it reset?
- Q263. How do I reset my expired password?
- Q264. How do I unlock my e-GGRT account?
- Q265. During user registration, I already provided a secret question and answer. Why do I also need challenge questions and answers?
- Q269. If I submit data only once a year, why does the password expire every 90 days?
- Q277. Can you log in to e-GGRT with your ECMPs user name and password?

Q204. I am a CAMD Business System (CBS) user. What information will be imported to e-GGRT during user registration?

If you are the Designated Representative (DR) or Alternate Designated Representative (ADR) for a facility that is subject to 40 CFR 75 you can import user profile and facility information from CBS to e-GGRT. After linking the accounts, e-GGRT will display your list of CAMD facilities on the e-GGRT home page. If you can log in to CBS and you have an Electronic Signature Agreement on file with EPA, e-GGRT can reuse it. If you cannot log in to CBS, the e-GGRT Help Desk can link the accounts for you.

Q205. Are the Certificates of Representation still required to be submitted by Jan 30, 2011 (for reporting year 2010), if EPA has the current Designated Representative (DR) registered in CAMD Business System (Part 75 CAIR)?

Yes. Part 98 requires the Part 75 DR to certify, sign and submit a Certificate of Representation for each facility or supplier. If a facility is subject to both part 98 and part 75 (Acid Rain Program or CAIR), the DR must be the same individual.

Q206. If someone has both a CAMD Business System user account and a CDX account which one do they use to log in to e-GGRT?

Users log in to e-GGRT using their e-GGRT user ID and password.

Q208. I am the Designated Representative (DR) in CAMD Business System (CBS). Do I need to be the first user to log in to e-GGRT for my facility or can someone else log in first?

CBS users can register as e-GGRT users in any order. However, only the DR and Alternate Designated Representative (ADR) can link their CBS and e-GGRT accounts. Importing facilities by linking CBS and e-GGRT accounts is the strongly preferred method for registering CBS facilities in e-GGRT. If the facility is not imported from CBS, completion of the registration process for the facility may be significantly delayed.

Q209. Is it mandatory to link the CAMD Business System Designated Representative (DR) user account with the e-GGRT DR user account?

Yes. Part 98 requires that the DR must be the same person as the DR under Part 75.

Q210. Why can't I find my CAMD Business System (CBS) facility in the facility search page?

It is strongly recommended that CBS users import their CBS facilities by linking their CBS and e-GGRT accounts during user registration. If the facility is not imported from CBS, completion of the registration process for the facility may be significantly delayed.

Q240. The address shown for the Electronic Signature Agreement submission looks like a street address. Can we send the Electronic Signature Agreement by via regular mail, certified mail or other express mail?

You can send the Electronic Signature Agreement using first class mail, certified mail or express mail.

Q241. Similar to Toxics Release Inventory (TRI), does only the certifier need to complete the Electronic Signature Agreement or do all users and Agents?

Every DR, ADR, and Agent must have an approved Electronic Signature Agreement on file with EPA to use e-GGRT.

Q242. Will it be possible to get a copy of the e-GGRT Terms and Conditions so I can review them in advance?

The Terms and Conditions for e-GGRT are available online at: <http://www.ccdsupport.com/confluence/display/help/Terms+and+Conditions>

Q243. If a single individual will be entering information for multiple facilities, can a single Electronic Signature Agreement be submitted to cover all facilities or will multiple Electronic Signature Agreements need to be submitted?

The Electronic Signature Agreement is associated with the individual, not a facility. An individual is required to submit only one Electronic Signature Agreement.

Q245. If I've already submitted an Electronic Signature Agreement for my CDX account, do I have to submit another one for e-GGRT?

Yes.

Q246. If I've submitted an Electronic Signature Agreement for my CAMD Business System account, will that work for e-GGRT?

Yes, if you successfully link your CAMD account during registration then e-GGRT will determine if your Electronic Signature Agreement is on record at EPA.

Q247. To what address do I send the Electronic Signature Agreement?

Send your signed and dated Electronic Signature Agreement to:

E-GGRT Help Desk
SAIC
8301 Greensboro Drive, Mail Stop E-11-2
McLean, VA 22102
703-676-4400

Q248. My Electronic Signature Agreement is lost. How do I print a new copy and mail it in?

Log in to e-GGRT. Click on the link that says "Electronic Signature Agreement". Print out a new copy, then sign it and date it and mail it to the address shown.

Q249. Why would EPA reject an Electronic Signature Agreement?

EPA will reject an Electronic Signature Agreement if it is not signed or dated, or if the signature does not match the name printed on the form.

Q256. Do Agents have a different login and password from the Designated Representative (DR)?

Yes. Every e-GGRT user must have his or her own account.

Q257. What happens if you do not complete user registration in one session? Can you start again later?

For user registration, all steps through creating the Electronic Signature Agreement must be completed in one session. If you start again later, all previous data will be lost.

Q258. Does e-GGRT allow an international address in the user profile?

Yes. E-GGRT allows each user to indicate a country in the user profile.

Q259. Is there a mechanism to support multiple companies from a single email address?

One user in e-GGRT may be associated with multiple facilities, in the same or different roles (Designated Representative (DR), Alternate Designated Representative (ADR), or Agent). Each user in e-GGRT must have a unique email address.

Q260. How often do I need to change my e-GGRT password?

You must change your e-GGRT password at least every 90 days. If you do not change it within 90 days, your account will be locked.

Q261. I forgot my e-GGRT user name. How do I retrieve it?

If you have forgotten your e-GGRT user name, you can retrieve it as follows:

1. Click on the "Forgot your User Name" link on the e-GGRT login page.
2. Enter the email address you entered in your user profile and click the SUBMIT button.
3. Enter the answer to your secret question and click the SUBMIT button.
4. An email will be sent to the email address associated with your e-GGRT account. This email will provide you with your e-GGRT user name. If you do not receive the email within a few minutes, you may want to check your spam or junk mail folder.

Q262. I lost my password. How can I get it reset?

If you have forgotten your e-GGRT password, or think you may be using an incorrect password, you can reset it as follows:

1. Click on the "Forgot your Password" link on the e-GGRT login page.
2. Enter your e-GGRT user name and click the SUBMIT button.
3. Enter the answer to your secret security question and click the SUBMIT button.
4. An email with a single-use password will be sent to the email address associated with your e-GGRT account. If you do not receive the email within a few minutes, you may want to check your spam or junk mail folder. Use the one-time password to log in to e-GGRT. Once you have logged in, you will be required to change your password.

Q263. How do I reset my expired password?

If you attempt to log in to e-GGRT, and a message indicates that your e-GGRT password has expired, you will be presented with the Change My Password screen. Your new password must be 8 to 15 characters long and contain at least one number, one uppercase and one lowercase letter. Passwords cannot start or end with a number. Passwords cannot contain spaces, symbols, your user name or the word 'password'.

Q264. How do I unlock my e-GGRT account?

If you attempt to log in to e-GGRT and an error message indicates that your e-GGRT user account is locked, contact the e-GGRT Help Desk by phone at 877-444-1188 (703-676-4400 from outside the U.S.).

Q265. During user registration, I already provided a secret question and answer. Why do I also need challenge questions and answers?

The secret question and answer are used as part of security procedures such as resetting your password. Challenge questions and answers are used for electronic signatures. Different approaches were used to meet the needs of each requirement.

Q269. If I submit data only once a year, why does the password expire every 90 days?

The 90-day expiration of passwords is required to comply with EPA security guidelines. Note that e-GGRT allows you to reset your password by using the 'Forgot your User Name or Password?' link on the login page.

Q277. Can you log in to e-GGRT with your ECMPs user name and password?

No. You must log in using your e-GGRT user name and password.

Subpart A. General Provisions

- Q1. What is the action being taken?
- Q2. What is the purpose of the rule?
- Q3. What is the effective date of the rule?
- Q5. Who will have to report under the final rule?
- Q7. Which greenhouse gases (GHGs) are covered under the rule?
- Q9. Are mobile sources included in this rule?
- Q10. What is the definition of a "facility"?
- Q11. Will EPA collect data at the unit-, facility-, or corporate-wide level?
- Q12. Will EPA accept emissions information from facilities that do not have to report under the mandatory reporting rule? Basically can...
- Q13. Can you please describe what constitutes a facility? For example, if a hospital has four buildings, does the rulemaking pertain to the four buildings as a composite, or to each individually?
- Q14. What is the estimated cost to implement this rule?
- Q15. What impact does this rule have on small businesses?
- Q16. Did EPA engage stakeholders in the development of the rule?
- Q17. Was my comment submitted during the public comment period addressed?
- Q18. Is this rule a cap and trade regulation?
- Q20. Does the rule apply to U.S. Territories?
- Q21. How did EPA develop the general threshold of 25,000 metric tons of carbon dioxide equivalent (mtCO₂e) per year?
- Q22. How much is 25,000 metric tons of CO₂ equivalent (mtCO₂e)?
- Q23. Are there some sectors where all facilities have to report regardless of whether they meet the 25,000 metric tons of carbon dioxide equivalent (mtCO₂e) annual threshold?
- Q25. Will all direct emitters of greenhouse gases (GHGs) be included in the rule?
- Q26. Is there a simple way for facilities with stationary fuel combustion units to determine if they will be required to report?
- Q27. Will individual home owners be required to report under this rule?
- Q28. Will individual car or truck owners be required to report?
- Q29. Will owners of commercial buildings be required to report?
- Q30. Will federal, state, or local facilities have to report emissions?
- Q31. Are terrestrial carbon sequestration ("sinks") and offsets projects included in this rule?
- Q32. Why are both downstream and upstream reporting required?
- Q33. Will there be double-reporting of emissions under this rule?
- Q35. How is the reporting of ethanol production and or biogenic emissions being handled in the rule?
- Q36. The Applicability Tool says I need to report, but I don't think the tool is right. Please confirm.
- Q37. Is applicability based on actual emissions or potential emissions?
- Q42. How will emissions data be verified?

- Q43. Will EPA provide training and guidance for reporters?
- Q45. If facility intends to obtain fuel usage data from utility bills, but its utility bills reflect fuel usage through middle of the month, how does EPA recommend a facility estimate fuel use for the calendar year? Is it acceptable to pro-rate fuel use?
- Q50. When are reporters required to complete their GHG Monitoring Plan?
- Q51. What representative of a reporting facility is in charge of reporting? For example, is it the operator or facility owner? What if a contractor operates a facility owned by someone else? Lastly, can a third party...
- Q53. Does this final rule preempt states from regulating or requiring reporting of greenhouse gases (GHGs)?
- Q54. Will data collection be delegated to state agencies?
- Q56. How is this reporting rule different from the Inventory of U.S. Greenhouse Gas Emissions and Sinks report (Inventory)?
- Q57. Will this rule negate the need for the Inventory of U.S. Greenhouse Gas Emissions and Sinks in the future?
- Q58. Would this rule need to be addressed in Title V operating permits?
- Q59. How could the passing of the Waxman-Markey Bill affect this regulation?
- Q60. How will the GHG Reporting Rule fit in or be harmonized with state and local reporting obligations for criteria pollutants, toxics, and state-specific GHG reporting requirements?
- Q61. How will data be efficiently shared among existing state greenhouse gas (GHG) programs and this new federal reporting program?
- Q62. Where can I find more detailed information on the rule?
- Q110. If two entities share a Title V permit would that preclude them from reporting separately even if there is no common ownership or control?
- Q126. If a campus is divided by several blocks of property not owned by the entity – can that area be defined as a facility by itself?
- Q127. If a campus is divided by a non-owned body of water (e.g., a river), does that create two distinct facilities?
- Q129. I leased space within my definition of "facility", if I do not track fuel use for that space, do I have to include it in my report?
- Q130. I have space which I own, but lease to a third party within my "facility" and the tenant pays the utilities, do I have to include that building space?
- Q131. Some entities may choose to report all greenhouse emissions for ease of data management, even if some sources do not meet the definition of "facility" and exceed the threshold. If cap and trade rules on greenhouse gas emissions are promulgated...
- Q132. Provide one or two specific examples of what would be acceptable to EPA under §98.3(g)(5)(i)(B), "Explanation of processes and methods used to collect the necessary data for the GHG calculations".
- Q142. In the event fuel volume is based on third-party fuel billing meters that meet the exemption in 98.3 i 4, what are the record keeping requirements?
- Q155. How did EPA use input from stakeholders in the development of the proposed rule amendments?
- Q179. Section 98.4(b) states the designated representative shall be an individual selected by an agreement binding on the owner or operator of the facility. What constitutes the "agreement"?
- Q180. For subparts that were published on June 12, 2010, which are magnesium production (subpart T), underground coal mines (subpart FF), industrial wastewater treatment (subpart II) and...
- Q181. When are the requests for use of Best Available Monitoring Methods (BAMM) for subparts T, FF, II, and TT due?
- Q182. For subparts T, FF, II, and TT, is the use of Best Available Monitoring Methods (BAMM) automatically allowed for the first quarter of 2011 (January 1, 2011 to March 31, 2011)?
- Q278. My facility has completed its use of best available monitoring methods (BAMM) and is now fully following the methods in the final rule. Do and I need to notify EPA of this change?
- Q284. The definition of "owner" and "operator" under 98.6 refers to a "person." Is a person only a single individual?
- Q299. What does EPA mean by the term "sequential or simultaneous" in the definition of co-generation?
- Q321. Does the roll-up calculator distinguish between direct emitters and suppliers?
- Q388. Who must submit requests and one-time reports to EPA under Part 98?

Disclaimer This information is intended to provide general and administrative information about 40 CFR Part 98. It does not represent legal advice. This information does not 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. Facility owners or operators and suppliers are responsible for determining how they would be affected by the requirements of 40 CFR Part 98.

Q1. What is the action being taken?

EPA is issuing a regulation to require reporting of greenhouse gas (GHG) emissions from all sectors of the economy in the United States. The final rule applies to fossil fuel suppliers and industrial gas suppliers, direct greenhouse gas emitters and manufacturers of vehicles and engines outside of the light-duty sector 1. The rule does not require control of GHGs, rather it requires only that sources above certain threshold levels monitor and report emissions. EPA's analysis shows that the rule will not affect homeowners, small businesses, schools, or commercial establishments such as drycleaners or retail stores. This rule was prepared in accordance with the FY2008 Consolidated Appropriations Act, which was signed into law in December 2007. EPA issued the rule pursuant to its authority under the Clean Air Act.

Q2. What is the purpose of the rule?

The purpose of the rule is to collect accurate and timely data on greenhouse gas (GHG) emissions that can be used to inform future policy decisions.

Q3. What is the effective date of the rule?

The effective date is 60 days after the rule is published in the federal register. The Mandatory Reporting of Greenhouse Gases Rule was published in the federal register on October 30, 2009 and thereby the effective date is December 29, 2009.

Q5. Who will have to report under the final rule?

In general, the rule calls for fossil fuel suppliers and industrial gas suppliers, manufacturers of vehicles and engines outside of the light-duty sector, and certain downstream facilities that emit greenhouse gases (primarily large facilities emitting 25,000 metric tons of carbon dioxide equivalent (mtCO₂e) or more of GHG emissions per year) to submit annual reports to EPA.

Q7. Which greenhouse gases (GHGs) are covered under the rule?

The rule will require reporting of anthropogenic GHG emissions covered under the United Nations Framework Convention on Climate Change (UNFCCC); carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorochemicals (PFC), and sulfur hexafluoride (SF₆), as well as other fluorinated gases (e.g., nitrogen trifluoride and hydrofluorinated ethers). These gases are often expressed in metric tons of carbon dioxide equivalent (mtCO₂e).

Q9. Are mobile sources included in this rule?

Yes, EPA will collect greenhouse gas (GHG) emissions rate information from the manufacturers of new vehicles and engines outside of the light-duty sector, including heavy trucks, motorcycles, and non-road engines and equipment. We incorporated these requirements into the long-standing criteria emissions testing and reporting requirements under Title II of the CAA (Clean Air Act), and built from existing testing methods. Mobile source emissions will also be accounted for through upstream reporting by suppliers of petroleum products and coal-based liquid fuels. We are not requiring facilities to report emissions from mobile sources at their operations such as fleets.

Requirements related to light-duty vehicles (including light-duty trucks and medium-duty passenger vehicles) are not included in this rulemaking. EPA has proposed a comprehensive light-duty GHG emission control program commencing in model year (MY) 2012 which includes GHG measurement and reporting. For more information visit EPA's Office of Transportation and Air Quality website: <http://www.epa.gov/otaq/climate/regulations.htm>

Q10. What is the definition of a “facility”?

The rule defines “facility” as any physical property, plant, building, structure, source, or stationary equipment located on one or more contiguous or adjacent properties in actual physical contact or separated solely by a public roadway or other public right-of-way and under common ownership or common control, that emits or may emit any greenhouse gas. Operators of military installations may classify such installations as more than a single facility based on distinct and independent functional groupings within contiguous military properties.

Q11. Will EPA collect data at the unit-, facility-, or corporate-wide level?

For the majority of reporters, EPA will collect data at the facility level. There are a few exceptions where there will be reporting at the corporate level for some supplier source categories (e.g., importers of fuels or industrial greenhouse gases or manufacturers of vehicles and engines outside of the light-duty sector). For some source categories, the final rule does require the reporter to provide information at the unit-level or process-line level, as well as for the facility as a whole.

Q12. Will EPA accept emissions information from facilities that do not have to report under the mandatory reporting rule? Basically can...

Q12. Will EPA accept emissions information from facilities that do not have to report under the mandatory reporting rule? Basically can reporters provide voluntary information to EPA following MRR protocols? In turn would EPA keep this info and share it with the states?

At this point, EPA does not have provisions for voluntary reporting of emissions from emissions sources or facilities not covered by the rule. Please see the discussion of why we don't in our Response to Comments document, Volume 1: Selection of Source Categories to Report and Level of Reporting response to <http://www.epa.gov/climatechange/emissions/responses.html>.

Q13. Can you please describe what constitutes a facility? For example, if a hospital has four buildings, does the rulemaking pertain to the four buildings as a composite, or to each individually?

Q13. Can you please describe what constitutes a facility? For example, if a hospital has four buildings, does the rulemaking pertain to the four buildings as a composite, or to each individually? What if the four separate buildings are connected by above-ground or below-ground walkways/tunnels? What if an industrial campus has several different businesses on its property? Each business calculates their own? And if one of the businesses has several buildings, are they treated as a composite or individually? Additionally, the same would apply for a University that has buildings on one campus, or as in many urban settings, the buildings are located in various addresses in a city.

The term "facility" is defined in 40 CFR 98.6 "as any physical property, plant, building, structure, source, or stationary equipment located on one or more contiguous or adjacent properties in actual physical contact or separated solely by a public roadway or other public right-of-way and under common ownership or common control, that emits or may emit any greenhouse gas." Therefore, a hospital with four buildings is considered a single facility if the four buildings are located on contiguous or adjacent properties and are under common ownership or common control. Note that the buildings do not have to be connected by walkways, tunnels, pipelines, etc to be considered a single facility. If a company has processes or units that are located on an industrial campus (such as a business park) that consists of several other business, then the company must determine applicability and report emissions only for the processes and units that are under common ownership or common control (i.e., those emissions processes and units that they own and/or operate). For example, a business park has two tenants: (1) Tenant A has three buildings and operates a hydrogen production process in one building and stationary combustion units in the other two buildings; and (2) Tenant B has one building produces titanium dioxide. Tenant A and Tenant B are separate entities that do not share common ownership or operation of any of their process units. Therefore, Tenant A is considered a separate facility to Tenant B and each must determine the applicability of the rule and if subject to the rule must report emissions separately. Tenant A must determine applicability and, if necessary, report emissions for all three buildings since they meet the definition of a single facility (i.e., they have common ownership and are located on contiguous property). A University that has multiple buildings on one campus would meet the definition of 'facility' since they are located on contiguous property and have common ownership. If the University owns other buildings located on adjacent properties, then these buildings would also be considered part of the same facility. However, buildings not located on contiguous or adjacent property would not meet the definition of 'facility' as defined in 40 CFR 98.6 and would therefore be considered separate facilities under this rule.

