

Suppliers of Coal-based Liquid Fuels



Final Rule: Mandatory Reporting of Greenhouse Gases

Under the Mandatory Reporting of Greenhouse Gases (GHGs) rule, all producers, importers, and exporters of coal-based liquid fuels that meet the applicability requirements of the rule (see information sheet on General Provisions) must report GHG emissions that would result from the complete combustion or oxidation of the coal-based liquids that they supply into commerce. Facility owners or operators of coal-based liquid fuels (coal-to-liquid products), importers of coal-to-liquid products, and exporters of coal-to-liquid products are required to collect data on their products; calculate the GHG emissions associated with these products; and follow the specified procedures for ensuring data quality, amending missing data, and meeting recordkeeping and reporting requirements.

How Is This Source Category Defined?

This source category consists of producers, importers, and exporters of coal-based liquid fuels listed on Table MM-1 of the rule. A producer of coal-to-liquid products is any owner or operator who converts coal into liquid products (e.g., gasoline, diesel) using the Fischer-Tropsch or an alternative process. Importers and exporters are defined as:

1. Importers who bring coal-based petroleum products or natural gas liquids (NGLs) into the United States from a foreign country must report if the quantity of coal-based petroleum products imported is equivalent to 25,000 metric tons CO₂e or more.
2. Exporters who transfer coal-based petroleum products or NGLs from the United States to another country or to an affiliate in another country must report if the quantity of coal-based petroleum products exported is equivalent to 25,000 metric tons CO₂e or more.

What GHGs Must Be Reported?

Suppliers of coal-to-liquid products must report the following on an annual basis:

- Carbon dioxide (CO₂) emissions that would result from the complete combustion or oxidation of each coal-to-liquid product produced, used as feedstock, imported, or exported during the calendar year.
- CO₂ emissions that would result from the complete combustion or oxidation of any biomass co-processed with fossil fuel-based feedstock to produce a product (required only for producers).

Suppliers of coal-to-liquid products are not required to report data on emissions of other GHGs, such as methane, that would result from the complete combustion or oxidation of their products.

How Must GHG Emissions Be Calculated?

Suppliers must calculate the annual CO₂ emissions (metric tons) that would result from the complete combustion or oxidation of all coal-to-liquid products leaving the facility, minus emissions that would result from the complete combustion or oxidation of: 1) coal-to-liquid products entering the facility to be further processed or otherwise used on site and 2) any biomass co-processed with fossil fuel-based feedstock. To calculate these emissions, multiply the measured annual quantity of each coal-to-liquid product (metric tons or barrels) by a product-specific CO₂ emission factor (metric tons CO₂ emitted per barrel or per metric ton of product). Use one of two alternative methods to determine the emission factor

for each coal-to-liquid product, including products that enter the facility to be further processed or otherwise used on site:

- Method 1: Use a CO₂ emission factor (metric tons CO₂ emitted per barrel) that is provided in the rule for each coal-to-liquid product.
- Method 2: Develop an emission factor using direct measurement of density and carbon share (i.e., percent carbon by mass).

For calculating biomass feedstock, use the biomass default factors provided per Method 1. For coal-to-liquid products produced by blending a fossil fuel-based feedstock with a biomass-based fuel, the rule provides special procedures for calculating emissions to account for the volume percentage of fossil fuel-based product.

When Must Reports be Submitted?

The submission date for the annual GHG report can vary in the first 3 years of the program.

- Reporting Year 2010. The report was required to be submitted by September 30, 2011.
- Reporting Year 2011. The due date depends on which source categories are included in the report. If the report includes one or more of the source categories listed below, then the report must be submitted by September 28, 2012. This reporting deadline applies to all subparts being reported by the facility. In addition, if the facility contains one or more of these source categories and the facility submitted a GHG annual report for reporting year 2010 under another subpart (e.g., subpart C for general stationary fuel combustion), then by April 2, 2012 you must notify EPA through e-GGRT that you are not required to submit the second annual report until September 28, 2012 (the notification deadline according to 4 CFR 98.3(b) is March 31, 2012, however, because this date falls on a Saturday in 2012, the notification is due on the next business day).
 - Electronics Manufacturing (subpart I)
 - Fluorinated Gas Production (subpart L)
 - Magnesium Production (subpart T)
 - Petroleum and Natural Gas Systems (subpart W)
 - Use of Electric Transmission and Distribution Equipment (subpart DD)
 - Underground Coal Mines (subpart FF)
 - Industrial Wastewater Treatment (subpart II)
 - Geologic Sequestration of Carbon Dioxide (subpart RR)
 - Manufacture of Electric Transmission and Distribution (subpart SS)
 - Industrial Waste Landfills (subpart TT)
 - Injection of Carbon Dioxide (subpart UU)
 - Imports and Exports of Equipment Pre-charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed-cell Foams (subpart QQ)

If the report contains none of the source categories listed above, then the report must be submitted by April 2, 2012 (the deadline is March 31, 2012, however, because this date falls on a Saturday, the annual report is due on the next business day).

