ECMPS Reporting Guidance for the GHG-MRR

§98.33(a)(5) of the Mandatory Greenhouse Gas Reporting Rule (MRR) allows units that are not subject to the Acid Rain Program (ARP) or the Regional Greenhouse Gas Initiative (RGGI) that use the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool to report heat input data (but not CO_2 mass emissions data) to EPA on a year-round basis in accordance with 40 CFR Part 75, to determine their annual CO_2 mass emissions for Part 98 purposes using an appropriate methodology in Appendix F or Appendix G of Part 75, as an alternative to using the four-tiered CO_2 emissions calculation approach described in §§98.33(a)(1) through (a)(4). Units that are not required to report to EPA using ECMPS under another program may not use the alternative methodology described in §98.33(a)(5), but must instead use one of the tiered options given in §98.33(a)(1) through (4).

EPA will not be creating any new program code(s) in the ECMPS system for the MRR. Rather, the ECMPS Client Tool will be modified to allow units that elect to use the monitoring and reporting option under §98.33(a)(5) to add CO_2 methodology records, CO_2 mass emissions formulas, etc. to their monitoring plans which will support the reporting of quality assurance test and emissions data. The Client Tool modifications will be made and an updated version of the Tool will be released, prior to April 1, 2010 (which is the start of the 1st quarter reporting period), in order to accommodate CO_2 mass emissions data from these units for the entire year of 2010.

For Acid Rain Program units and units already reporting CO_2 mass emissions data year-round through ECMPS for the RGGI program, no changes are needed to either the electronic monitoring plans or the quarterly electronic data reports. However, other Part 75 sources that choose to use the alternative method from §98.33(a)(5) to determine their annual CO_2 and heat input, must do the following:

1. If the unit currently reports on an ozone season basis, the reporting frequency must be changed to a year-round or "annual" basis. Because CAMD does not know which of the ozone season-only reporters will choose to use the alternative method in §98.33(a)(5) which requires switching to year-round reporting of heat input through ECMPS, you must contact Craig Hillock by email (hillock.craig@epa.gov) and request that the reporting frequency be changed from "ozone season-only" to "annual" in the CAMD Business System.

2. Beginning on January 1, 2010, all emissions data (NO_x , SO_2 (if applicable), etc.) and heat input data for all units using the monitoring and reporting option in §98.33(a)(5) must be reported on the year-round or "annual" basis. If you elect not to report CO_2 mass emissions data through ECMPS no further changes to your ECMPS reporting is required[1]. However, if you do choose to report the CO_2 mass emissions data through ECMPS then you must also:

    a. Update the monitoring plan by first adding a <MonitoringMethodData> record for either "CO2" or "CO2M" (as appropriate)[2]. See Section 6.0, "Monitoring Method Data" in the ECMPS Monitoring Plan Reporting Instructions, for the appropriate codes for each field of the record. Next, add the appropriate monitoring systems, components, emission formula records, applicable monitoring defaults, and span records to support the Part 75 CO_2 mass emissions methodology that will be used.

[1] The alternative method from §98.33(a)(5) requires the Part 75 monitoring and reporting of heat input, however the Part 75 reporting of the CO2 mass data through ECMPS is optional.

[2] Report the "CO2" monitoring method code if you use CEMS or Equation G-4 in Appendix G of Part 75 to quantify CO_2 mass emissions. Report the "CO2M" monitoring method code if you use the low mass emissions (LME) methodology in §75.19 to quantify CO_2 mass emissions.

(Note: You must upgrade to the 1Q 2010 version of the ECMPS Client Tool before attempting to add CO2 mass data records to the monitoring plan. Previous versions of the Client Tool will generate Critical Error messages for an "unexpected CO_2 methodology").

b. Conduct and report the results of the initial certification tests for any new monitoring systems that must be added to determine CO_2 mass emissions. Existing monitoring systems that are already certified (e.g., fuel flow meters, CO_2 concentration systems used for heat input monitoring, stack gas flow rate monitors, etc.) need not be recertified. Also report the results of any quality-assurance tests for the existing monitoring systems that may affect data validation in 2010 (e.g., 4^{th} quarter 2009 linearity checks).