Q14. What is the estimated cost to implement this rule?

EPA estimates that the expected cost to comply with the reporting requirements to the private sector is \$115 million for the first year. In subsequent years, the estimated annualized cost for the private sector is \$72 million.

Q15. What impact does this rule have on small businesses?

As a part of the Regulatory Impact Analysis for this rule, EPA has calculated that this rule will not have a significant economic impact on a substantial number of small entities. While EPA estimates that some small businesses in some sectors will be required to report, the cost of reporting will be less than one percent of the average annual sales, even for the sectors with the largest economic impacts. For more information on this topic please view the rule itself and view the Small Business Information Sheet on [the Information Sheet page](#).

Q16. Did EPA engage stakeholders in the development of the rule?

Yes. EPA staff held more than 150 meetings with over 4,000 stakeholders attending, including trade associations, industries, state and regional governments, environmental groups, and tribal associations during the public comment period and finalization of the rule. In addition, two public hearings on the Proposed Mandatory Greenhouse Gas Reporting Rule were held in April 2009. EPA also received approximately 16,800 written comments during the rule's public comment period.

Q17. Was my comment submitted during the public comment period addressed?

EPA received nearly 17,000 comments regarding the proposed rule. EPA considered these comments in preparing the final rule signed on September 22, 2009. Responses to the comments received can be located in the "Response to Comments" documents at: <http://www.epa.gov/climatechange/emissions/responses.html>

Q18. Is this rule a cap and trade regulation?

The purpose of the final rule is to collect accurate and timely data on greenhouse gas (GHG) emissions that can be used to inform future policy decisions. It is not a cap and trade regulation.

Q20. Does the rule apply to U.S. Territories?

Yes, for the purposes of the rule, "United States" is defined as including the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, American Samoa, the Virgin Islands, Guam, and any other Commonwealth, territory or possession of the United States, as well as the territorial sea as defined by Presidential Proclamation No. 5928.

Q21. How did EPA develop the general threshold of 25,000 metric tons of carbon dioxide equivalent (mtCO₂e) per year?

EPA considered several factors when developing the reporting threshold, including the form of the threshold (e.g., emissions/year, potential to emit, capacity-based, facility or unit level). EPA reviewed existing capacity-based (e.g., 25 megawatts) and emissions-based thresholds used in other GHG emissions programs (e.g., California's 25,000 mtCO₂e) and the 10,000 mtCO₂e levels used in some voluntary programs, such as the Department of Energy's (DOE's) 1605b program. Based on our review, EPA has determined that the selected 25,000 metric ton CO₂e threshold will cover many of the types of facilities and suppliers typically regulated under the CAA, while appropriately balancing emission coverage and burden. EPA estimated that at a threshold of 25,000 metric tons of mtCO₂e/year, approximately 10,000 facilities and 85 percent of total GHG emissions will be covered. At the 10,000 mtCO₂e/year level, EPA found that there would be a higher economic impact on small businesses including small industrial facilities and commercial buildings.

Q22. How much is 25,000 metric tons of CO₂ equivalent (mtCO₂e)?

25,000 mtCO₂e are equivalent to emissions from the annual energy use of approximately 2,300 homes. The threshold is also roughly equivalent to the annual greenhouse gas (GHG) emissions from approximately 4,600 passenger vehicles. It is also equivalent to just over 58,000 barrels of oil consumed or 131 railcars' worth of coal. For more information about GHG emissions equivalencies in general you may access [EPA's Greenhouse Gas Equivalencies Calculator](#).

Q23. Are there some sectors where all facilities have to report regardless of whether they meet the 25,000 metric tons of carbon dioxide equivalent (mtCO₂e) annual threshold?

Yes. For some of the source categories, all of the facilities that have that particular source category within their boundaries will be subject to the rule. For these facilities, EPA's analysis indicated that all or nearly all facilities with that source category emit more than 25,000 mtCO₂e per year, and that an "all in" would simplify their applicability determination. These source categories include large manufacturing operations such as petroleum refineries and cement production. For more information on which source categories will be covered, please review the rule and view the General Provisions Information Sheet on the Information Sheet page.

Q25. Will all direct emitters of greenhouse gases (GHGs) be included in the rule?

No. Direct emissions from entities that do not contain a source category where all entities are required to report and whose emissions fall below the threshold of 25,000 metric tons of carbon dioxide equivalent (mtCO₂e) per year are not required to report. Also, certain emissions sources were not included in the rule due to difficulty in measurement and gathering data. These sectors include many of the biological sources of GHG emissions such as methane emissions from rice production and enteric fermentation from cattle and other ruminant animals. EPA's objective was to maximize coverage of U.S. emissions while minimizing administrative burden to reporters and the government. Lastly, there are a number of source categories that were included in the proposed rule that EPA is not finalizing at this time. For these source categories, EPA is further considering comments and options. This rule is estimated to cover about 85 percent of total national U.S. emissions.

Q26. Is there a simple way for facilities with stationary fuel combustion units to determine if they will be required to report?

Yes. In order to reduce burden on small emitters, EPA is not including any facility that has an aggregate maximum rated heat input capacity of the stationary fuel combustion units of less than 30 mmBtu/hr and no other emission sources within their boundary. Stationary combustion units include among others boilers, combustion turbines, engines, incinerators, and process heaters. According to our analysis, a facility with stationary combustion units that has a maximum rated heat input capacity of less than 30 mmBtu/hr will not exceed the threshold of 25,000 metric tons of

carbon dioxide equivalent (mtCO₂e) per year. In the event that the aggregate maximum rated heat input capacity of the stationary combustion units at the facility exceed 30 mmBtu/hr, then the facility will need to do further calculations to determine if it meets the threshold for reporting. EPA has developed an on-line applicability tool to help facilities assess if they are required to report. This tool is available on the [Greenhouse Gas \(GHG\) Mandatory Reporting Rule Website](#). For more information on this topic please view subpart C of the rule and view the Stationary Fuel Combustion Sources Information Sheet on [the Information Sheet page](#).

Q27. Will individual home owners be required to report under this rule?

No. The general stationary fuel combustion source category covers units that generate electricity, steam, or useful energy or heat for industrial, commercial or institutional use. Also, it is important to note that the average annual household emissions in the U.S. are about 11 metric tons of carbon dioxide equivalent (mtCO₂e), well below the threshold for reporting of 25,000 mtCO₂e per year.

Q28. Will individual car or truck owners be required to report?

No. Under the rule, emissions from mobile sources will be covered by reports from fuel suppliers and manufacturers of vehicles and engines outside of the light-duty sector. No data will be collected from fleet operators or vehicle owners in this rule.

Q29. Will owners of commercial buildings be required to report?

The vast majority of commercial building owners will likely not be required to report. For commercial operations, over 75 percent of buildings have combustion equipment less than 1 mmBtu/hr. When it comes to commercial buildings having boilers for heating water and steam, approximately 80 percent of the buildings have boilers less than 10 mmBtu/hr. These are well below the threshold for aggregate maximum rated heat input capacity of the stationary fuel combustion units of less than 30 mmBtu/hr. If a commercial building does have an aggregate maximum rated heat input capacity equal to or greater than 30 mmBtu/hr, then that facility will need to do further calculations to determine if it meets the threshold for reporting. EPA has developed an on-line applicability tool to help facilities assess if they are required to report. This tool is available on the [Greenhouse Gas \(GHG\) Mandatory Reporting Rule Website](#).

Q30. Will federal, state, or local facilities have to report emissions?

The majority of building owners or operators will very likely not be required to report, including federal, state, or local facilities. Most federal, state, or local facilities will likely only have to consider whether their emissions from stationary combustion are over 25,000 metric tons of carbon dioxide equivalent (mtCO₂e), because they will not have other onsite operations that may trigger the rule (e.g., a power plant). Over 75 percent of buildings have stationary combustion equipment with an aggregate maximum rated heat input capacity of less than 1 mmBtu/hr. When it comes to most buildings with boilers for heating water and steam, approximately 80 percent of buildings have boilers with an aggregate maximum rated heat input capacity of less than 10 mmBtu/hr. These are well below the threshold for aggregate maximum rated heat input capacity of the stationary fuel combustion units of less than 30 mmBtu/hr. If a building does have an aggregate maximum rated heat input capacity 30 mmBtu/hr or greater, then that facility will need to do further calculations to determine if it meets the threshold for reporting. EPA has developed an on-line applicability tool to help facilities assess if they are required to report. This tool is available on the [Greenhouse Gas \(GHG\) Mandatory Reporting Rule Website](#).

If a federal, state, or local facility has other source categories that are included in the rule, such as a power plant (see the General Provisions Information Sheet on [the Information Sheet page](#).) the facility may be required to report. Generally, EPA estimates that there will be limited impact on federal, state, or local facilities.

Federal, state, or local facilities will not have to report emissions from fleets (e.g., passenger vehicles, aircraft, and marine vessels) or from Research and Development (R&D) activities under the rule.

Q31. Are terrestrial carbon sequestration (“sinks”) and offsets projects included in this rule?

No. This rule focuses solely on reporting of emissions, or fuel or chemicals that cause emissions. It is not meant to be a registry tracking individual projects or reductions; nor is it intended to replace the [Inventory of U.S. Greenhouse Gas Emissions and Sinks](#).

Q32. Why are both downstream and upstream reporting required?

This rule responds to a specific request from Congress to collect data on greenhouse gas (GHG) emissions from both upstream production and downstream sources, as appropriate. The rule requires reporting by facilities that directly emit GHGs above the selected threshold as a result of combustion of fuel or industrial processes (downstream sources). The majority of these reporters are large facilities in the electricity generation and industrial sectors. The rule also requires upstream suppliers of fossil fuels and industrial GHGs to report the GHG emissions that could be emitted from combustion or use of the quantity of fuels or industrial gases supplied into the economy. In many cases, the fossil fuels and industrial GHGs supplied by producers and importers are used and ultimately emitted by a large number of small sources. To cover these direct emissions would require reporting by hundreds or thousands of small facilities. To avoid this impact, the rule does not include all of those emitters but instead requires reporting by the suppliers of industrial gases and suppliers of fossil fuels. The data collected under this rule are consistent with

the appropriations language and provide valuable information to EPA and stakeholders in the development of climate change policy and programs. Potential policies such as low carbon fuel standards can only be applied upstream, whereas end-use emission standards can only be applied downstream. Data from upstream and downstream sources would be necessary to formulate and assess the impacts of such potential policies. Eliminating reporting by either upstream sources or downstream sources would not satisfy EPA's data needs and policy objectives of this rule.

Q33. Will there be double-reporting of emissions under this rule?

Yes. There is inherent double-reporting of emissions in a program that includes both upstream and downstream sources. For the reasons discussed above, collecting greenhouse gas (GHG) emissions from both upstream production and downstream sources is consistent with the request from Congress and provides valuable information to EPA and stakeholders in the development of climate change policy and programs. That said, EPA does not intend to use emissions data collected by this rule as a replacement for the national emission estimates found in the annual Inventory of U.S. GHG Emissions and Sinks. That Inventory is a comprehensive, top-down national assessment of U.S. GHG emissions, and it uses top-down national energy data and other national statistics. Whereas this rule, collects GHG emissions data from certain sources over a specific threshold and the data collected will serve as a useful tool to better improve the accuracy of future national-level inventories.

Q35. How is the reporting of ethanol production and or biogenic emissions being handled in the rule?

Ethanol production facilities are not excluded from the rule. The sources of GHG emissions at ethanol production facilities that were to be reported under the proposed rule were stationary fuel combustion, onsite landfills, and onsite wastewater treatment. At this time, the Mandatory Reporting of Greenhouse Gases Rule does not require emissions from onsite industrial landfills and wastewater treatment to be reported (see Question 1). Stationary fuel combustion sources at ethanol production facilities are subject to the requirements of the rule if those emissions exceed the 25,000 metric tons CO₂e threshold.

Refineries that meet the definition of petroleum supplier must report any ethanol that is co-processed with petroleum in order to subtract biogenic emissions from the final calculation of emissions that would result from the complete combustion or oxidation of products supplied. CO₂ suppliers that supply biogenic CO₂ to the economy (such as ethanol plants with CO₂ capture equipment) must report that supply.

Carbon dioxide emissions from the combustion of biomass are not counted toward a facility's emissions in the threshold determination, but emissions of CH₄ and N₂O from biomass combustion are counted in the threshold determination. All biogenic emissions are to be reported separately under the rule.

Q36. The Applicability Tool says I need to report, but I don't think the tool is right. Please confirm.

The applicability tool is intended solely as compliance assistance for potential reporters to aid in assessing whether they are required to report under the Mandatory Reporting of Greenhouse Gases Rule. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern.

The applicability tool and its contents do not constitute rulemaking or a decision by EPA and may not be relied upon to create a substantive or procedural right or benefit enforceable by law, or in equity, by any person. While this tool is designed to help potential reporters comply with the rule, comply with all Federal, State, and Local laws and regulations remains the sole responsibility of each facility owner or operator subject to those laws and regulations. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

No information entered by the user is maintained by EPA, and any results generated by the applicability tool, along with additional information entered by the user, do not constitute a submission for purposes of compliance with the rule.

Q37. Is applicability based on actual emissions or potential emissions?

If you are required to estimate your emissions to determine if your facility is subject to the rule, the applicability determination is based on actual emissions.

Q42. How will emissions data be verified?

EPA will verify the data submitted. EPA will not require third party verification. Prior to EPA verification, reporters will be required to self-certify the data they submit to EPA. In selecting the approach to emissions verification, EPA reviewed all of the comments, as well as emissions verification requirements and procedures under a number of existing EPA regulatory programs and domestic and international greenhouse gas (GHG) reporting programs. We decided to retain the self certification with EPA verification approach because it provides greater assurance of accuracy and impartiality than self-certification without verification, and has a number of advantages over third party verification for this type of Federal program. We determined that the combination of comprehensive electronic review and a flexible and adaptive program of on-site auditing will enable EPA to effectively target verification resources while also providing the necessary consistency and quality in the data. Additionally, this approach is the best way to address the many comments we received on the importance of obtaining 2010 data.

Q43. Will EPA provide training and guidance for reporters?

Yes. EPA is providing a wide variety of tools that will assist potential reporters to comply with this rulemaking. EPA has developed an on-line applicability tool that will assist potential reporters to assess whether they would be required to report. In addition, EPA has developed several guidance documents that are available on our website. Finally, EPA will be hosting a number of webinars and attending meetings to provide information to reporters about the final requirements. For the latest outreach information please visit our website at: <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

Q45. If facility intends to obtain fuel usage data from utility bills, but its utility bills reflect fuel usage through middle of the month, how does EPA recommend a facility estimate fuel use for the calendar year? Is it acceptable to pro-rate fuel use?

Yes, where "company records" are allowed to determine fuel consumption, it is acceptable to prorate using the December or January bills. The definition of "company records" allows use of billing records obtained from fuel suppliers and also requires you to keep a complete record of methods used and calculations performed to determine fuel usage.

Q50. When are reporters required to complete their GHG Monitoring Plan?

The EPA requires that the Monitoring Plan will be developed by no later than April 1, 2010, which is the date when the full monitoring approach will be implemented by most sources. The purpose of plan is to document the process and procedures for collecting and reviewing the data needed to estimate annual GHG emissions. Therefore, this plan needs to be in place prior to collecting data to ensure that consistent and accurate data are collected. The EPA estimates that 3 months is a reasonable time for a source to develop this plan since, as explained in the preamble to the final rule, 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. While some facilities may use best available methods to estimate GHG emissions for a period beyond 3 months (after April 1, 2010), facilities still need to have a plan developed for the basic procedures that will be used to collect data. A facility's data collection methods may change and evolve as the facility gains experience with monitoring equipment and develops more effective procedures for data management. Under the final rule, the Monitoring Plan must be revised to reflect these changes.

Q51. What representative of a reporting facility is in charge of reporting? For example, is it the operator or facility owner? What if a contractor operates a facility owned by someone else? Lastly, can a third party...

Q51. What representative of a reporting facility is in charge of reporting? For example, is it the operator or facility owner? What if a contractor operates a facility owned by someone else? Lastly, can a third party be hired to report on behalf of the reporting facility?

The rule applies to owners and operators of facilities that "...emit any greenhouse gas." If one person owns the emitting equipment and another person leases and operates it, then the parties are both responsible for reporting. The parties can choose among themselves who will collect and report the emissions data. The GHG Mandatory Reporting Rule provides owners and operators the flexibility to determine among themselves an appropriate Designated Representative to certify and submit the annual report.

Q53. Does this final rule preempt states from regulating or requiring reporting of greenhouse gases (GHGs)?

No. This rule does not preempt or replace state reporting programs. This rule has been developed in response to a specific request from Congress (in the Appropriations Act) and is narrower and more targeted than many existing state programs that are coupled with GHG emission reduction programs. Many state programs are broader in scope, in a more advanced state of development, and have different policy objectives than this rulemaking. EPA supports and recognizes the success and necessity of state programs as a vital component of achieving GHG emission reductions. EPA is committed to working with states and regional programs to coordinate implementation of reporting programs, reduce burden on reporters, provide timely access to verified emissions data, and harmonize data systems to the fullest extent possible.

Q54. Will data collection be delegated to state agencies?

EPA carefully considered the issue of state delegation, particularly in light of the leadership and experience of several states in developing greenhouse gas (GHG) reporting and reduction programs, and also in the context of the pressing need for a nationwide reporting program and the strong emphasis placed in the vast majority of the rule comments for EPA to ensure that data collection begins on January 1, 2010 and that data are reported early in 2011. We determined that developing a program to delegate to states would take additional time and would not be available for 2010 reporting, and we also determined that a significant number of states would likely not request delegation, which would increase the complexity of assembling a consistent national data set. For these reasons, we determined that the most effective way to achieve nationwide GHG reporting of 2010 data was for reporters to submit data directly to EPA, as proposed. While EPA is not formally delegating rule implementation and enforcement to states, we are committed to working in partnership with states to address the issues related to the interaction between state and federal reporting programs.

Q56. How is this reporting rule different from the Inventory of U.S. Greenhouse Gas Emissions and Sinks report (Inventory)?

The *Inventory* is a comprehensive top-down national assessment of national greenhouse gas (GHG) emissions, and uses national energy data and other national statistics. The use of the aggregated national data means that the national emissions estimates are not broken down at the geographic or facility level. In contrast, this reporting rule focuses on bottom-up data and individual sources above appropriate thresholds. While the rule will provide more specific data, it will not provide full coverage of total annual U.S. GHG emissions, as is required in the development of the *Inventory of U.S. Greenhouse Gas Emissions and Sinks* in reporting to the United Nations Framework Convention on Climate Change (UNFCCC). The *Inventory* is developed by EPA annually, in consultation with other U.S. agencies, as a required under the UNFCCC.

Q57. Will this rule negate the need for the Inventory of U.S. Greenhouse Gas Emissions and Sinks in the future?

No. The data collected under this rule will not replace the system in place to produce the comprehensive annual national greenhouse gas (GHG) inventory. However, it may serve as a useful tool to better improve the accuracy of future national-level inventories.

Q58. Would this rule need to be addressed in Title V operating permits?

Would this rule need to be addressed in Title V operating permits?

Currently, the Mandatory Reporting of Greenhouse Gases Rule requirements do not have to be incorporated into a facility's Title V permit. For an explanation of why Title V permits are not impacted by this rule, please see Section II.S (Summary of Comments and Responses on Other Legal Issues) in the preamble.

However, as part of a separate action, EPA proposed new regulatory requirements on September 30, 2009 that would establish thresholds for when Clean Air Act permits under the New Source Review and Title V operating permits programs would be required. For a copy of the proposed rule and additional information on this action, please see <http://www.epa.gov/nsr> or contact Mr. Joseph Mangino, Air Quality Policy Division, Office of Air Quality Planning and Standards (C504-03), Environmental Protection Agency, Research Triangle Park, NC 27711 (telephone number: (919) 541-9778; e-mail address: mangino.joseph@epa.gov).