- Reporting Year 2012. Starting in 2013 and each year thereafter, the report must be submitted by March 31 of each year, unless the 31st is a Saturday, Sunday, or federal holiday, in which case the reports are due on the next business day.

What Information Must Be Reported?

In addition to the information required by the General Provisions at 40 CFR 98.3(c), producers of coal-to-liquid products must report the following information for each of their facilities:

- Annual CO₂ emissions (metric tons) that would result from the complete combustion or oxidation of all coal-to-liquid products leaving the facility, minus emissions that would result from the complete combustion or oxidation of: 1) coal-to-liquid products entering the facility to be further processed or otherwise used on site and 2) any biomass co-processed with fossil fuel-based feedstock.
- Annual CO₂ emissions (metric tons) that would result from complete combustion or oxidation for:
 - Each coal-to-liquid product leaving the facility.
 - Each coal-to-liquid product that enters the facility to be further processed or otherwise used on site.
 - Each type of biomass that enters the facility to be co-processed with fossil fuel-based feedstock to produce a product.
- Annual quantities (metric tons or barrels) of:
 - Each coal-to-liquid product leaving the facility.
 - Each coal-to-liquid product entering the facility to be further processed or otherwise used on site.
 - Each type of biomass entering the facility to be co-processed with fossil fuel-based feedstock to produce a product.
 - Percent of the volume reported that is fossil fuel-based, for each product and feedstock produced by blending a fossil fuel-based product with a biomass-based product.
- Annual quantities (metric tons or barrels) aggregated by each measurement method used to determine quantity of:
 - Each coal-to-liquid product leaving the facility.
 - Each coal-to-liquid product entering the facility to be further processed or otherwise used on site.
 - Each type of biomass entering the facility to be co-processed with fossil fuel-based feedstock to produce a product.
 - Percent of the volume reported that is fossil fuel-based, for each product and feedstock produced by blending a fossil fuel-based product with a biomass-based product.
- The total quantity of bulk natural gas liquids in metric tons or barrels received for processing during the reporting year.
- Report the following for each product and feedstock for which an emission factor was developed:
 - Number of samples collected.
 - Sampling standard method used.
 - Carbon share test results in percent mass.
 - Standard method used to test carbon share.
 - Calculated CO₂ emission factor in metric tons CO₂ per barrel.
 - Density test results in metric tons per barrel (non-solid products and feedstock).
 - Standard method used to test density (non-solid products and feedstock).

In addition to the information required by the General Provisions at 40 CFR 98.3(c), report at the corporate level all the following information for imports and exports:

- Annual CO₂ emissions (metric tons) that would result from the complete combustion or oxidation of all coal-to-liquid products.
- Annual CO₂ emissions (metric tons) that would result from the complete combustion or oxidation of each coal-to-liquid product.

- Annual quantities (metric tons or barrels) of each coal-to-liquid product.
- Annual quantities (metric tons or barrels) of each coal-to-liquid product, aggregated by each measurement method used to determine quantity.
- Percent of the volume reported that is fossil fuel-based, for each product produced by blending a fossil fuel-based product with a biomass-based product.
- Report the following for each product for which an emission factor was developed:
 - Number of samples collected.
 - Sampling standard method used.
 - Carbon share test results in percent mass.
 - Standard method used to test carbon share.
 - Calculated CO₂ emissions factor in metric tons CO₂ per barrel.
 - Density test results in metric tons per barrel (non-solid products).
 - Standard method used to test density (non-solid products).

A checklist for data that must be monitored is available at:

www.epa.gov/climatechange/emissions/downloads/checklists/supplierscoalbasedliquid.pdf.

For More Information

This document is provided solely for informational purposes. It does not provide legal advice, 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. The series of information sheets is intended to assist reporting facilities/owners in understanding key provisions of the final rule.

Visit EPA's Web site (www.epa.gov/climatechange/emissions/ghgrulemaking.html) for more information, including the final preamble and rule, additional information sheets on specific industries, the schedule for training sessions, and other documents and tools. For questions that cannot be answered through the Web site, please contact us at: GHGreporting@epa.gov.