Q59. How could the passing of the Waxman-Markey Bill affect this regulation?

The purpose of the Final Mandatory Reporting of Greenhouse Gases Rule is to provide accurate data for a range of future policy decisions. It is premature for EPA to speculate at this time on what legislation will be passed and the potential affect on the rule.

Q60. How will the GHG Reporting Rule fit in or be harmonized with state and local reporting obligations for criteria pollutants, toxics, and state-specific GHG reporting requirements?

Greenhouse gas emissions data collected under the Final Mandatory Reporting of Greenhouse Gases Rule will be appended to NEI/EIS (National Emissions Inventory/Emissions Inventory System), the agency repository for criteria and toxics emissions data. EPA expects that most facilities and suppliers reporting under the rule will already be in EIS. Where state GHG reporting requirements closely align with the mandatory reporting rule, EPA is working with states to share data and minimize the reporting burden. Where state GHG reporting requirements go beyond the mandatory reporting rule, EPA is working with states and stakeholders to explore options to harmonize reporting requirements.

Q61. How will data be efficiently shared among existing state greenhouse gas (GHG) programs and this new federal reporting program?

Reporting entities will report directly to EPA. In order to reduce the burden of reporting, EPA staff is working with states, stakeholders and the State-EPA Environmental Information Exchange Network on a data exchange standard for GHG emissions sharing. EPA is committed to working

with state and regional programs to provide timely access to verified emissions data, establish mechanisms to share data efficiently, and harmonize data systems to the extent possible. EPA intends to ensure GHG data collected and published by EPA in electronic format is compatible with the needs of states and other GHG stakeholders.

Q62. Where can I find more detailed information on the rule?

Federal Register copies of the rule and supporting documents may be found at www.regulations.gov or on the [Mandatory Greenhouse Gas Reporting Rule website](http://www.epa.gov/climatechange/emissions/ghgrulemaking.html), at www.epa.gov/climatechange/emissions/ghgrulemaking.html. The Federal Register docket number for this rule is Docket ID No. EPA-HQ-OAR-2008-0508.

An overview presentation for the rule, information sheets that explain the rule for a broad range of sectors, and other relevant information are available under the “Resources” section of our website for this rulemaking.

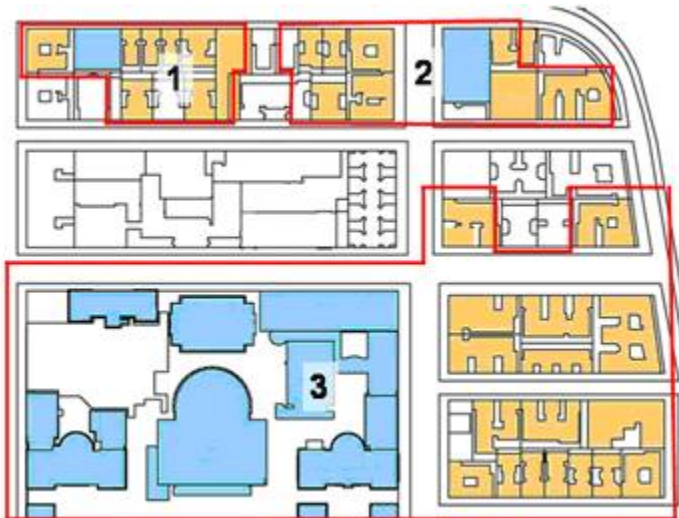
General and administrative questions about the rule can also be directed to EPA through the [Contact Us](#) page.

Q110. If two entities share a Title V permit would that preclude them from reporting separately even if there is no common ownership or control?

EPA has determined that the Title V definition of facility is not appropriate for this GHG reporting rule. The GHG rule serves a different purpose than Title V programs and therefore defines a facility in a way that is more inclusive of all large emitters. Under the facility definition in the GHG rule, if there is no common ownership or common control, then the facilities would be separate and their emissions would be reported separately.

Q126. If a campus is divided by several blocks of property not owned by the entity – can that area be defined as a facility by itself?

If the campus is separated as described, the campus would be defined as two facilities, because the properties are not contiguous or adjacent (i.e., not in actual physical contact) or separated solely by a roadway or other public right-of-way. In the example below, there are potentially 3 separate facilities that may need to report. These are labeled as #1, 2 and 3. #1 is a separate facility because there are other non-college affiliated buildings in-between it and #2. #2 is a separate facility from #3 because the intervening buildings render #2 as not being contiguous or adjacent to #3. If a steam line from #3 provided energy to the buildings in #1 and #2, the steam line would not make them one reporting facility. Each facility identified above would need to assess applicability independently. If heat input capacity of ALL units at a facility is less than 30 mmBtu/hr, the rule does not apply and no emission calculations are needed to determine applicability. If greater than 30 mmBtu/hr, then the facility would need to determine if emissions exceed the 25,000 metric ton CO₂e threshold.



Note: the blue buildings are academic buildings; the yellow buildings are non-academic and/or residential; the white buildings are not owned or operated by the college.

Q127. If a campus is divided by a non-owned body of water (e.g., a river), does that create two distinct facilities?

No. Separation by a public right-of-way (e.g., a road or river) does not break the continuity of the property that is under common ownership or control.

Q129. I leased space within my definition of "facility", if I do not track fuel use for that space, do I have to include it in my report?

The answer depends on who owns and operates the emitting equipment. Keep in mind that the "facility" is the emitting equipment not the property. If you own and operate the emitting equipment, then it must be included in the report (e.g., you lease a building and install a combustion unit). If you do not own or operate the equipment (e.g., hot water heaters or furnaces that come with the building) but just pay the fuel bill, then emissions from the equipment are not included.

Q130. I have space which I own, but lease to a third party within my "facility" and the tenant pays the utilities, do I have to include that building space?

It depends on who owns and operates the emitting equipment.

- If you own the equipment (e.g., furnaces, hot water heaters, incinerators), then you must include the equipment in your report. Even if the tenant pays the fuel bills, you must report the emissions.
- If the tenant leases space and installs and operates emitting equipment, then the equipment is not part of your facility.

Q131. Some entities may choose to report all greenhouse emissions for ease of data management, even if some sources do not meet the definition of "facility" and exceed the threshold. If cap and trade rules on greenhouse gas emissions are promulgated...

Q131. Some entities may choose to report all greenhouse emissions for ease of data management, even if some sources do not meet the definition of "facility" and exceed the threshold. If cap and trade rules on greenhouse gas emissions are promulgated in the future and GHG Reporting Rule data is used to establish a cap and trade system, could you speculate whether entities would be able to restate their emissions?

Your emissions report should be an accurate reflection of facility-wide emissions and should include emissions estimates following the methods outlined in the rule. We cannot speculate of the provisions of any future GHG regulatory program.

Q132. Provide one or two specific examples of what would be acceptable to EPA under §98.3(g)(5)(i)(B), "Explanation of processes and methods used to collect the necessary data for the GHG calculations".

The rule generally provides choices for how to collect or measure the data needed for inputs to the GHG calculation equations. In the monitoring plan, you need to describe the processes and methods you are using to collect the necessary data. For example, if you are using Tier 1 to determine CO₂ emissions from a stationary fuel combustion source under subpart C, you need to determine the annual mass or volume of fuel combusted during the reporting year for input to equation C-8. The rule specifies that you can use company records or a fuel flow meter to determine the amount of fuel combusted. "Company records" is broadly defined in 40 CFR 98.6. If you decide, for example, to use billing records to determine fuel usage from a boiler, then your monitoring plan could specify that you will obtain monthly bills from the natural gas supplier that show the quantity of gas delivered each month. It could describe any calculations you will do to prorate January and/or December bills to adjust for the amount of fuel burned in the calendar year if the billing cycle does not start on the 1st day of each month. And it could specify that you will add the monthly amounts to determine annual natural gas usage during the year, and that a second person will review the calculation for accuracy.

Q142. In the event fuel volume is based on third-party fuel billing meters that meet the exemption in 98.3 i 4, what are the record keeping requirements?

Q142. In the event fuel volume is based on third-party fuel billing meters that meet the exemption in 98.3(i)4, what are the record keeping requirements?

Per §98.3(i)(4), fuel billing meters are exempted from the calibration requirements of this section, unless otherwise required by another subpart of the rule, provided that the fuel supplier and any unit combusting the fuel do not have any common owners and are not owned by subsidiaries or affiliates of the same company. The GHG Monitoring Plan should reflect the source of the data and explain why the meters meet this provision, if applicable. In circumstances where a facility depends on third party fuel billing meters per §98.3(i)(4), the facility is not required to keep maintenance and quality assurance records for these meters in accordance with §98.3(g)(5)(C) and §98.3(g)(7). However, the fuel billing records that provide data for the GHG emissions calculations must be kept, in accordance with §98.3(g)(2).

Q155. How did EPA use input from stakeholders in the development of the proposed rule amendments?

Since October, 2009, EPA has been working closely with owners and operators of facilities to communicate the requirements of the Greenhouse Gas Reporting Program. Outreach activities consisted of webinars, live seminars, and an electronic hot-line. During that outreach, EPA received questions from affected facilities and other interested parties on each of the subparts being addressed in today's action. In addition, some of the proposed rule amendments relate to settlement agreements regarding challenges to the final rule by the American Chemistry Council, American Public Gas Association, the American Petroleum Institute/National Petrochemical and Refiner's Association, Energy Recovery Council, The Fertilizer Institute, and the Utility Air Regulatory Group. A separate Federal Register notice will be published soliciting comment on those settlement agreements.

Q179. Section 98.4(b) states the designated representative shall be an individual selected by an agreement binding on the owner or operator of the facility. What constitutes the "agreement"?

The rule does not dictate the form or, in any detail, the content of the agreement or the procedure used in entering into the agreement and thus provides flexibility for owners and operators in developing such an agreement. However, the agreement must have the effect of binding the owners and operators of the facility to the selection, as their designated representative for the facility, of the individual who is listed in the certificate of representation.

Q180. For subparts that were published on June 12, 2010, which are magnesium production (subpart T), underground coal mines (subpart FF), industrial wastewater treatment (subpart II) and...

Q180. For subparts that were published on June 12, 2010, which are magnesium production (subpart T), underground coal mines (subpart FF), industrial wastewater treatment (subpart II) and industrial landfills (subpart TT), when is the Certificate of Representation (COR) due?

Subparts T, FF, II, and TT facilities must submit their first GHG report to EPA on March 31, 2012 for 2011 emissions. They must submit their COR no later than 1/31/2012. These facilities, however, are encouraged to submit the COR early (e.g., fall 2011). Additional details on how to submit the COR can be found on the e-GGRT pages of the website (<http://www.epa.gov/climatechange/emissions/data-reporting-system.html>) and in the Resources by Subpart (<http://www.epa.gov/climatechange/emissions/subpart.html>) under each subpart.

Q181. When are the requests for use of Best Available Monitoring Methods (BAMM) for subparts T, FF, II, and TT due?

For subparts that were published on June 28, 2010, which are magnesium production (subpart T), underground coal mines (subpart FF), industrial wastewater treatment (subpart II) and industrial landfills (subpart TT), the BAMM request is due October 12, 2010. The use of BAMM will not be approved beyond December 31, 2011. Note: The rule does not automatically authorize use of BAMM for the first quarter of 2011 for subparts T, FF, II, and TT.

Q182. For subparts T, FF, II, and TT, is the use of Best Available Monitoring Methods (BAMM) automatically allowed for the first quarter of 2011 (January 1, 2011 to March 31, 2011)?

No, the use of BAMB is not automatically allowed for the first quarter of 2011 for subparts T, FF, II, and TT. Facilities must submit a request to use BAMB by October 12, 2010. The use of BAMB will not be approved beyond December 31, 2011.

Q278. My facility has completed its use of best available monitoring methods (BAMB) and is now fully following the methods in the final rule. Do and I need to notify EPA of this change?

Please note, there is no requirement to notify EPA when a facility or supplier no longer uses Best Available Monitoring Methods (BAMB) and fully follows the methods as outlined in the Greenhouse Gas Reporting rule. The facility or supplier's monitoring plan (which is a recordkeeping requirement) should reflect the methods and procedures that are being used to calculate GHG emissions, therefore the plan should reflect that BAMB is no longer being used.

Q284. The definition of "owner" and "operator" under 98.6 refers to a "person." Is a person only a single individual?

The first paragraph of 98.6 states, "All terms used in this part shall have the same meaning given in the Clean Air Act and this section." "Owner" and "operator" are specifically defined in 98.6 therefore you must use the definition of "owner" and "operator" as appears in 98.6. The final rule does not define the term "person." However, Section 7602(e) of the Clean Air Act states that the term "person" includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof. This definition of "person" applies to Part 98.

Q299. What does EPA mean by the term "sequential or simultaneous" in the definition of co-generation?

40 CFR Part 98 defines cogeneration to mean a unit that produces electrical energy and useful thermal energy for industrial, commercial, or heating or cooling purposes, through the sequential or simultaneous use of the original fuel energy. Co-generation systems may be "sequential or simultaneous" but in all cases cogeneration involves onsite generation of electricity and useful thermal energy and some form of waste heat recovery. For example, a gas turbine or reciprocating engine generates electricity by burning fuel (natural gas or biogas) and then uses a heat recovery unit to capture useful heat from the prime mover's exhaust stream. Alternatively, steam turbines generate electricity as a byproduct of steam generation through a fired boiler. There are also cogeneration systems in which the fuel input is first applied to a thermal process such as a furnace and at least some of the heat rejected from the process is then used for power production.

Q321. Does the roll-up calculator distinguish between direct emitters and suppliers?

Yes, the roll-ups for direct emitters and suppliers are performed separately. This reflects the fact that the emissions reporting requirements for direct emitting facilities are specified in 98.3(c)(4) and emissions reporting requirements for suppliers are specified in 98.3(c)(5).

Q388. Who must submit requests and one-time reports to EPA under Part 98?

For those facilities that have already registered with EPA and for which a certificate of representation (COR) has been submitted pursuant to §98.4(i), the designated representative (DR), any alternative designated representatives (ADR) or an agent included in the COR must submit requests (e.g., BAMB requests and requests to use provisional GWPs under subpart L) and one-time reports (e.g., the one-time report regarding PICs required by §98.126(i)).

If a complete COR has not yet been submitted for a facility (e.g., for those facilities first reporting in 2012, the COR is not due until January 31, 2012) then requests and one-time reports can be submitted by any person at the facility who can make the certification statements in §98.4(i) (4) on behalf of the facility.

Subpart C. General Stationary Fuel Combustion Sources

- Q44. There are currently no CEMS available at my facility. Is there a provision to allow calculations of Tier 1, 2 or 3 if the cost of purchasing and installing CEMS will be seriously detrimental to the company?
- Q64. Should pilot gas be included in greenhouse gas calculations?
- Q66. Where does no. 2 diesel fuel fit into Table C-1 and C-2?
- Q67. Where the heat input capacity of a combustion unit is less than 250 mm Btu per hour input capacity and the unit is not subject to Tier 3 or 4 per Subpart Y of Part 98, and where there might be more than one fuel type fed to...?
- Q68. 40 CFR §98.33(a)(3)(iii) indicates that "For units that combust municipal solid waste (MSW) and that produce steam, use Equation C-2c of this section". However, Table C-1...
- Q69. Does fuel use for comfort heating and hot water heaters need to be reported?

- Q70. Would fuels combusted in a test stand be considered as stationary fuel combustion when the articles being tested are mobile sources (aircraft, rocket, missile, spacecraft)?
- Q71. For CAIR-affected units that monitor SO₂ and NO_x emissions and Heat Input using the provisions of Part 75 Appendix D & E, but are not required to report CO₂ mass emissions, may Part 75 Appendix G be used for CO₂ reporting under Part 98?
- Q72. For a unit that currently uses gas monitors for other pollutants, but does not have a flow monitor, is it necessary to install and certify a flow monitor by March 31, 2010...?
- Q73. If a non-Acid Rain unit combusts coal or other solid fossil fuel and has gas monitors installed but does not have a stack flow monitor, is installation and certification of a stack flow monitor required?
- Q74. If a unit that combusts only fossil fuels has a CEMS for CO₂ and uses Tier 4, must CO₂ be reported by fuel type?
- Q75. For a unit that combusts fossil and biomass fuels that has a CEMS for CO₂ and uses Tier 4, must CO₂ be reported by fuel type?
- Q76. For a group of units that combusts only pipeline quality natural gas, may a shared fuel flow meter on a common pipe or gas supplier billing meter data be used to determine the CO₂ mass emissions for the group of units?
- Q77. For a unit that has an O₂ monitor and doesn't meet the conditions required to use Tier 4, but elects to use Tier 4, what are the monitoring requirements?
- Q78. For a source that has CEMS for other pollutants, but not for CO₂ mass measurement, and is required to use Tier 4, when must the monitors be installed and certified?
- Q80. If the HHV is known as part of a general energy management system, but not sampled on a routine basis, may Tier 1 be used?
- Q81. If a combustion unit is greater than 250 mmBtu per hour, combusts a biomass fuel listed in Table C-1, and receives HHV data at the required frequency in §98.34(a), may Tier 1 be used per 40 CFR 98.33(b)(1)(iii)?
- Q82. For a non-Acid Rain combustion turbine rated over 250 mmBtu per hour that only burns diesel oil and pipeline natural gas, is it acceptable to use Tier 2...
- Q83. For diesel fuel (e.g., No. 1 or No. 2 fuel oil) shipments that are received 1 or 2 times a year, is it sufficient to sample the fuel carbon content upon receipt of each shipment for Tier 3?
- Q84. For a unit that is not required to use Tier 4 (CEMS monitoring), which tier is required if you receive HHV with some coal shipments, but not every coal shipment?
- Q85. Is the use of Subpart C tiers required after 2010 and is it acceptable to use the best available monitoring provisions under Subpart A beyond 2010?
- Q86. Does Tier 3 have to be used if a unit is less than or equal to 250 mmBtu per hour, but has a continuous gas chromatograph to determine carbon content?
- Q87. What Tier, if any, must be used for a fuel not listed in Table C-1 that is less than 10% of the heat input of a combustion unit?
- Q88. If a combustion unit with a heat input capacity less than 250 mmBtu per hour burns both natural gas and a liquid fuel, and the quantities are known...
- Q89. Do facilities that are required to use the Tier 4 calculation methodology in subpart C have to apply for an extension under 98.3(d)(2) if they cannot get the appropriate equipment in place by March 31, 2010?
- Q90. Does EPA accept thermal flow meters for measuring volumetric flow rate under 98.34?
- Q91. Are orifice, venturi, and nozzle flow meters required to have temperature, and total pressure transmitters located on the flowmeters?
- Q92. For a unit that operates continuously with infrequent outages and will not be able to meet the April 1, 2010 deadline for the initial calibration of a Tier 3 fuel flow meter, does the facility have to request an extension from EPA?
- Q93. What should facilities do if the calibration error for fuel flow meters that exceeds the 5.0% performance specification?
- Q94. For Tier 3, if the equipment in place on January 1, 2010 is unable to measure carbon content and molecular weight of the fuel on a daily basis, must that equipment be replaced?
- Q95. If a facility has a billing meter for natural gas distributed to the combustion units throughout the facility, and if these combustion units also have their own meters, is there an obligation...
- Q96. Is there a recurring fuel flow meter calibration requirement for Tier 1 and Tier 2 units?
- Q97. Does the calibration exemption for fuel billing meters still apply for common pipe reporting option?
- Q133. Can I use more than 1 Tier Method for my facility?
- Q134. I have a natural gas emergency generator and a boiler in a building within the facility but no means to separate the usage out – how do I account for that, since the e-gen is not included?
- Q135. I have natural gas meter records for a building that uses natural gas for heating and cooking – but no separate meters – how do we account for that?
- Q137. I do not have a fuel meters at a building on the source, but know how much fuel is delivered. This is not the actual amount used, since my inventory at the beginning of the year may be different than the end – should I use the delivered amount?
- Q138. Please explain what High Heat Value (HHV) testing is and how a school's EH&S personnel would know if this is occurring?
- Q139. Would a boiler (or other combustion unit) that is mounted on a trailer or movable platform, that is used to provide temporary services while facility equipment is serviced, upgraded, or replaced, and where such equipment remains at the facility...
- Q140. Would the following be considered stationary or portable sources, assuming their location falls within the definition of facility?
- Q146. Many facilities use mass or volumetric flow meters to measure gaseous streams. Please confirm whether it is acceptable to use a mass flow meter to determine the volumetric flow rate of gaseous streams under Subpart C or the GHG Reporting Rule.
- Q148. With respect to coal or fuel oil, the rule requires analysis of at least one representative sample from each lot. Does EPA have any additional guidance on what constitutes a "lot?"
- Q149. If coal comes from the same source, how many deliveries must be analyzed to have a representative sample?
- Q307. How do you report a unit in e-GGRT that uses Tier 2 or 3 for part of the year and CEMS for the remainder of the year?
- Q308. How do you report in e-GGRT a fuel that changed calculation methodology from Tier 1 to Tier 2 for a given configuration during the middle of the year?
- Q322. To what precision should emission values for CO₂, N₂O, and CH₄ be reported in e-GGRT?
- Q323. If I am only reporting subpart C emissions for the 2010 reporting year, am I allowed to use the subpart C abbreviated reporting module?
- Q324. If a facility is eligible to use the subpart C abbreviated reporting form, is it required to or may it use the full subpart C reporting form?
- Q325. What are biogenic emissions?
- Q326. What are non-biogenic emissions?
- Q327. If multiple subparts apply to our sources such as subparts A, C, and D, are we reporting data under all three subparts?
- Q328. For Tier 4 configurations, if there is no missing data, do you still have to report total operating hours in the reporting year and zeros for hours in which substitute data was used?
- Q329. Is a blend of natural gas and biogas a unique fuel type that must be added?

- Q330. If a natural gas common pipe is connected to a series of small combustion units and a subpart D unit, how should emissions be reported?
- Q331. Am I required to report emissions for emergency generators?
- Q332. Is there a limit on the number of units or fuel types listed for an aggregation of units configuration?
- Q333. Can you change configuration types from year to year?
- Q334. Is there any flexibility in deciding what configuration type I can use for a unit or group of units?
- Q335. Am I required to enter emissions for each fuel type?
- Q337. If a facility is permitted to burn fuel of a certain type, is it required to identify that fuel type in e-GGRT?
- Q338. For Tier 3, if I have multiple combustion sources using a single fuel type, should I enter this as an aggregation of units?

Q44. There are currently no CEMS available at my facility. Is there a provision to allow calculations of Tier 1, 2 or 3 if the cost of purchasing and installing CEMS will be seriously detrimental to the company?

Only certain facilities are required to rely upon a continuous emissions monitoring system (CEMS). The six conditions that must be met in order for Tier 4 methodology to be required using CEMS are described in Section 98.33 (b)(4)(ii). One of the six conditions is that the unit has installed CEMS that are required either by an applicable Federal or State regulation or the unit's operating permit.

If a facility has a stationary combustion source and is required to report following Tier 4 methodology, the facility is required to begin reporting on January 1, 2010 using CEMS and the Tier 4 calculation methodology. If all of the monitors needed to measure CO₂ mass emissions have not been installed and certified by January 1, 2010, the facility has until January 1, 2011 to begin using Tier 4 methodology. In this case, the facility may use Tier 2 or Tier 3 methods to report GHG emissions for 2010, and the facility is not required to receive prior approval from EPA.

Q64. Should pilot gas be included in greenhouse gas calculations?

No. Section 98.30(a) defines a stationary fuel combustion source as a device that combusts "...solid, liquid, or gaseous fuel, generally for the purposes of producing electricity, generating steam, or providing useful heat or energy for industrial, commercial, or institutional use, or reducing the volume of waste by removing combustible matter.....". A pilot simply initiates the combustion process in a boiler, turbine, or other fuel combustion device, and is not used to produce electricity or steam, or to provide useful energy to an industrial process, or to reduce waste by removing combustible matter. Therefore, for the purposes of Part 98, a pilot is not considered to be a stationary fuel combustion source and pilot gas consumption is not required to be included in the GHG emissions calculations.

Q66. Where does no. 2 diesel fuel fit into Table C-1 and C-2?

Q66. Where does #2 diesel fuel fit into Table C-1 and C-2?

Diesel fuel falls under the classification of "Distillate Fuel oil (#1,2,3)."

Q67. Where the heat input capacity of a combustion unit is less than 250 mm Btu per hour input capacity and the unit is not subject to Tier 3 or 4 per Subpart Y of Part 98, and where there might be more than one fuel type fed to...?

Q67. Where the heat input capacity of a combustion unit is less than 250 mm Btu per hour input capacity and the unit is not subject to Tier 3 or 4 per Subpart Y of Part 98, and where there might be more than one fuel type fed to the same combustion unit, can the Tier 2 method be used to calculate emissions by using measured HHV values of input streams or a measured HHV of the mixed stream?

For fuels that are blended prior to combustion, you may: (1) use the weighted HHV value based on the relative proportion of each fuel in the blend and a weighted average CO₂ emission factor from Table C-1; or (2) use the HHV value determined by collecting and analyzing a representative sample of the blended fuel and using a weighted average CO₂ emission factor from Table C-1, based on the relative portion of each fuel in the blend. See 98.34(a)(3).

Q68. 40 CFR §98.33(a)(3)(iii) indicates that “For units that combust municipal solid waste (MSW) and that produce steam, use Equation C-2c of this section”. However, Table C-1...

Q68. 40 CFR §98.33(a)(3)(iii) indicates that “For units that combust municipal solid waste (MSW) and that produce steam, use Equation C-2c of this section”. However, Table C-1 indicates that the emission factor for Municipal Solid Waste fuel is “Allowed only for Units that do not generate steam and use Tier 1”.

The footnote is intended to reinforce that Tier 1 cannot be used for units that combust MSW and generate steam. For units that combust MSW and generate steam, Tier 2 and the respective default values from Table C-1 may be used for a unit of any size if the use of Tier 4 is not required.

Q69. Does fuel use for comfort heating and hot water heaters need to be reported?

Per 40 CFR 98.30, stationary fuel combustion units are devices that combust solid, liquid, or gaseous fuel, generally for the purposes of producing electricity, generating steam, or providing useful heat or energy for industrial, commercial, or institutional use. Building facility heaters, including comfort heating and water heaters that combust solid, liquid, or gaseous fuel meet this definition of a stationary fuel combustion source. Therefore, they must be included in determining rule applicability and included in annual reports if they are located at an industrial, commercial, or institutional facility that is subject to the rule. A comfort heater or hot water heater that is located at a residence would not meet the source category definition in 40 CFR 98.30 and would not need to be reported.

Q70. Would fuels combusted in a test stand be considered as stationary fuel combustion when the articles being tested are mobile sources (aircraft, rocket, missile, spacecraft)?

With respect to test stands, your facility may not be required to report emissions from these operations if they meet the definition of research and development exempted under 98.2(5). If the test stands do not meet this definition, the emissions must be reported, if your facility meets the applicability criteria listed in 40 CFR 98.2(a)(3).

Q71. For CAIR-affected units that monitor SO₂ and NO_x emissions and Heat Input using the provisions of Part 75 Appendix D & E, but are not required to report CO₂ mass emissions, may Part 75 Appendix G be used for CO₂ reporting under Part 98?

Yes. Equation G-4 in Appendix G of Part 75 may be used together with Equations F-12 and F-13 in Appendix F of Part 75 to quantify CO₂ mass emissions for the purposes of Part 98, provided that the unit monitors and reports heat input data to EPA year-round according to Appendix D of Part 75. (See §98.33(a)(5)(i) (A))

Q72. For a unit that currently uses gas monitors for other pollutants, but does not have a flow monitor, is it necessary to install and certify a flow monitor by March 31, 2010...?

Q72. For a unit that currently uses gas monitors for other pollutants, but does not have a flow monitor, is it necessary to install and certify a flow monitor by March 31, 2010 or may I calculate emissions for the first year and then use a CEMS and flow monitor for reporting in 2011?

If the unit and the currently installed gas monitors meet all six conditions specified in §98.33(b)(4)(ii), the unit is required to report CO₂ mass emissions using Tier 4. The use of Tier 4 begins on January 1, 2010, if all of the monitors needed to measure CO₂ mass emissions have been installed and certified by that date. If all of the required monitors have not been installed and certified by January 1, 2010, the unit is required to report CO₂ mass emissions using Tier 4 no later than January 1, 2011 and may use Tier 2 or Tier 3 to report emissions for 2010. If your facility meets the applicability requirements of 98.3(d)(3), you may submit an abbreviated report in 2011, for your 2010 emissions. If your facility qualifies to use the abbreviated report, you may use any Tier for quantifying emissions from stationary combustion in 2010.

Q73. If a non-Acid Rain unit combusts coal or other solid fossil fuel and has gas monitors installed but does not have a stack flow monitor, is installation and certification of a stack flow monitor required?

If the unit and the currently installed gas monitors meet all six conditions specified in §98.33(b)(4)(ii), then the Tier 4 methodology must be used, and a flow monitor must be installed and certified. The use of Tier 4 begins on January 1, 2010 if all of the monitors needed to measure CO₂ mass emissions have been installed and certified by that date. Otherwise, the unit is required to report CO₂ mass emissions using Tier 4 no later than January 1, 2011 and may use Tier 2 or Tier 3 to report emissions for 2010. If your facility meets the applicability requirements of 98.3(d)(3), you may submit an abbreviated report in 2011, for your 2010 emissions. If your facility qualifies to use the abbreviated report, you may use any Tier for quantifying emissions from stationary combustion in 2010.

Q74. If a unit that combusts only fossil fuels has a CEMS for CO₂ and uses Tier 4, must CO₂ be reported by fuel type?

No. Reporting CO₂ emissions by specific type of fossil fuel (e.g., coal, oil, gas, etc.) is not required. (See 98.36(b)(7)(i)).

Q75. For a unit that combusts fossil and biomass fuels that has a CEMS for CO₂ and uses Tier 4, must CO₂ be reported by fuel type?

The combined CO₂ from all fossil fuels must be reported separately from the combined CO₂ from all biomass fuels; however, reporting CO₂ by specific type of fuel (e.g., coal, oil, gas, etc.) is not required. (See 98.36(b)(7)(ii))

Q76. For a group of units that combusts only pipeline quality natural gas, may a shared fuel flow meter on a common pipe or gas supplier billing meter data be used to determine the CO₂ mass emissions for the group of units?

Yes. Fuel flow metering using a calibrated fuel flow meter on a common pipe (or calibrated fuel flow meters on a group of common pipes) or gas supplier billing meter data (from one or more billing meters) may be used to determine CO₂ mass emissions for a group of units sharing a common fuel supply (See §98.36(c)(3) and 98.34(b)(1)(iii)).

Q77. For a unit that has an O₂ monitor and doesn't meet the conditions required to use Tier 4, but elects to use Tier 4, what are the monitoring requirements?

If a facility elects to use Tier 4, then all of the Tier 4 requirements must be met. In this case, a stack flow monitor must be installed and certified, and the O₂ monitor may be used in lieu of installing and certifying a CO₂ monitor, provided that: (1) only fuels listed in Table 1 in section 3.3.5 of Part 75, Appendix F are combusted in the unit; and (2) the effluent stream does not include any CO₂ emissions from non-combustion processes or emission control systems. (See §98.33(a)(4)(iv)). However, the RATA of the O₂ monitor must be conducted on a %CO₂ basis comparing the calculated CO₂ concentrations to the CO₂ reference method. (See §98.34(c)(2))

Q78. For a source that has CEMS for other pollutants, but not for CO₂ mass measurement, and is required to use Tier 4, when must the monitors be installed and certified?

A Tier 4 unit is required to report CO₂ mass emissions beginning on January 1, 2010, if all of the monitors needed to measure CO₂ mass emissions have been installed and certified by that date. If all of the monitors needed to measure CO₂ mass emissions have not been installed and certified by January 1, 2010, the unit is required to report CO₂ mass emissions using Tier 4 no later than January 1, 2011 and use Tier 2 or Tier 3 to report emissions for 2010. If your facility meets the applicability requirements of 98.3(d)(3), you may submit an abbreviated report in 2011, for your 2010 emissions. If your facility qualifies to use the abbreviated report, you may use any Tier for quantifying emissions from stationary combustion in 2010.

Q80. If the HHV is known as part of a general energy management system, but not sampled on a routine basis, may Tier 1 be used?

If the HHV is not sampled at the minimum frequency required for Tier 2, as part of your routine operations, Tier 1 may be used if your units are 250 mmBtu/hr and the fuel is listed in Table C-1. However, if HHV data are obtained at the minimum required frequency, then either Tier 2 must be used, or you may opt to use Tier 3 or 4. (See, §§98.33(b)(1), and 98.34(a))

Q81. If a combustion unit is greater than 250 mmBtu per hour, combusts a biomass fuel listed in Table C-1, and receives HHV data at the required frequency in §98.34(a), may Tier 1 be used per 40 CFR 98.33(b)(1)(iii)?

No. For a unit of any size that combusts biomass, if HHV is sampled at the minimum frequency required for Tier 2 as part of routine operations, Tier 1 may not be used for determining the CO₂ emissions from the combustion of biomass. Tier 2 must be used instead. (See §§98.33(b)(1)(iv), and 98.34(a))

Q82. For a non-Acid Rain combustion turbine rated over 250 mmBtu per hour that only burns diesel oil and pipeline natural gas, is it acceptable to use Tier 2...

Q82. For a non-Acid Rain combustion turbine rated over 250 mmBtu per hour that only burns diesel oil and pipeline natural gas, is it acceptable to use Tier 2 to calculate CO₂ emissions? Is the use of Tier 2 also allowed if the turbine combusts only one of these fuels?

Yes, to both questions. Tier 2 may be used in a unit with a maximum rated heat input capacity greater than 250 mmBtu/hr for the combustion of pipeline natural gas and/or distillate fuel oil. (See §98.33(b)(2)(ii) and the definition of "distillate fuel oil" in §98.6.)

Q83. For diesel fuel (e.g., No. 1 or No. 2 fuel oil) shipments that are received 1 or 2 times a year, is it sufficient to sample the fuel carbon content upon receipt of each shipment for Tier 3?

Yes, for fuel oil, at least one sample must be obtained from each fuel lot. (See §98.34(b)(3)(ii)(B)) However, if fuels from different shipments are blended prior to combustion, either: (a) a sample must be taken after the fuels have been mixed, or (b) a weighted value of the measured parameter (e.g., carbon content) must be calculated based on the relative proportions of each fuel in the blend. (See §98.34(b)(3)(v))

Q84. For a unit that is not required to use Tier 4 (CEMS monitoring), which tier is required if you receive HHV with some coal shipments, but not every coal shipment?

If the unit is less than or equal to 250 mmBtu/hr, since you do not obtain HHV at the minimum frequency specified in §98.34(a), you may use Tier 1 to calculate CO₂ mass emissions. However, if the unit is greater than 250 mmBtu/hr, then you must ensure that the carbon content of each shipment is determined and use Tier 3. (See §98.34(b)(3)(ii)(B)).

Q85. Is the use of Subpart C tiers required after 2010 and is it acceptable to use the best available monitoring provisions under Subpart A beyond 2010?

Yes, the use of Subpart C Tiers is required after 2010. The use of best available monitoring methods as described in Subpart A may not be extended beyond the end of 2010. (See §98.3(d)(2)(iii)).

Q86. Does Tier 3 have to be used if a unit is less than or equal to 250 mmBtu per hour, but has a continuous gas chromatograph to determine carbon content?

Tier 3 is not required for any unit that is less than or equal to 250 mmBtu/hr, however a source may opt to use Tier 3 if it has the capability of determining carbon content and (if applicable) molecular weight at the required frequency specified in §98.34(b).

Q87. What Tier, if any, must be used for a fuel not listed in Table C-1 that is less than 10% of the heat input of a combustion unit?

If the unit is less than or equal to 250 mmBtu/hr, GHG emissions reporting is not required if the fuel or the fuel constituents are not listed in Table C-1. However, if the unit is greater than 250 mmBtu/hr, CO₂ emissions reporting for a fuel not listed in Table C-1 is required, using Tier 3, if: (1) combustion of the fuel accounts for 10% or more of the combustion unit's annual heat input; and (2) the unit is not required to use Tier 4. This response applies only to units that calculate CO₂ emissions in accordance with Subpart C.

Q88. If a combustion unit with a heat input capacity less than 250 mmBtu per hour burns both natural gas and a liquid fuel, and the quantities are known...

Q88. If a combustion unit with a heat input capacity less than 250 mmBtu per hour burns both natural gas and a liquid fuel, and the quantities are known can Tier 1 be used for the natural gas calculations and Tier 2 for the liquid or must Tier 2 be used for both?

The tiering requirements are applied to each fuel in a combustion unit, not to the combustion unit as a whole. Therefore, in this example, different tier calculation methods can be used for the natural gas and the liquid fuel combusted in the same combustion unit.

Q89. Do facilities that are required to use the Tier 4 calculation methodology in subpart C have to apply for an extension under 98.3(d)(2) if they cannot get the appropriate equipment in place by March 31, 2010?

No, if all of the required monitors have not been installed and certified by January 1, 2010, the unit is required to report CO₂ mass emissions using Tier 4 no later than January 1, 2011 and may use Tier 2 or Tier 3 to report emissions for 2010.

If your facility meets the applicability requirements of section 98.3(d)(3), you may submit an abbreviated report in 2011, for your 2010 emissions. If your facility qualifies to use the abbreviated report you may use any Tier for quantifying emissions from stationary combustion in 2010.

Q90. Does EPA accept thermal flow meters for measuring volumetric flow rate under 98.34?

The MRR does not specify equipment type but rather lists standard methods used to quality assure fuel flow meter. Any fuel flow meter that can be calibrated based on one of the methods specified in 98.34 (b)(4) is acceptable. The calibration may be conducted by the reporter or an independent third party so long as the standard method is adhered to and the calibration does not deviate from the method.

Q91. Are orifice, venturi, and nozzle flow meters required to have temperature, and total pressure transmitters located on the flowmeters?

For orifice, nozzle and venturi flow meters, the use of representative values for temperature and total pressure is allowed in situations where there are no existing transmitters to measure these parameters at the flow meter location. Rather than requiring additional transmitters to be installed and calibrated in close proximity to the flow meter, reporters shall apply suitable correction factors to temperature and/or total pressure readings made at a remote location (or locations), to represent conditions at the flow meter.

Q92. For a unit that operates continuously with infrequent outages and will not

be able to meet the April 1, 2010 deadline for the initial calibration of a Tier 3 fuel flow meter, does the facility have to request an extension from EPA?

No. According to §§98.3(i) (6) and 98.34(b)(1)(v), the owner or operator may postpone the initial calibration until the next scheduled maintenance outage in such cases. Such postponements shall be documented in the monitoring plan that is required under §98.3(g)(5).

Q93. What should facilities do if the calibration error for fuel flow meters that exceeds the 5.0% performance specification?

For a fuel flow meter that either has not met, or may not be able to meet the 5.0% calibration error specification, the “best available monitoring method” (BAMM) may be used until April 1, 2010. You may request to use the BAMM through the remainder of 2010, as described in §98.3(d). However, for a fuel flow meter that cannot meet the calibration specification, the meter must either be replaced or modified to meet the specification by the time that the allowable use of the BAMM has expired.

Q94. For Tier 3, if the equipment in place on January 1, 2010 is unable to measure carbon content and molecular weight of the fuel on a daily basis, must that equipment be replaced?

Existing equipment that is not capable of automatically providing daily measurements of carbon content (CC) and molecular weight (MW) need not be replaced or upgraded. For Tier 3 units that do not have the necessary equipment in place for daily CC and MW measurements as of January 1, 2010, weekly sampling is required.

Q95. If a facility has a billing meter for natural gas distributed to the combustion units throughout the facility, and if these combustion units also have their own meters, is there an obligation...

Q95. If a facility has a billing meter for natural gas distributed to the combustion units throughout the facility, and if these combustion units also have their own meters, is there an obligation under the rule to use the individual unit meters and with this the more stringent calibration requirements for each meter?

You would not be required to use the individual unit meters provided you qualify to report under either 40 CFR 98.36(c)(1) (i.e., aggregation of units) or 40 CFR 98.36(c)(3) (i.e., common pipe configuration). However, you must use the highest applicable Tier method to calculate emissions from all of the grouped combustion units.

Q96. Is there a recurring fuel flow meter calibration requirement for Tier 1 and Tier 2 units?

EPA does not intend for the calibration requirements of 98.3(i) to apply to any units where the rule allows the use of “company records” to quantify fuel usage or other parameters. Therefore, initial and ongoing calibration requirements do not apply to units using Tier 1 and Tier 2, or to solid fuel-fired units using Tier 3. Although there are no specific calibration requirements for Tier 1 and Tier 2, your GHG monitoring plan must include descriptions of the procedures and methods used for quality assurance, maintenance, repair of all flow meters and any other instrumentation used to measure fuel consumption. For additional information on the content of the GHG Monitoring Plan, please see 40 CFR 98.3(g)(5) and Section M.2 in the preamble.

Q97. Does the calibration exemption for fuel billing meters still apply for common pipe reporting option?

Yes, the calibration exemption applies to billing meters that supply fuel via a common pipe.

Q133. Can I use more than 1 Tier Method for my facility?

Yes. The tier methodology applies to each unit and to each fuel combusted in a unit. Therefore, you can use different tiers for different units and different tiers for different fuels in a co-fired unit (providing that an allowable tier method is used in each situation). The exception is if you use common pipe provisions for multiple units. In this case, you must use the highest tier method that applies to any unit within the aggregated group for which you use the common pipe provision.

Q134. I have a natural gas emergency generator and a boiler in a building within the facility but no means to separate the usage out – how do I account for that, since the e-gen is not included?

You have two options. (1) You may elect to include the emissions from the emergency generator. (2) If you choose to exclude these emissions, then you may use "company records" to determine the fuel flow to the emergency generator and deduct this volume from the total annual volume of fuel. When using company records, you have flexibility to use any credible method to determine fuel use (e.g., hours of operation and maximum fuel flow rate), but you must document the method in the Monitoring Plan and retain appropriate records to document fuel use in the emergency equipment.

Q135. I have natural gas meter records for a building that uses natural gas for heating and cooking – but no separate meters – how do we account for that?

For units that burn a common fuel and are served by a common pipe, you are not required to meter each unit separately. This provision applies regardless of the size of the units.

Q137. I do not have a fuel meters at a building on the source, but know how much fuel is delivered. This is not the actual amount used, since my inventory at the beginning of the year may be different than the end – should I use the delivered amount?

No. If using company records rather than meters, you must accurately determine fuel consumption during the calendar year. In this case, you would adjust deliveries to account for beginning and ending inventories.

Q138. Please explain what High Heat Value (HHV) testing is and how a school's EH&S personnel would know if this is occurring?

If the supplier uses a method cited in the rule, provides the data at the required frequency and supplies the necessary records describing the methods used and frequency, Tier 2 is required.

Q139. Would a boiler (or other combustion unit) that is mounted on a trailer or movable platform, that is used to provide temporary services while facility equipment is serviced, upgraded, or replaced, and where such equipment remains at the facility...

Q139. Would a boiler (or other combustion unit) that is mounted on a trailer or movable platform, that is used to provide temporary services while facility equipment is serviced, upgraded, or replaced, and where such equipment remains at the facility for > 12 months, still be considered portable and not subject to the reporting rule?

If the fuel-burning equipment on the trailer or moveable platform is moved to different locations on campus during the year as different facility equipment is serviced, then it is considered portable. If the fuel-burning equipment remains in the same spot for more than 12 consecutive months, then it is not considered portable per the definition of "portable" in 40 CFR 98.6.

Q140. Would the following be considered stationary or portable sources, assuming their location falls within the definition of facility?

Q140. Would the following be considered stationary or portable sources, assuming their location falls within the definition of facility?

- **Gas-fired stove in a student or faculty residence?**
- **Industrial gas-fired stove in a campus dining hall?**
- **Gas-fired laundry dryer in a student or faculty residence?**
- **Gas or oil fired hot water heater in a student or faculty residence?**

All of these are stationary fuel combustion sources.

Q146. Many facilities use mass or volumetric flow meters to measure gaseous streams. Please confirm whether it is acceptable to use a mass flow meter to determine the volumetric flow rate of gaseous streams under Subpart C or the GHG Reporting Rule.

Fuel flow meters that measure mass flow rates may be used, provided that the fuel density is used to convert the readings to volumetric flow rates.

Q148. With respect to coal or fuel oil, the rule requires analysis of at least one representative sample from each lot. Does EPA have any additional guidance on what constitutes a "lot?"

Per 98.34(b)(3)(ii)(B), a fuel lot is "a shipment or delivery of a single fuel (e.g., ...group of trucks, group of railroad cars, etc.)." Sampling of the HHV or carbon content of the fuel must be representative of the coal or fuel oil delivered in a group of trucks, taking into account the origin of the coal or fuel oil (e.g., the same mine or different mines, same terminal batch of oil).

Q149. If coal comes from the same source, how many deliveries must be analyzed to have a representative sample?

If multiple shipments of coal or fuel oil from the same supply source are received in a particular calendar month, the deliveries for that month are considered to be a "fuel lot" requiring analysis of only one representative sample.

Q307. How do you report a unit in e-GGRT that uses Tier 2 or 3 for part of the year and CEMS for the remainder of the year?

You are required to add two configurations for the same unit. The first configuration represents when Tier 2 or 3 is used to calculate emissions and the second configuration represents the CEMS. You must specify the respective calculation methodology period for each configuration as appropriate. You also must identify the change in calculation methodology in the subpart A reporting module.

Q308. How do you report in e-GGRT a fuel that changed calculation methodology from Tier 1 to Tier 2 for a given configuration during the middle of the year?

You must add the fuel twice for the configuration. Each addition of the fuel should specify a different calculation methodology and the calculation methodology periods should be discrete. You also must identify the change in calculation methodology in the subpart A reporting module. This approach is valid when switching between Tiers 1, 2, or 3. If switching from Tiers 1, 2, or 3 to Tier 4, a new configuration would have to be added.

for when the methodology was switched to Tier 4.

Q322. To what precision should emission values for CO₂, N₂O, and CH₄ be reported in e-GGRT?

All CO₂ and CO₂ equivalent values should be reported with precision to the nearest ton. When reporting CH₄ and N₂O emissions in tons of each respective gas, CH₄ emissions should be reported with two decimal places and N₂O emissions should be reported with three decimal places. After factoring in the GWP for CH₄ and N₂O, the emissions reported for each gas will have a precision on the same order as values reported for CO₂ equivalents.

Q323. If I am only reporting subpart C emissions for the 2010 reporting year, am I allowed to use the subpart C abbreviated reporting module?

Yes, if you are only reporting emissions under subpart C for the 2010 reporting year and not for any other subparts, you may use the subpart C abbreviated reporting module instead of the complete subpart C reporting module.

Q324. If a facility is eligible to use the subpart C abbreviated reporting form, is it required to or may it use the full subpart C reporting form?

The abbreviated reporting form is only ever an option, and is never required.

Q325. What are biogenic emissions?

Biogenic emissions include CO₂ emissions from biomass fuels and the biogenic portion of CO₂ emissions from fuels with a fossil and biomass component (i.e., MSW and tires). You are only required to report on biogenic emissions for which emissions calculations are required by an applicable subpart.

Q326. What are non-biogenic emissions?

Non-biogenic emissions include CO₂ emissions from the combustion of fossil fuels, CO₂ emissions from the use of sorbent, CO₂ emissions from other non-combustion processes covered in Part 98, and the portion of CO₂ from fuels with a fossil and biomass component (i.e., MSW and tires) that is considered fossil in origin.

Q327. If multiple subparts apply to our sources such as subparts A, C, and D, are we reporting data under all three subparts?

Yes, you would be required to report data for each applicable subpart at a facility. Units subject to subpart D would not need to be separately identified and reported under subpart C, but if a facility contains subpart C units and subpart D units, the units should be reported under subparts C and D in e-GGRT, respectively.

Q328. For Tier 4 configurations, if there is no missing data, do you still have to report total operating hours in the reporting year and zeros for hours in which substitute data was used?

Yes, you must report the number of source operating hours and you should enter zero for each missing data element in which substitute data was not used.

Q329. Is a blend of natural gas and biogas a unique fuel type that must be added?

The reporting requirement depends on what information is known about the relative portions of each fuel. If the fuels to be blended are received separately and if the quantity of each fuel is measured before the fuels are mixed and combusted, then calculate and report the CO₂ mass emissions separately for each fuel that is blended. If the fuel is received as a blend, or if the components are mixed on site, and the precise quantity of each fuel is not measured or known, then the use of the blended fuel type should be used.

Q330. If a natural gas common pipe is connected to a series of small combustion units and a subpart D unit, how should emissions be reported?

As described in 40 CFR 98.36(c)(3), the common pipe reporting configuration may be used for the small combustion units. If a portion of the fuel serving a common pipe is diverted to a flare, another stationary fuel combustion unit (or units), a chemical or industrial process, or a Part 75 unit (Subpart D or 98.33(a)(5)), company records may be used to subtract out the diverted fuel stream from the fuel served to the units in the common pipe configuration. The emission reporting for the subpart D unit would be unaffected by how the emissions are calculated for the common pipe configuration.

Q331. Am I required to report emissions for emergency generators?

Emergency generators are exempted from reporting emissions under subpart C if the equipment meets the following definition: "Emergency generator means a stationary combustion device, such as a reciprocating internal combustion engine or turbine that serves solely as a secondary source of mechanical or electrical power whenever the primary energy supply is disrupted or discontinued during power outages or natural disasters that are beyond the control of the owner or operator of a facility. An emergency generator operates only during emergency situations, for training of personnel under simulated emergency conditions, as part of emergency demand response procedures, or for standard performance testing procedures as required by law or by the generator manufacturer. A generator that serves as a back-up power source under conditions of load shedding, peak shaving, power interruptions pursuant to an interruptible power service agreement, or scheduled facility maintenance shall not be considered an emergency generator". If the definition of emergency generator is not satisfied, then the equipment is required to be reported under subpart C.

Q332. Is there a limit on the number of units or fuel types listed for an aggregation of units configuration?

There is no limit to the number of units included in an aggregation of units configuration provided that each unit is smaller than 250 mmBtu/hr. In addition, there is no limit on the number of fuel types consumed in the aggregation of units configuration so long as each fuel type is only using one calculation methodology during discrete periods of time. It is possible to change methodologies during the year for a given fuel type, but more than one methodology may not be used at any given time for that fuel type.

Q333. Can you change configuration types from year to year?

Yes, you may change configurations from year to year if you satisfy the requirements for that configuration. In some circumstances it may be possible to switch configuration types mid-year (for example, if you switched from Tier 2 to Tier 4 within the year).

Q334. Is there any flexibility in deciding what configuration type I can use for a unit or group of units?

It is possible, and in many cases likely, that a facility may have the option of choosing from a range of configuration types under which to report emissions. However, it is also possible that only one configuration type would be a valid selection. The reporter should review 40 CFR 98.36 to determine what configuration types are appropriate. If more than one configuration is valid for a group of units, the reporter may freely decide which configuration type to use. For example, if a group of units combusts natural gas fed by a common pipe, and all units are smaller than 250 mmBtu/hr, the reporter could select to report the group of units under the common pipe or aggregation of units configuration types.

Q335. Am I required to enter emissions for each fuel type?

Yes, for fuels calculating emissions according to Tiers 1, 2, or 3, the reporting of fuel specific emissions for CO₂, CH₄, and N₂O is generally required. For units calculating emissions according to Tier 4 or part 75 methodologies, the reporting of CH₄ and N₂O by fuel type is generally required.

Q337. If a facility is permitted to burn fuel of a certain type, is it required to identify that fuel type in e-GGRT?

No, you are only required to identify fuel types for which you calculated emissions according to Part 98.

Q338. For Tier 3, if I have multiple combustion sources using a single fuel type, should I enter this as an aggregation of units?

While it is possible for an aggregation of units to use Tier 3 for certain fuel types, it is important to remember that the aggregation of units option is

only allowed if each unit in the group is smaller than 250 mmBtu/hr. If the use of Tier 3 is required because any given unit is larger than 250 mmBtu/hr, the use of the aggregation of units option would not be allowed.

Subpart D. Electricity Generation

- Q309. Will e-GGRT import any data from Electronic Data Reports (EDRs) or CAMD?
- Q339. Will a subpart D unit that co-fires biogas have to set up both Subpart D and C modules to calculate the biogenic CO₂ per 98.33?
- Q340. Are CAIR units part of Subpart D reporting?

Q309. Will e-GGRT import any data from Electronic Data Reports (EDRs) or CAMD?

No, e-GGRT will not import any data from EDRs or CAMD. Facilities must report all required elements in e-GGRT, even if already reported under a different EPA program.

Q339. Will a subpart D unit that co-fires biogas have to set up both Subpart D and C modules to calculate the biogenic CO₂ per 98.33?

No, if a subpart D unit combusts biomass, the biomass emissions will be reported under subpart D and not subpart C.

Q340. Are CAIR units part of Subpart D reporting?

Units that are not in the Acid Rain Program and that do not report CO₂ mass emissions year round are not included in subpart D. CAIR units that do not meet the source definition for subpart D would be reported under subpart C if located at a facility that is required to submit an emissions report.

Subpart L. Fluorinated Gas Production

- Q387. Are processes with scrubbers that decompose F-GHGs required to submit the one-time report required by §98.126i, even though they have no combustion control device and do not technically emit "PICs" from the scrubber vent ?

Q387. Are processes with scrubbers that decompose F-GHGs required to submit the one-time report required by §98.126i, even though they have no combustion control device and do not technically emit "PICs" from the scrubber vent ?

Fluorinated gas production facilities that destroy fluorinated gases must submit the one-time report required under §98.126(i) even if they use destruction technologies other than thermal oxidation, such as caustic scrubbers.

§98.126(i) reads as follows:

Each fluorinated gas production facility that destroys fluorinated gases must submit a one-time report by June 30, 2011, that describes any measurements, research, or analysis that it has performed or obtained that relate to the formation of products of incomplete combustion that are fluorinated GHGs during the destruction of fluorinated gases. The report must include the methods and results of any measurement or modeling studies, including the products of incomplete combustion for which the exhaust stream was analyzed, as well as copies of relevant scientific papers, if available, or citations of the papers, if they are not. No new testing is required to fulfill this requirement.

If the facility hasn't "performed or obtained" "measurements, research, or analysis that relate to the formation of PICs that are F-GHGs" (e.g., because its only destruction devices are caustic scrubbers) then the facility can simply note this in its report.

Subpart O. HCFC-22 Production and HFC-23 Destruction

- Q291. On March 18, 2011, EPA extended the deadline for reporting 2010 GHG data from March 31, 2011 to September 30, 2011. Does this extension also apply to the one-time reports that are due on March 31, 2011, and that are required under subpart O...

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Q291. On March 18, 2011, EPA extended the deadline for reporting 2010 GHG data from March 31, 2011 to September 30, 2011. Does this extension also apply to the one-time reports that are due on March 31, 2011, and that are required under subpart O at §98.156(e)? If not, then how and where should these reports be submitted?

The March 18, 2011 deadline extension applies only to the annual GHG reports required under §98.3(b) (or the abbreviated report under 98.3(d)(3)). EPA has not extended the deadlines for other reports described in other subparts, such as the one-time reports required under subpart O at §98.156(e). The deadline for submitting these reports to EPA remains March 31, 2011 (or another deadline specified in subpart O, e.g., within 60 days of commencing fluorinated GHG destruction).

EPA has prepared optional spreadsheets that facilities and suppliers may use to submit their one-time reports under subpart O. Reporters may obtain a copy of the spreadsheets here: <http://epa.gov/climatechange/emissions/subpart/o.html>

Facilities and suppliers must submit these one-time reports on a CD (preferred) or in hard copy to the address specified in §98.9 for all requests, notifications, and communications with the Administrator (other than the annual GHG report):

- (a) For U.S. mail: Director, Climate Change Division, 1200 Pennsylvania Ave, NW, Mail Code: 6207J, Washington, DC 20460
- (b) For package deliveries: Director, Climate Change Division, 1310 L St., NW., Washington, DC 20005

To permit us to quickly identify the one-time reports, facilities and suppliers are encouraged to write "ATTN: Subpart O One-Time Report" on the bottom left side of the envelope.

Subpart P. Hydrogen Production

- [Q341. Does subpart P require me to account for ammonia emitted as an air emission?](#)

Q341. Does subpart P require me to account for ammonia emitted as an air emission?

You are required to report the annual quantity of ammonia produced for each hydrogen production process unit, if applicable, as required by 40 CFR 98.166(a)(3) and (b)(4).

Subpart Y. Petroleum Refineries

- [Q123. For petroleum refineries, which subpart should be followed for flare calculations? Section 98.252\(a\) says to use Subpart C. However, section 98.253\(b\) specifies a method for flares.](#)
- [Q342. Are you required to submit information for all of the "facility-level emissions" categories within Subpart Y, even if no emissions exist for some categories?](#)
- [Q345. For storage tank emissions reported in Subpart Y, do you enter aggregate emissions or emissions on a tank-by-tank basis?](#)

Q123. For petroleum refineries, which subpart should be followed for flare calculations? Section 98.252(a) says to use Subpart C. However, section 98.253(b) specifies a method for flares.

Under Subpart Y, GHG emissions from flares must be calculated using the methods provided in 40 CFR 98.253(b).

Q342. Are you required to submit information for all of the "facility-level

emissions" categories within Subpart Y, even if no emissions exist for some categories?

Yes, all the "facility-level emissions" categories within Subpart Y should be completed in e-GGRT. If a certain emissions category does not apply to your facility, you should still complete that section and indicate zero emissions emitted, where applicable.

Q345. For storage tank emissions reported in Subpart Y, do you enter aggregate emissions or emissions on a tank-by-tank basis?

Emissions are reported on an aggregated, facility-wide basis for storage tanks, but are split into two categories: (1) storage tanks that are not used for unstabilized crude oil and (2) storage tanks that are used to store unstabilized crude oil. The e-GGRT system does not allow for tank-by-tank emissions reporting.

Subpart AA. Pulp and Paper Manufacturing

- Q125. The definition of the source category for Pulp and Paper is relatively broad to include a range of pulp and paper manufacturing activities. If a facility falls under the definition of 98.270 (a) but...
- Q310. For subpart AA in e-GGRT, on the screen to enter CO₂ emissions from makeup chemicals, why are there two boxes to check?
- Q311. For subpart AA in e-GGRT, can a reporter add multiple instances of makeup chemical use?
- Q346. Is a paper making company required to report GHG emissions under Subpart AA if the only source of emissions is on -site combustion?

Q125. The definition of the source category for Pulp and Paper is relatively broad to include a range of pulp and paper manufacturing activities. If a facility falls under the definition of 98.270 (a) but...

Q125. The definition of the source category for Pulp and Paper is relatively broad to include a range of pulp and paper manufacturing activities. If a facility falls under the definition of 98.270 (a) but does not contain emission units specified in 98.270(b) for which greenhouse gas emissions must be reported, is such a facility subject Subpart AA?

No. You are only subject to Subpart AA if you have emissions units listed in 98.270(b) and meet the applicability criteria for pulp and paper manufacturing.

Q310. For subpart AA in e-GGRT, on the screen to enter CO₂ emissions from makeup chemicals, why are there two boxes to check?

In accordance with the procedures for missing data for subpart AA (section 98.275), owners or operators are required to keep records of the procedures used to account for missing data and the boxes to check in e-GGRT are provided to indicate if a substitute value was used for the annual quantity of CaCO₃ and Na₂CO₃ to calculate the CO₂ emissions from makeup chemicals. Similarly, other subpart AA screens provide check boxes to indicate if substitute values were used for the mass of spent liquor solids used to calculate biogenic CO₂, CH₄ and N₂O emissions using equations AA-1 and AA-2.

Q311. For subpart AA in e-GGRT, can a reporter add multiple instances of makeup chemical use?

No. The mill-wide total makeup chemical use is to be provided for the year. Emissions associated with makeup chemical use are calculated based on the quantity of CaCO₃ and/or Na₂CO₃ used at the facility for the reporting year. In the event of multiple instances of makeup chemical use, the reporter will need to keep a separate record of the quantity of CaCO₃ and/or Na₂CO₃ used in each instance (or for each pulping line) in order to determine the mill-wide total quantity used for the reporting year.

Q346. Is a paper making company required to report GHG emissions under Subpart AA if the only source of emissions is on -site combustion?

No. Subpart AA only requires data reporting for chemical recovery furnaces at kraft and soda mills, chemical recovery combustion units at sulfite facilities, chemical recovery combustion units at stand-alone semichemical facilities, pulp mill lime kilns at kraft and soda facilities, and systems for adding makeup chemicals (CaCO₃, Na₂CO₃) in the chemical recovery areas of chemical pulp mills. If the only source of emissions at a paper mill is on-site combustion (in a boiler, for example), reporting under subpart AA would not be required. Reporting under subpart C might be required if the facility emits 25,000 metric tons CO₂e (excluding biogenic CO₂) or more per year in combined emissions from all stationary combustion sources.

Subpart FF. Underground Coal Mines

- Q288. Do small, non-gassy mines need to report MSHA samples quarterly even though they are not specifically required to?

Q288. Do small, non-gassy mines need to report MSHA samples quarterly even though they are not specifically required to?

According to Table A-3 of subpart A of Part 98, all underground coal mines that are subject to quarterly or more frequent sampling by Mine Safety and Health Administration (MSHA) of ventilation systems (subpart FF) must report, regardless of size.

This threshold was based on EPA's understanding that quarterly sampling by MSHA was only done at the largest, gassiest mines, defined as those emitting more than 100,000 cubic feet (cf) CH₄ per day. For example, the proposal preamble states, "We propose that all active underground coal mines for which CH₄ from the ventilation system is sampled quarterly by MSHA (or on a more frequent basis), are required to report under this rule. MSHA conducts quarterly testing of CH₄ concentration and flow at mines emitting more than 100,000 cf CH₄ per day. We selected this threshold because subjecting underground mine operators to a new emissions-based threshold is unnecessarily burdensome, as many of these mines are already subject to MSHA regulations. The MSHA threshold for reporting of 100,000 cf CH₄ per day covers approximately 94 percent of the CH₄ emitted from underground coal mine ventilation systems and about 86 percent of total emissions from underground mining (including stationary fuel combustion emissions at mine sites, as shown in Table FF-1 of this preamble)."

In the proposal preamble, we estimated that this threshold covers only about 128 of the estimated 612 active underground mines in the United States (74 FR 16553). Although it was not evident in reviewing the public comments received on the proposed subpart FF, since finalization we have learned that the threshold was based on an incorrect understanding that MSHA only samples quarterly at mines emitting 100,000 cf CH₄ or more day.

If the current regulatory threshold is retained, all mines would be required to report. This would add nearly 500 mines to the number previously expected to report, but these 500 mines would only represent another 14% of the total GHG emissions from underground coal mines. EPA is reviewing ways to address this and ensure that the threshold in the rule reflects EPA's longstanding intent to capture the gassiest mines that are responsible for the majority of emissions from underground coal mines in the United States.

Subpart HH. Municipal Solid Waste Landfills

- Q98. The landfill industry uses a portable meter that uses an IR method to determine methane and carbon dioxide concentrations. Has the EPA determined if these units are acceptable and comply with the accuracy required by the rule?
- Q100. When does moisture content need to be corrected for in Equation HH-4?
- Q102. What models are acceptable for performing the calculations in subpart HH?
- Q103. How should inert wastes be accounted for in Equation HH-1?
- Q104. The methods listed in section 98.344 are not applicable to my monitor, how should I calibrate?
- Q105. What is the definition of facility as it relates to landfills and landfill gas to electric (LFGTE) plants?
- Q106. We do not have any records or receipts for the waste quantities that were placed in our landfill before 2000, how do we estimate historic waste quantities before that year?
- Q107. If an MSW landfill has a dedicated area which receives waste other than MSW, may this area be excluded from the rule requirements?
- Q108. If an MSW landfill is later remediated as a hazardous waste landfill, does it need to comply with the rule?
- Q109. If I use a flame ionization detector (FID) or an infrared (IR) monitor, am I required to determine an annual non-methane organic correction factor?
- Q111. Do landfills have to report the biogenic CO₂ that is included in LFG emissions and the CO₂ that is emitted from flares?
- Q112. How does EPA define "at least weekly" in the monitoring requirements?
- Q113. If all of our landfill gas gets piped offsite to another facility, what do we need to report?
- Q114. Can an alternate oxidation factor, other than 10% be used in the calculations?
- Q116. Do passive flares count as "gas collection systems" under the provision below? Do the landfills with these systems have to collect data weekly?
- Q117. Does EPA's definition of treatment equipment include moisture knockout and blower systems? Is it acceptable to EPA for the flow meter to be placed after the moisture knockout and blower or is it required to be placed before these items?
- Q119. Are annubars or v-cone flowmeters acceptable for compliance with the rule requirements?
- Q120. Is weekly monitoring of both gas flow and methane concentration allowed?
- Q121. The applicability tool refers to a 350,000 waste-in-place threshold. Is reporting required if the total waste-in-place is less than

- 350,000 tons?
- Q122. Can a landfill ever stop reporting under the rule?
- Q141. My site has a gas collection system, which equations do I need to calculate to determine my methane generation and GHG emissions?
- Q150. Are scales required for Municipal Solid Waste Landfills?
- Q151. Must every container or vehicle be weighed coming in and going out of the landfill?
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- Q356. How far back in the past do we answer questions about the facility? How do we handle unknown information when the site was owned by someone prior?
- Q357. A site has 3 cells. Cells 1 and 2 have active LFG collection systems and cell 3 does not, how do we proceed?
- Q358. Did you say if we have an MSW with other parts we don't have to count those parts towards our methane generation if they were another type of landfill? (i.e., a C & D portion)? I assume I heard that wrong.
- Q359. If the landfill accepts only incinerator ash (inert) and does not generate gas, should we consider reporting the quantities of ash?
- Q360. How do you address a landfill which may have portions of lined area and others that are not lined for the same landfill?
- Q361. I am required to provide the values of Eq. HH-5 - HH-8. How are the depth waste data used?
- Q362. How do we account for highly variable designs i.e. pre and post Subtitle D, with variable depths and different cover cross-sections?
- Q389. Within e-GGRT, how would a landfill handle multiple destruction devices including a portion of the gas sent off-site for destruction? Is there a way to add multiple on-site destruction devices for a gas system?

Q98. The landfill industry uses a portable meter that uses an IR method to determine methane and carbon dioxide concentrations. Has the EPA determined if these units are acceptable and comply with the accuracy required by the rule?

Yes, a portable infrared monitor may be used to comply with the requirements of the final rule. If the infrared monitor measures total hydrocarbons, a correction factor must be established. Some infrared monitors operate in such a manner as to detect only methane; these methane-specific analyzer systems do not need to establish or use a correction factor.

Q100. When does moisture content need to be corrected for in Equation HH-4?

If CH₄ concentration and flow are both measured on a wet basis or both measured on a dry basis, then no moisture correction is needed. If one is measured on a wet basis and the other on a dry basis, then correction is needed.

Q102. What models are acceptable for performing the calculations in subpart HH?

Either the IPCC waste model or LandGem may be used for calculating modeled methane generation under subpart HH. Note that although LandGem may be used directly for bulk MSW, it is not available by waste type. LandGem may still be used, but separate runs would need to be done to model different types of waste.

Q103. How should inert wastes be accounted for in Equation HH-1?

If an MSW landfill has inert waste (glass, plastics, metal, etc) co-mingled with degradable waste streams, and the facility is using the waste-specific values in Table HH-1, then the value of zero should be assigned for the DOC and k values for this volume of waste. If the facility is using the bulk waste values for their calculations, then the inert waste quantities must be included in the quantity of waste landfilled used in the calculation. The DOC and k values for bulk waste in Table HH-1 account for some volume of inert wastes. That is, you cannot use 'material-specific' defaults only to exclude waste for the calculation.

Q104. The methods listed in section 98.344 are not applicable to my monitor, how should I calibrate?

If none of the methods listed in section 98.344(c) apply, calibrate as specified by the manufacturer.

Q105. What is the definition of facility as it relates to landfills and landfill gas to electric (LFGTE) plants?

The rule defines “facility” as any physical property, plant, building, structure, source, or stationary equipment located on one or more contiguous or adjacent properties in actual physical contact or separated solely by a public roadway or other public right-of-way and under common ownership or common control, that emits or may emit any greenhouse gas. In the case of a landfill, if one entity owns and operates the landfill and a completely separate entity owns and operates the landfill gas energy equipment, they would be two separate facilities.

Q106. We do not have any records or receipts for the waste quantities that were placed in our landfill before 2000, how do we estimate historic waste quantities before that year?

If records or receipts for waste disposal quantities are unavailable, the reporter must use one of the three estimation methods listed in section 98.343(a)(3).

Q107. If an MSW landfill has a dedicated area which receives waste other than MSW, may this area be excluded from the rule requirements?

“MSW landfill means an entire disposal facility in a contiguous geographical space where household waste is placed in or on land. An MSW landfill may also receive other types of RCRA Subtitle D wastes (40 CFR 257.2) such as commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of an MSW landfill may be separated by access roads, public roadways, or other public right-of-ways. An MSW landfill may be publicly or privately owned”. Unless this dedicated area is considered a completely separate landfill facility then this area cannot be excluded from the various requirements of the rule.

Q108. If an MSW landfill is later remediated as a hazardous waste landfill, does it need to comply with the rule?

Only RCRA Title C or TSCA hazardous waste landfills are exempt. MSW landfills that were later remediated are not exempt. Even after remediation, these landfills are still expected to have potentially significant CH₄ emissions and are therefore required to report.

Q109. If I use a flame ionization detector (FID) or an infrared (IR) monitor, am I required to determine an annual non-methane organic correction factor?

If the FID or IR monitor measures total hydrocarbons, an annual non-methane organic carbon correction factor must be established, per section 98.344(b)(6)(ii). Some infrared monitors operate in such a manner as to detect only methane; these “methane-specific” analyzer systems do not need to establish or use a correction factor.

Q111. Do landfills have to report the biogenic CO₂ that is included in LFG emissions and the CO₂ that is emitted from flares?

No. Biogenic CO₂ emissions contained in landfill gas are not reported. While the rule requires reporting, under subpart C, of biogenic CO₂ emitted from stationary combustion units, flares are excluded from Subpart C.

Q112. How does EPA define “at least weekly” in the monitoring requirements?

Under Subpart HH of the mandatory GHG reporting rule, “at least weekly” means that measurements must be taken once each calendar week with at least three days between measurements.

Q113. If all of our landfill gas gets piped offsite to another facility, what do we

need to report?

If the landfill and the other facility are separate facilities under the "facility" definition in 40 CFR 98.6 and the landfill generates 25,000 metric tons or more of CO₂ equivalent per year, then the landfill must (1) calculate and report methane generation according to both equations HH-5 and HH-7, and (2) calculate and report methane emissions according to both equations HH-6 and HH-8. If the gas is transported off-site for destruction, then the landfill should use a destruction efficiency (DE) of 1.0 in equations HH-6 and HH-8. Note that if the landfill owns and operates any stationary combustion devices at the landfill, the landfill would report emissions from these combustion devices under Subpart C. However, the landfill would not report emissions from stationary combustion devices located at a separate off-site facility that combusts gas from the landfill.

Q114. Can an alternate oxidation factor, other than 10% be used in the calculations?

No, the 10% oxidation fraction must be used in the rule equations.

Q116. Do passive flares count as "gas collection systems" under the provision below? Do the landfills with these systems have to collect data weekly?

Passive vents/flares (those that are not connected to a system of pipes used to collect landfill gas from different locations in the landfill to a single location for treatment or use) are not covered by the definition of "Gas collection system or landfill gas collection system" in Section 98.6 of the rule. Landfills that do not have gas collection systems are not required to collect gas flow and methane concentration data.

Q117. Does EPA's definition of treatment equipment include moisture knockout and blower systems? Is it acceptable to EPA for the flow meter to be placed after the moisture knockout and blower or is it required to be placed before these items?

The term treatment equipment under the rule refers to destruction devices. Knock out pots, blowers, compressors, condensate traps, etc. are not considered treatment under the rule. However, all measurements need to occur at the same relative location, i.e., all measurement should be made after the knock-out pot, blower, etc. or all before the knock-out pot, blower, etc. It is actually preferred that the measurements be made after the knock-out pot, blower, etc.

Q119. Are annubars or v-cone flowmeters acceptable for compliance with the rule requirements?

Annubar and/or v-cone flow meters (and any other type of flow meters) are allowed under the rule provided they meet the accuracy requirements for flow meters in Section 98.3(i). Calibration would be done as specified by the manufacturer if none of the methods listed in Section 98.344(c) are applicable.

Q120. Is weekly monitoring of both gas flow and methane concentration allowed?

No, gas flow must be monitored continuously. Methane concentration can be monitored weekly if continuous monitoring is not already in place.

Q121. The applicability tool refers to a 350,000 waste-in-place threshold. Is reporting required if the total waste-in-place is less than 350,000 tons?

The purpose of the applicability tool found on the EPA website is to give potential reporters guidance as to whether they meet the threshold of generating 25,000 tons CO₂ equivalent and are therefore required to report under the rule. There is no 350,000 metric ton capacity limit or waste-in-place exclusion in the rule. The 30 year waste-in-place of less than 350,000 metric tons was estimated as the quantity below which a typical landfill, using the bulk waste model, would not exceed the 25,000 ton CO₂ equivalent reporting threshold. Some facilities may have much higher methane generation. Please refer to the disclaimer for the use of the applicability tool. Facilities are encouraged to perform generation and emission calculations based on the methods specified in 40 CFR 98, Subpart HH to determine if reporting is required. According to the rule, if a landfill generated more than 25,000 metric tons of CO₂ equivalent calculated according to subpart HH, it is required to report emissions.

Q122. Can a landfill ever stop reporting under the rule?

A landfill can stop reporting under the rule if it emits less than 25,000 metric tons of CO₂ equivalent for 5 years or less than 15,000 metric tons of CO₂ equivalent for 3 years. A landfill cannot stop reporting under the rule simply because it ceases operations (i.e. no longer accepts waste) since methane will continue to generate due to the waste in place even though new waste is not being added.

Q141. My site has a gas collection system, which equations do I need to calculate to determine my methane generation and GHG emissions?

For landfills that have gas collection systems, you must calculate methane generation using both equations HH-5 and HH-7. If either equation shows that the landfill has methane generation = 25,000 metric tons CO₂e, then the landfill is required to report under the rule. If the landfill is required to report, then emissions must be calculated and reported using both equations HH-6 and HH-8.

Q150. Are scales required for Municipal Solid Waste Landfills?

If scales are in place at the MSW landfills then they must be used to determine waste quantities starting in the first monitoring year for all vehicles or containers delivering waste, except passenger vehicles and light duty pick-up trucks. If scales are not in place, the working capacity or mass of waste per type of vehicle or container must be determined. These measurements may include determining the volumetric capacity of representative containers and the average density of the waste. Wheel-load scales or portable axle-load scales may be used for these density determinations or measures of the mass of waste received by type of load. The landfill owner or operator must record the number and types of vehicles that haul waste to the landfill and use the working capacity of the containers to calculate the quantity of waste disposed. For passenger cars and light duty pick-up trucks, landfill owners and operators may use any of the above methods to determine waste quantities.

Q151. Must every container or vehicle be weighed coming in and going out of the landfill?

Two options are acceptable for using scales: 1) directly weigh each container/vehicle as it enters the landfill and each container/vehicle after the waste has been offloaded, and calculate the mass of waste disposed as the difference in the two measures; or 2) determine a tare weight for representative vehicles types, weigh the incoming containers/vehicles and calculate the mass of waste disposed based on the difference of the incoming vehicle weight and the tare weight of that vehicle type.

Q153. Does EPA accept thermal flow meters for measuring volumetric flow rate of LFGs?

Thermal mass flow meters may be used to comply with the monitoring requirements of the rule provided they meet the accuracy requirements under section 98.3(i). Calibration should be done as specified by the manufacturers if none of the methods listed in section 98.344(b) or (c) are applicable.

Q154. What additional considerations are necessary when using a mass flow meter for landfill gas?

If a mass flow meter is used, then the terms associated with volumetric flow and conversion to standard conditions (i.e., $(V/n) \times 520^\circ\text{R}/(T/n) \times (P/n) \times 1 \text{ atm}$) must be replaced by the mass flow, M , and a correction to standard volumetric flow using the average molecular weight of the gas stream, MW_{ave} , as follows: $M \times 836.6/MW_{\text{ave}}$, where 836.6 is the molar correction volume (cf/kg-mol) at 60°F and 1 atm. The average molecular weight can be determined using the GC methods, but the compositional analyses should be provided on a wet basis. If the gas composition is measured on a dry basis, the moisture content must also be measured and the dry gas compositions corrected for the moisture content. If methane composition is measured using an alternative gaseous organic concentration measurement or other infrared method (like LandTec GEM units), then GC methods or ASTM D2503-92 (Reapproved 2007) (see §98.34(b)(5)(iv)) will still need to be performed in order to determine the average molecular weight of the landfill gas during the measurement period. Note that temperature and pressure monitoring is not needed when mass flow meters are used.

Q347. What is meant by manufacturer of gas collection system?

You should include the entity that designed the gas collection system and the entity that installed the gas collection system. If this information is not known, you should report the manufacturer of the blower. A reporter should not use this space to indicate the manufacturer of the flares in place at their landfill.

Q348. What if two methods are used to estimate waste disposal quantities in a single year? How does a reporter indicate that in e-GGRT?

Within the HH module, the reporter may overlap years in reporting the methodologies used and the years in which they were used. For example, a reporter may say that they used scales to determine their waste disposal quantities from 2000 to 2009 and they used tipping receipts and other company records to estimate their waste disposal quantities from 1995 to 2003. If the years in which methods were used overlap, the reporter should use the text box in Subpart A asking the reporter for an "Explanation of any calculation methodology changes during the reporting year" to explain the different methodologies used and when they were used to estimate their waste disposal quantities.

Q349. The questions on reporting where gas is destroyed seem to consider only 2 options - either entirely on-site or entirely off-site. What if some gas is sent off-site and the rest is consumed on-site?

The e-GGRT module now contains an option of "both," meaning that some gas is sent off-site and some is consumed on-site. If the reporter chooses "both" they will still be prompted to answer the question as to whether a back-up destruction device is present at the landfill.

Q350. What if I have more than one landfill or more than one cell at my facility, one is closed, one is open, and each has different waste content?

The definition of an MSW landfill in 40CFR98.6 states that a "Municipal solid waste landfill or MSW landfill means an entire disposal facility in a contiguous geographical space where household waste is placed in or on land. An MSW landfill may also receive other types of RCRA Subtitle D wastes (40 CFR 257.2) such as commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of an MSW landfill may be separated by access roads, public roadways, or other public right-of-ways. An MSW landfill may be publicly or privately owned." Therefore, all areas in which MSW waste is disposed in a contiguous geographic space is considered as one landfill for purposes of this rule. In performing the calculations, DOC and k values should be applied to the quantity of each type of waste disposed separately and then all results should be added together for all years to determine methane generation under Equation HH-1. This is regardless of whether certain sections/cells are open or closed.

Each separate facility, as defined in 98.6, containing an MSW landfill, as defined above, must be included in a separate annual GHG report.

Q351. Have any of the equations been revised, or have any new equations been added since Subpart HH was finalized in 2009?

On October 28, 2010 EPA published a Final Rule that contained technical corrections to Subpart HH, along with several other subparts. In this Final Rule, corrections and/or adjustments were made to several of the equations including Equations HH-1, HH-2, HH-3 and HH-4. You may view the October 28, 2011 Final Rule on our web site at <http://www.epa.gov/climatechange/emissions/technical-corrections.html>.

Q352. What are definitions of wet and dry gas in subpart HH?

In reference to whether a measurement is made on a wet basis or a dry basis, the measurement is on a wet basis if it is performed directly on the gas in the collection system. Most flows are determined on a wet basis. Many extractive analyzers, however, have a condenser or sorbent to remove water vapor that may interfere with the measurement or corrode the analyzer. Measurements made where the moisture is removed prior to the measurement are considered to be made on a dry basis.

Q353. If a LFG flow meter malfunctions and is out for service for a week or two, are we required to have a backup meter or can we use the estimating missing data provisions...

Q353. If a LFG flow meter malfunctions and is out for service for a week or two, are we required to have a backup meter or can we use the estimating missing data provisions of 98.345 to estimate the gas volumes during the period that the meter was not in place?

A back-up meter is not required, the missing data provisions of 40CFR 98.345 must be used when meters malfunction or are otherwise out of service.

Q354. Do the emission formulas differ from those used in LandGEM?

LandGEM may be used for calculating modeled methane generation under subpart HH. Note that although LandGEM may be used directly for bulk MSW, it is not available by waste type. LandGEM may still be used, but separate runs would need to be done to model different types of waste.

Q355. Do we have to use the quantity of waste disposed of for every year since 1960 to calculate the modeled CH₄ generation rate?

Per Equation HH-1, to calculate the methane generation rate, you must use the quantity of waste disposed starting with 1960 or the opening year of the landfill, whichever is more recent.

Q356. How far back in the past do we answer questions about the facility? How do we handle unknown information when the site was owned by someone prior?

Waste quantities should be estimated at the opening of the landfill or 1960, whichever is more recent. The rule provides a series of three options to back-calculate disposal quantities, including using the first known annual disposal quantity for historical years for which data are not available. Default DOC values are also provided. There are no other inputs that need to be historically estimated.

Q357. A site has 3 cells. Cells 1 and 2 have active LFG collection systems and cell 3 does not, how do we proceed?

The rule contains a method to estimate the overall efficiency of the gas collection system based on the area affected by the gas collection system. See Table HH-3.

Q358. Did you say if we have an MSW with other parts we don't have to count those parts towards our methane generation if they were another type of landfill? (i.e., a C & D portion)? I assume I heard that wrong.

If you have a dedicated landfill that does not receive any household waste then that landfill, even if it is collocated at a facility with an MSW landfill, is not an affected source subject to subpart HH. See the definition of MSW landfill in the rule. While you cannot have more than one MSW landfill at a facility, based on the definition of MSW landfill, you could have an MSW and a non-MSW landfill at a given facility, and the non-MSW landfill is not subject to reporting under subpart HH.

Q359. If the landfill accepts only incinerator ash (inert) and does not generate gas, should we consider reporting the quantities of ash?

If the landfill receives only incinerator ash waste, you would not be subject to subpart HH because ash does not generate methane. If you receive some incinerator ash, which is considered inert, the DOC and k values used in Equation HH-1 would both be zero, resulting in methane generation result of zero.

E-GGRT is not collecting quantities of waste, as this is deferred. EPA has proposed to defer the reporting deadline for inputs to emission equations (75 FR 81350, available at <http://edocket.access.gpo.gov/2010/pdf/2010-32447.pdf> (PDF) (15 pp, 154K, [About PDF](#))) until March 31, 2014; e-GGRT currently reflects this proposal (i.e., does not collect inputs to emission equations) and will be updated to reflect the final rule.

Q360. How do you address a landfill which may have portions of lined area and others that are not lined for the same landfill?

Whether or not a landfill or portion of a landfill is lined is not a factor that is required to be reported or used as a part of any equation under subpart HH.

Q361. I am required to provide the values of Eq. HH-5 - HH-8. How are the depth waste data used?

The rule requires determination of both surface area and waste depth for each area specified in Table HH-3. However, the reporting of surface area has been deferred. E-GGRT still requires reporting of waste depth.

E-GGRT is not collecting quantities of waste, as this is deferred. EPA has proposed to defer the reporting deadline for inputs to emission equations (75 FR 81350, available at <http://edocket.access.gpo.gov/2010/pdf/2010-32447.pdf> (PDF) (15 pp, 154K, [About PDF](#))) until March 31, 2014. e-GGRT currently reflects this proposal (i.e., does not collect inputs to emission equations) and will be updated to reflect the final rule.

Q362. How do we account for highly variable designs i.e. pre and post Subtitle D, with variable depths and different cover cross-sections?

Provide your best estimate given the data available. You should document your determination in the GHG Monitoring Plan under 98.3(g)(5).

Q389. Within e-GGRT, how would a landfill handle multiple destruction devices including a portion of the gas sent off-site for destruction? Is there a way to add multiple on-site destruction devices for a gas system?

e-GGRT does not collect data for individual destruction devices. e-GGRT does ask if destruction occurs at the facility, off-site, or both. All reporting in e-GGRT for landfills is done at the facility level.

The following is provided to assist in performing the calculations and reporting certain elements when several destruction devices are used routinely. e-GGRT provides a means to indicate if a back-up destruction device is used; this is not what is being considered here as multiple destruction devices. Two basic scenarios are considered: 1) flow and methane content are measured at a single central location and the gas is then piped to different destruction devices (either all on-site or on-site and off-site), but the flow rate per device is not measured; 2) flow and methane content are measured separately for each on-site destruction device and, if applicable, gas sent off-site for destruction. Further information can be found via the e-GGRT Help link in the left-hand margin of e-GGRT. Go to *Using Subpart HH Calculation Spreadsheets and then to Using the Equation HH-6, HH-7, and HH-8 Calculation Spreadsheet*.

Scenario 1, Central measurement location.

Determine single value of R directly from measurement data using Equation HH-4.

Determine single value for DE using the average destruction efficiency of all destruction devices.

Determine f_{Dest} as the average annual hours for which the routinely used destruction devices were operated divided by the hours the collection system operated (presumably 8760 hour); see equation below.

Determine single value for CE using Table HH-3 considering the entire landfill facility.

Determine a single value of f_{Rec} based on the annual operating hours of the collection system.

Equations HH-5 through HH-8 can be used directly given the parameters determined above.

Other e-GGRT reporting parameters (annual volume of gas, annual average methane concentration and number of number of days/weeks missing data procedure were used) are straight forward under this scenario.

Calculate a single f_{Dest} for use in Equations HH-6 and HH-8 as follows:

$$f_{Dest} = \frac{\sum_{n=1}^{NDD} DestOpHrs_n}{NDD \times CollOpHrs}$$

Where:

f_{Dest}	=	Fraction of hours, on average, that the destruction devices associated with a single landfill gas measurement location were operating while the gas collection system was operating.
NDD	=	Number of destruction devices or locations gas is sent off-site associated with a single landfill gas measurement location.
$DestOpHrs_n$	=	The total hours the n^{th} destruction device was operating during the reporting year while the collection system was also operating or, for gas sent off-site, the total hours the gas collection system was operating (hours).
$CollOpHrs$	=	The total hours the gas collection system was operating during the reporting year (hours).

Scenario 2, Measurement at different locations.

Determine a value of R using Equation HH-4 for each destruction device (monitoring location).

Determine a value of DE for each destruction device

Determine a value of f_{Dest} for each destruction device based on the annual hours for which the specific destruction device was operating divided by the number of hours flow was sent to the destruction device (or the annual hours the collection system operated that is associated with that destruction device)

Determine single value for CE using Table HH-3 considering the entire landfill facility.

If separate gas collection systems are operated for different destruction devices, determine a value of f_{Rec} for each destruction device-specific gas collection system; otherwise, determine a single value of f_{Rec} based on the annual operating hours of the collection system.

Calculations for Equation HH-5 are not dependent on destruction devices; the equations below can be used to determine the reporting quantities for Equations HH-6 through HH-8.

Report annual volume of gas as the cumulative volume of gas collected across all measurement locations.

Report the annual average CH₄ concentration as the direct arithmetic average of the measured concentrations across all measurement locations (do not use a flow weighted average concentration).

Report the missing data times as the cumulative number of instances that missing data procedures were used across all measurement locations. [Note that currently the system only allows you to report missing concentration data on a daily or weekly basis. We will be modifying the system to allow an entry for both daily and weekly in the case that CH₄ concentration is monitored daily for certain destruction devices and weekly for others (or for gas sent off-site).]

$$\text{Emissions} = \left[\left(G_{\text{CH}_4} - \sum_{n=1}^N R_n \right) \times (1 - \text{OX}) + \sum_{n=1}^N \left\{ R_n \times (1 - (\text{DE}_n \times f_{\text{Dest},n})) \right\} \right] \quad (\text{Eq. HH-6})$$

Where:

Emissions	=	Methane emissions from the landfill in the reporting year (metric tons CH ₄).
G _{CH₄}	=	Modeled methane generation rate in reporting year from Equation HH-1 of this section or the quantity of recovered CH ₄ from Equation HH-4 of this section, whichever is greater (metric tons CH ₄).
N	=	Number of landfill gas measurement locations (associated with a destruction device or gas sent off-site).
R _n	=	Quantity of recovered CH ₄ from Equation HH-4 of this section for the n th measurement location or destruction device (metric tons).
OX	=	Oxidation fraction. Use the oxidation fraction default value of 0.1 (10%).
DE _n	=	Destruction efficiency (lesser of manufacturer's specified destruction efficiency and 0.99) for the n th destruction device. If the gas is transported off-site for destruction, use DE = 1.
f _{Dest,n}	=	Fraction of hours the n th destruction device was operating (annual operating hours/8760 hours per year). If the gas is destroyed in a back-up flare (or similar device) or if the gas is transported off-site for destruction, use f _{Dest} = 1.

Calculate CH₄ generation and CH₄ emissions using measured CH₄ recovery and estimated gas collection efficiency and Equations HH-7 and HH-8 of section 98.343(c)(3)(ii).

$$\text{MG} = \frac{1}{\text{CE}} \sum_{n=1}^N \left[\frac{R_n}{f_{\text{Rec},n}} \right] \times (1 - \text{OX}) \quad (\text{Eq. HH-7})$$

$$\text{Emissions} = \left[\left(\frac{1}{\text{CE}} \left\{ \sum_{n=1}^N \left[\frac{R_n}{f_{\text{Rec},n}} \right] \right\} - \sum_{n=1}^N R_n \right) \times (1 - \text{OX}) + \sum_{n=1}^N \left\{ R_n \times (1 - (\text{DE}_n \times f_{\text{Dest},n})) \right\} \right] \quad (\text{Eq. HH-8})$$

Where:

MG	=	Methane generation, adjusted for oxidation, from the landfill in the reporting year (metric tons CH ₄).
Emissions	=	Methane emissions from the landfill in the reporting year (metric tons CH ₄).
N	=	Number of landfill gas measurement locations (associated with a destruction device or gas sent off-site).
R _n	=	Quantity of recovered CH ₄ from Equation HH-4 of this section for the n th measurement location or destruction device (metric tons).
CE	=	Collection efficiency estimated at landfill, taking into account system coverage, operation, and cover system materials from Table HH-3 of this subpart. If area by soil cover type information is not available, use default value of 0.75 (CE4 in table HH-3 of subpart) for all areas under active influence of the collection system.
f _{Rec,n}	=	Fraction of hours the n th recovery system was operating (annual operating hours/8760 hours per year).
OX	=	Oxidation fraction. Use the oxidation fractions default value of 0.1 (10%).
DE _n	=	Destruction efficiency (lesser of manufacturer's specified destruction efficiency and 0.99) for the n th destruction device. If the gas is transported off-site for destruction, use DE = 1.
f _{Dest,n}	=	Fraction of hours the n th destruction device was operating (annual operating hours/8760 hours per year). If the gas is destroyed in a back-up flare (or similar device) or if the gas is transported off-site for destruction, use f _{Dest} = 1.

Subpart JJ. Manure Management

- Q19. How does the restriction attached to EPA's Appropriation Bill for 2010 impact Subpart JJ (Manure Management Systems) in the final Mandatory Reporting of Greenhouse Gases Rule that was published in the Federal Register on October 30, 2009?
- Q184. Can facilities with manure management systems report under the Greenhouse Gas Reporting Program?

Q19. How does the restriction attached to EPA's Appropriation Bill for 2010 impact Subpart JJ (Manure Management Systems) in the final Mandatory Reporting of Greenhouse Gases Rule that was published in the Federal Register on October 30, 2009?

EPA will not be implementing Subpart JJ of the Mandatory Reporting of Greenhouse Gases Rule due to a Congressional restriction prohibiting the expenditure of funds for this purpose.

Q184. Can facilities with manure management systems report under the Greenhouse Gas Reporting Program?

EPA is not implementing subpart JJ (Manure Management) of 40 CFR part 98 using funds provided in its FY2010 appropriations or Continuing Appropriations Act, 2011 (Public Law 111-242), due to a Congressional restriction prohibiting the expenditure of funds for this purpose. 40 CFR 98.5 requires that "[e]ach GHG report and certificate of representation for a facility or supplier must be submitted electronically in accordance with the requirements of §98.4 and in a format to be specified by the Administrator." Although the electronic Greenhouse Gas Reporting Tool (e-GGRT) is available for reporters subject to Part 98 to register their facilities and submit Certificates of Representation, consistent with the Congressional restriction, e-GGRT has not been built out with step-by-step forms to support unit and facility level reporting requirements for subpart JJ. All reporters will have the option to submit the annual GHG report in the e-GGRT Extensible Markup Language (XML) reporting schema format. Consistent with the Congressional restriction, although the XML reporting schema includes the general reporting requirements of subpart A for all facilities, it does not include subpart JJ-specific requirements. Therefore, facilities that contain the manure management source category could use the XML reporting schema to meet the general reporting requirements of subpart A, however, the XML schema will not contain subpart JJ specific reporting requirements. EPA has not developed an electronic system to report subpart JJ specific requirements.

Subpart LL. Suppliers of Coal-based Liquid Fuels

- Q183. Under subpart LL, are coal-to-liquids facilities required to report on coal-based products that are solid products (such as coke), or is reporting limited to liquid products?

Q183. Under subpart LL, are coal-to-liquids facilities required to report on coal-based products that are solid products (such as coke), or is reporting limited to liquid products?

Subpart LL applies to the supply, import and export of products that are produced at coal-to-liquids (CTL) facilities, which may include solid products. Importers or exporters of coal-based products are only subject to reporting under subpart LL if their products were produced at a CTL facility. Reporters should consult the product definitions and select the most appropriate coal-based product listed in Table MM-1 for purposes of selecting a default factor for Calculation Method 1 and reporting volumes and other information required under 98.386.

Subpart MM. Suppliers of Petroleum Products

- Q164. A third party measures the quantity of a petroleum product I receive with equipment that is not located on my site. Am I allowed to use that data to report quantity in my annual GHG report? Who is responsible...
- Q165. What is an industry standard practice, and when can one be used? How should I report an industry standard practice? Is "third party verification" or "delivery record" an industry standard practice?
- Q166. The quantity of petroleum product that I import is determined by a third party gauger who is approved by Customs & Border Protection (CBP). How should I comply with the quantity determination requirements in §98.393(a)?
- Q167. If my refinery sells a fuel product to a pipeline company that is measured by a custody transfer meter that is owned and operated solely by the customer, can I define this meter as a "fuel gas billing meter"...
- Q168. Am I required to report under subpart MM even though my refinery does not input any crude oil?
- Q169. Does the rule cover imports into and exports from all U.S. possessions, including Puerto Rico, Guam, U.S. Virgin Islands, and other U.S. territories?
- Q170. Does the rule require reporting for import shipments into a specified U.S. territory from another U.S. location, and export shipments from a specified U.S. territory to another U.S. location?
- Q171. If my refinery produces a product, feedstock or blendstock stream that is not listed in Table MM-1, how should I comply with the subpart MM reporting requirements? Am I required to use Calculation Method 2 to develop my own emission factor?
- Q172. Can a product-specific factor developed at one facility be used at another facility for the same type of product?
- Q173. What is meant by "otherwise used on site" for the subpart MM equations using feedstock quantities?
- Q174. How do I account for intermediate stocks that are traded between different refineries. For example, if I send gasoil to another location, do I account for it or do I only report finished products?
- Q175. What biomass activities are included in Equation MM-3, and in what cases should I subtract biomass out of equation MM-8?
- Q176. If a refinery imports and exports petroleum products, should these products be reported both at the facility level under §98.396(a)

as well as at the corporate level under §98.396(b) and (c)?

Q164. A third party measures the quantity of a petroleum product I receive with equipment that is not located on my site. Am I allowed to use that data to report quantity in my annual GHG report? Who is responsible...

Q164. A third party measures the quantity of a petroleum product I receive with equipment that is not located on my site. Am I allowed to use that data to report quantity in my annual GHG report? Who is responsible for retaining the associated records? Who is responsible for the accuracy of that measurement?

If a second party or a third party (such as an independent inspector) determines the quantity of a petroleum product you produce or receive, you may use that data to report quantity in your annual GHG report. If you do, you must ascertain and report the appropriate consensus-based standard or industry standard practice followed to determine quantity as specified in 98.394(a) and 98.396. If equipment is used to determine quantity, you must ensure that the calibration requirements as specified in 98.394(b) are met even if the equipment is offsite and/or operated by a third party. This applies to refineries, importers, and exporters.

You are responsible for retaining records to support quantities reported to EPA under this subpart, including but not limited to the standard method or industry standard practice used to determine quantity, the date of initial calibration of measurement equipment, the frequency of measurement equipment recalibration, other records normally maintained in the course of business to document product and feedstock flows, and anything else listed in 98.3(g) that applies. As specified in 98.3(g), records must be kept in an electronic or hard-copy format (as appropriate) and may be retained off site if they are readily available for expeditious inspection and review.

The designated representative or any alternate designated representative of the facility or supplier must sign and submit the annual GHG report and certify that the information is true, accurate, and complete. It is the facility's responsibility to ensure that all quantity measurements and standards or methods are accurately reported.

Q165. What is an industry standard practice, and when can one be used? How should I report an industry standard practice? Is "third party verification" or "delivery record" an industry standard practice?

An industry standard practice is an approach to determine quantity that achieves a precision which most members of your industry would consider reasonable for the particular product, conditions, and circumstances. You may only use an appropriate industry standard practice to determine quantity if no standard method published by a consensus-based organization exists or would be appropriate to measure the particular product under the particular conditions and circumstances. When you report the industry standard practice to EPA in your annual report, you must describe the equipment and procedures such that EPA can understand how you obtained your quantity measurements, and you must document the method in your monitoring plan.

A delivery record itself is a record and not a quantity determination method or standard practice. The appropriate method or practice followed to determine the quantity cited in a delivery record must be reported. Third party verification is also not a quantity determination method or standard practice. The appropriate method or practice followed by the third party to determine quantity must be reported.

Q166. The quantity of petroleum product that I import is determined by a third party gauger who is approved by Customs & Border Protection (CBP). How should I comply with the quantity determination requirements in §98.393(a)?

If the third party gauger uses a standard method published by a consensus-based organization to determine quantity, then you should report that method. If a CBP-approved third party gauger concludes that an appropriate consensus-based standard does not exist and uses an industry standard practice to determine quantity, then EPA will defer to the CBP-approved gauger's judgment that no existing consensus-based standard is appropriate for the situation. In such a case, you may report the industry standard practice that the inspector followed.

Q167. If my refinery sells a fuel product to a pipeline company that is measured by a custody transfer meter that is owned and operated solely by the customer, can I define this meter as a "fuel gas billing meter"...

Q167. If my refinery sells a fuel product to a pipeline company that is measured by a custody transfer meter that is owned and operated solely by the customer, can I define this meter as a "fuel gas billing meter" as in subpart A §98.3 (i) (4), which says: "Fuel billing meters are exempted from the calibration requirements of this section, provided that the fuel supplier and any unit combusting the fuel do not have any common owners and are not owned by subsidiaries or affiliates of the same company."

§98.394(b) states that "all measurement equipment" must meet the calibration requirements in subpart MM. Section §98.1(b) states that "if a conflict exists between the provision in subpart A and any other applicable subpart, the requirements of the subparts B through PP of this part shall take precedence." Therefore, the meter you use to measure quantity under subpart MM is not subject to the exemption in §98.3(i) (4) for fuel gas billing meters. Reporting parties must ensure that the calibration requirements as specified are met for quantity measurement equipment even if the equipment is offsite and/or operated by a third party. This is consistent with EPA's Response to Public Comments (Volume No. 38 for subpart MM, available at (<http://www.epa.gov/climatechange/emissions/downloads09/documents/SubpartMM-SuppliersofPetroleumProducts.pdf>) (PDF) (65 pp, 425KB, [About PDF](#)), in which EPA stated that refiners are responsible for calibration of measurement equipment operated by a third-party. Reporting parties must ensure that the calibration requirements as specified are met for quantity measurement equipment even if the equipment is offsite and/or operated by a third party.

Q168. Am I required to report under subpart MM even though my refinery does not input any crude oil?

No, a refinery that only inputs unfinished petroleum products would not meet the definition of refinery in §98.390 and would not be required to report under subpart MM. However, if you import or export petroleum products or NGLs at an amount equal to or greater than 25,000 metric tons of CO₂, you are subject to reporting as an importer or exporter under subpart MM. Note that all refineries are subject to reporting under subpart Y (regardless of what materials they input) and possibly other subparts (e.g., subpart C).

Q169. Does the rule cover imports into and exports from all U.S. possessions, including Puerto Rico, Guam, U.S. Virgin Islands, and other U.S. territories?

Yes, for the purposes of the mandatory GHG reporting rule, the "United States" consists of all U.S. possessions and territories, including Guam and the U.S. Virgin Islands. Therefore, imports to and exports from all U.S. possessions and territories are subject to reporting provided the reporter meets the applicability criteria of importer and exporter as specified in §98.2(a)(4).

Q170. Does the rule require reporting for import shipments into a specified U.S. territory from another U.S. location, and export shipments from a specified U.S. territory to another U.S. location?

No. Shipments into a U.S. territory from another U.S. location are not covered by the rule. For example, an exporter would not have to report or include in its applicability calculations any shipments of product from Texas to Guam because by definition the transfer of product would not proceed from the U.S. to another country.

Q171. If my refinery produces a product, feedstock or blendstock stream that is not listed in Table MM-1, how should I comply with the subpart MM reporting requirements? Am I required to use Calculation Method 2 to develop my own emission factor?

Reporters always have the option of using Calculation Method 1 if they so choose.

If the reporter chooses to use Calculation Method 1, they should consult the product definitions and select the most appropriate product listed in Table MM-1 for purposes of selecting a default factor for Calculation Method 1 and reporting volumes and other information required under §98.396. When evaluating your products, you should examine the definitions of the individual products listed in Table MM-1 that have corresponding default factors rather than the product category headings. So, for example, a reporter should look at the definitions for "miscellaneous products", "asphalt", and "residuum" (and any other product definitions that may be representative of the product) and decide which definition is most appropriate regardless of the end-use of the product. For a helpful summary of product definitions and emissions factors,

see the Technical Support Document, Petroleum Products and Natural Gas Liquids: Definitions, Emission Factors, Methods and Assumptions, on the EPA Web site (www.epa.gov/climatechange/emissions/downloads09/documents/SubpartMMProductDefinitions.pdf) (PDF) (33 pp, 353KB, [About PDF](#)).

If a reporter chooses to develop their own emissions factor for a product using Calculation Method 2, they must follow the procedures specified in §98.393 (f)(2) and 98.394(c).

Q172. Can a product-specific factor developed at one facility be used at another facility for the same type of product?

No, as specified in §98.393(h)(3), product-specific factors must be calculated for each reporter. Reporting for refineries occurs at the facility-level, so product-specific factors are facility-specific and must be developed for each facility.

Q173. What is meant by "otherwise used on site" for the subpart MM equations using feedstock quantities?

A product that is "otherwise used on site" includes but is not limited to a product that is combusted on site. A product that remains in the same container or vessel during the entire period from entering the facility to exiting the facility (ex refinery gate) is not considered "otherwise used on site." If, however, a product enters your facility to be blended with finished products, does not remain in the same container or vessel, and is a petroleum product or NGL, then the product must be reported as a feedstock under §98.396. Likewise, when the final, blended product exits the refinery, it must be reported under §98.396.

Q174. How do I account for intermediate stocks that are traded between different refineries. For example, if I send gasoil to another location, do I account for it or do I only report finished products?

A refinery that distills crude oil must account for each petroleum product that: 1) leaves the facility; and 2) enters the facility to be further refined or otherwise used on site. A refinery must account for each product in both of these categories regardless of the frequency that it leaves or enters the refinery and regardless of whether it is finished or unfinished. Reporters should select the most appropriate product listed in Table MM-1 for purposes of selecting a default factor for Calculation Method 1 and for reporting volumes and other information required under §98.396.

Q175. What biomass activities are included in Equation MM-3, and in what cases should I subtract biomass out of equation MM-8?

One example of a biomass activity included in Equation MM-3 is bringing animal fat on site to be co-processed with distillates to produce renewable diesel. Equation MM-8 only applies to blended fuels, so if you co-process biomass to produce renewable diesel, you should not use Equation MM-8.

Q176. If a refinery imports and exports petroleum products, should these products be reported both at the facility level under §98.396(a) as well as at the corporate level under §98.396(b) and (c)?

Yes. The applicability criteria and reporting requirements for refiners, importers, and exporters are independent of each other. Refineries must report all products at the facility level while importers and exporters report products at the corporate level.

Subpart NN. Suppliers of Natural Gas and Natural Gas Liquids

- Q286. If a natural gas supplier has companies it owns in different states, can the supplier report all of the companies together or should they be separated by state or company name?
- Q289. The rule states that LDCs need to report under subpart NN if they delivered more than 460,000 Mscf in 2010. How should an LDC determine if it "delivered" more than 460,000 Mscf in 2010? Does this include quantities...

Q286. If a natural gas supplier has companies it owns in different states, can the supplier report all of the companies together or should they be separated by state or company name?

According to the definition of an LDC in 98.400(b), the owner/operator of each LDC that is regulated as a separate operating company by State public utility commissions or that operate as independent municipally-owned distribution systems must submit an annual report. If your LDC operates in multiple states, and you are subject to the regulations of each state for the pipelines that are within that state's borders, then the operations in each state are considered a separate LDC per the above definition. The owner/operator of each LDC as defined above must submit a separate report.

Q289. The rule states that LDCs need to report under subpart NN if they delivered more than 460,000 Mscf in 2010. How should an LDC determine if it "delivered" more than 460,000 Mscf in 2010? Does this include quantities...

Q289. The rule states that LDCs need to report under subpart NN if they delivered more than 460,000 Mscf in 2010. How should an LDC determine if it "delivered" more than 460,000 Mscf in 2010? Does this include quantities delivered to other LDCs and/or large end-users? What about natural gas placed into/removed from storage?

According to Table A-5 of Part 98 (Subpart A), local natural gas distribution companies that deliver 460,000 thousand standard cubic feet (Mscf) or more of natural gas per year are subject to the rule. This threshold does not include deliveries to other LDCs or downstream gas transmission pipelines as they are not deemed "end-users". This threshold does cover deliveries to all end users, including those end-users that receive greater than 460,000 Mscf per year.

There are two potential ways that an LDC could calculate whether they surpass the threshold. One option is to add the appropriate delivered volumes of natural gas in 98.406. To determine natural gas "delivered" from the data elements in 98.406 you would take the annual volume in Mscf received by the LDC, subtract the volume placed into storage, add vaporized LNG produced at on-system vaporization facilities for delivery, if not accounted for in (b)(1), add volume of gas withdrawn from on-system storage (that is not delivered to the city gate) for delivery on the distribution system, add gas delivered directly to LDCs from producers or gas processing plants, and subtract gas re-delivered to downstream gas transmission pipelines and other local distribution companies. In summary, total gas delivered would be (b)(1) - (b)(2) + (b)(3) + (b)(4) + (b)(5) - (b)(6).

Alternatively, you could add the emissions calculated using Equation NN-6 and the emissions calculated using Equation NN-4. Please note, however, that the threshold for subpart NN is in terms of Mscf, so you would need to convert the GHG emissions estimate in metric tons back to Mscf to determine applicability.

Subpart OO. Suppliers of Industrial Greenhouse Gases

- Q178. Are importers of HFCs required to obtain EPA approval before importing the HFCs into the U.S.?
- Q287. How does one handle the calculation of blends such as R-410A? Do we calculate on the basis of the components, e.g., HFC-125 and HFC-32?
- Q292. On March 18, 2011, EPA extended the deadline for reporting 2010 GHG data from March 31, 2011 to September 30, 2011. Does this extension also apply to the one-time reports that are due on March 31, 2011, and that are required under subpart OO...
- Q363. Does the information from the Reporting Forms populate e-GRRT fields or are they just uploaded files? If automatically populated, are these values available for review before submitting the report?
- Q364. How do I calculate addition to the "net supply"?
- Q365. Why do net additions of GHGs have to be added manually when they already exist in the uploaded forms?
- Q366. Can we upload multiple copies of the same file if we have more than 10 processes? How will eGRRT know that the second copy is a report for processes 11-20 and...
- Q390. How do I report imports and exports of refrigerant blends that contain both HCFCs and HFCs?

Q178. Are importers of HFCs required to obtain EPA approval before importing the HFCs into the U.S.?

Importers of hydrofluorocarbons (HFCs) are not required to obtain approval from EPA before importing the HFCs. However, under EPA's Greenhouse Gas Reporting Rule (40 CFR Part 98), importers are required to annually report their bulk imports and exports of HFCs and other greenhouse gases if their total combined bulk imports of fluorinated greenhouse gases (fluorinated GHGs), nitrous oxide (N₂O), and carbon dioxide (CO₂) exceed 25,000 metric tons of carbon dioxide equivalents (CO₂e) per year. (They are also required to report if their total annual exports of these gases exceed 25,000 metric tons of carbon dioxide equivalents (CO₂e) per year.) Fluorinated GHGs include HFCs, perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), nitrogen trifluoride (NF₃), hydrofluoroethers (HFEs), and others. For purposes of the Greenhouse Gas Reporting Rule, fluorinated GHGs exclude chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs), which are regulated under EPA's stratospheric ozone protection regulations (40 CFR Part 82).

Q287. How does one handle the calculation of blends such as R-410A? Do we calculate on the basis of the components, e.g., HFC-125 and HFC-32?

Yes, you calculate the CO₂ equivalent of an HFC blend by breaking out the mass of the blend into the masses of its component HFCs, converting the mass of each of those HFCs into CO₂ equivalents, and then adding together the CO₂ equivalents of all components.

For example, if you imported 20 metric tons of R-410A (composed of 50% HFC-125 and 50% HFC-32 by weight), you would break out the 20 metric tons into 10 metric tons of HFC-125 and 10 metric tons of HFC-32. You would then convert each of those masses into CO₂ equivalents: 28,000 mtCO₂e for the 10 tons of HFC-125 and 6,500 mtCO₂e for the 10 tons of HFC-32. You would then add these together to get the CO₂ equivalents of the blend: 34,500 mtCO₂e in this example.

Q292. On March 18, 2011, EPA extended the deadline for reporting 2010 GHG data from March 31, 2011 to September 30, 2011. Does this extension also apply to the one-time reports that are due on March 31, 2011, and that are required under subpart OO...

Q292. On March 18, 2011, EPA extended the deadline for reporting 2010 GHG data from March 31, 2011 to September 30, 2011. Does this extension also apply to the one-time reports that are due on March 31, 2011, and that are required under subpart OO at §98.416(b), (e), and (f)? If not, then how and where should these reports be submitted?

The March 18, 2011 deadline extension applies only to the annual GHG reports required under §98.3(b) (or the abbreviated report under §98.3(d)(3)). EPA has not extended the deadlines for other reports described in other subparts, such as the one-time reports required under subpart OO at §98.416(b), (e), and (f). The deadline for submitting these reports to EPA remains March 31, 2011 (or another deadline specified in subpart OO, e.g., within 60 days of commencing fluorinated GHG destruction).

EPA has prepared optional spreadsheets that facilities and suppliers may use to submit their one-time reports under subpart OO. Reporters may obtain a copy of the spreadsheets here: <http://epa.gov/climatechange/emissions/subpart/oo.html>

Facilities and suppliers must submit these one-time reports on a CD (preferred) or in hard copy to the address specified in §98.9 for all requests, notifications, and communications with the Administrator (other than the annual GHG report):

- (a) For U.S. mail: Director, Climate Change Division, 1200 Pennsylvania Ave, NW, Mail Code: 6207J, Washington, DC 20460
- (b) For package deliveries: Director, Climate Change Division, 1310 L St., NW., Washington, DC 20005

To permit us to quickly identify the one-time reports, facilities and suppliers are encouraged to write "ATTN: Subpart OO One-Time Report" on the bottom left side of the envelope.

Q363. Does the information from the Reporting Forms populate e-GRRT fields or are they just uploaded files? If automatically populated, are these values available for review before submitting the report?

The spreadsheet data will not populate e-GRRT fields. The spreadsheets will simply accompany the GHG report that is submitted. You can review the spreadsheets themselves to verify that you have correctly entered the data into them.

Once you have uploaded the spreadsheets, you will be required to enter some summary data into e-GRRT online. For subpart OO, this summary data consists of the supplier's net addition to the supply of each industrial GHG. The net addition is calculated for you on the "summary" tab of the workbook; you may wish to have a copy of this "summary" spreadsheet convenient for the e-GRRT data entry step. Once you enter the data on the net addition to the supply, that data will be added to your roll-up calculation, which you can review before submitting.

For production facilities, the net addition to the supply is calculated by subtracting the quantities of each industrial GHG transformed or destroyed from the quantity of that GHG produced. Note that if a facility produces and transforms or creates and destroys an industrial GHG without ever sending that industrial GHG off-site, it does not need to report its production, transformation, or destruction of that industrial GHG under subpart OO. However, if the facility produces an industrial GHG and also accepts that industrial GHG from outside the facility for transformation or destruction, it does need to report the quantities produced, transformed, and destroyed under subpart OO, and it does need to calculate its net addition to the supply of that GHG for input into e-GRRT.

For importers and exporters, the net addition to the supply is calculated by subtracting the quantities of each industrial GHG exported (and, in some cases, destroyed) from the quantity of that GHG imported.

Note that your net addition to the supply of a particular industrial GHG may be negative, e.g., if you export that industrial GHG but do not import it.

Q364. How do I calculate addition to the "net supply"?

For production facilities, the net addition to the supply is calculated by subtracting the quantities of each industrial GHG transformed or destroyed from the quantity of that GHG produced. Note that if a facility produces and transforms or creates and destroys an industrial GHG without ever sending that industrial GHG off-site, it does not need to report its production, transformation, or destruction of that industrial GHG under subpart OO. However, if the facility produces an industrial GHG and also accepts that industrial GHG from outside the facility for transformation or destruction, it does need to report the quantities produced, transformed, and destroyed under subpart OO, and it does need to calculate its net addition to the supply of that GHG for input into e-GGRT.

For importers and exporters, the net addition to the supply is calculated by subtracting the quantities of each industrial GHG exported (and, in some cases, destroyed) from the quantity of that GHG imported.

Note that your net addition to the supply of a particular industrial GHG may be negative, e.g., if you export that industrial GHG but do not import it.

Q365. Why do net additions of GHGs have to be added manually when they already exist in the uploaded forms?

The e-GGRT system does not have the ability to extract data from the spreadsheets. To ensure that each reporter's net additions to the supply are included in the net additions to the supply at the national level, we are requiring reporters to report their net additions to the supply through e-GGRT online. The subpart OO Reporting Forms workbook includes a summary sheet that calculates your net additions to the supply for you.

Q366. Can we upload multiple copies of the same file if we have more than 10 processes? How will eGGRT know that the second copy is a report for processes 11-20 and...

Q366. Can we upload multiple copies of the same file if we have more than 10 processes? How will eGGRT know that the second copy is a report for processes 11-20 and not just an overwrite of the report filed for processes 1-10? For more than 10 production processes and multiple forms, can we just fill out Part 2 of the additional forms (process information, not facility information)?

If you have more than 10 production or transformation processes or more than 5 import or export shipments, you must download, fill out, and upload multiple copies of the Reporting Form. We recommend adding "Processes 1 to 10" and "Processes 11 to 20," (as appropriate) to the name of each copy of the form to clarify that the second uploaded form is NOT intended to replace the first, but to supplement it. To ensure that we associate each process with the correct facility, we recommend filling out Part 1 (facility information) as well as the appropriate subsequent Parts of each copy of the form. You can copy and paste the Part 1 information from the first copy of the form, as long as you copy and paste only the blue cells. (The gray cells are write-protected and will therefore cause the "paste" function to fail if they are included in the copied cells.)

Q390. How do I report imports and exports of refrigerant blends that contain both HCFCs and HFCs?

If you import or export a blend that contains HFCs as well as HCFCs, you may be required to report the import or export under EPA's Greenhouse Gas Reporting Rule (40 CFR Part 98) as well as under EPA's Stratospheric Protection Regulations (40 CFR Part 82). Specifically, you are required to report the HFC portion of the import or export under the Greenhouse Gas Reporting Rule if your total annual imports or exports exceed the threshold discussed below. You are required to report the HCFC portion of the import or export under the Stratospheric Protection Regulations regardless of your total annual imports or exports.

For HFCs: Under the Greenhouse Gas Reporting Rule, importers and exporters are required to annually report their bulk imports and exports of HFCs and other greenhouse gases if their total combined bulk imports of fluorinated greenhouse gases (fluorinated GHGs), nitrous oxide (N₂O), and carbon dioxide (CO₂) exceed 25,000 metric tons of carbon dioxide equivalents (mtCO₂e) per year. They are also required to report if their total annual bulk exports of these gases exceed 25,000 metric tons of carbon dioxide equivalents (mtCO₂e) per year. Only GHGs listed in Table A-1 count towards the 25,000 mtCO₂e threshold. For blends of HFCs and HCFCs, HFCs and other GHGs listed in Table A-1 count toward the threshold, but HCFCs do not. You can visit the following website for a tool to help you calculate the CO₂-equivalents of your imports and exports of HFCs and common refrigerant blends: <http://www.epa.gov/climatechange/emissions/subpart/oo.html> (Click the link under "Implementation Information")

For HCFCs: Under the Stratospheric Protection Regulations, importers and exporters of HCFCs must report detailed information on all HCFC imports and exports on an annual or quarterly basis. This reporting requirement applies both to pure HCFCs and to HCFCs contained in blends, regardless of the total annual imports or exports of the importer or exporter. HCFC importers are also required to comply with the other applicable provisions of EPA's Stratospheric Protection Regulations. Special petitioning provisions apply to imports of used HCFCs.

You can find more information on EPA's stratospheric ozone protection recordkeeping and reporting regulations (which cover CFCs and HCFCs) at <http://www.epa.gov/ozone/record/index.html>.

Subpart PP. Suppliers of Carbon Dioxide

- Q279. To measure the composition of the CO₂ stream, am I limited to the two methods listed in 40 CFR part 98.424(b)(2)?

Q279. To measure the composition of the CO₂ stream, am I limited to the two methods listed in 40 CFR part 98.424(b)(2)?

You may use any method to measure the composition of the CO₂ stream that makes sense for the conditions at your facility, as long as it conforms to applicable chemical analytic standards. You are not limited to the two methods listed in the rule. Please note that you must report to EPA whichever method you choose to use, per the reporting requirement at 40 CFR part 98(a)(4).