

Subpart LL and Subpart MM Transition to Reporting using e-GGRT



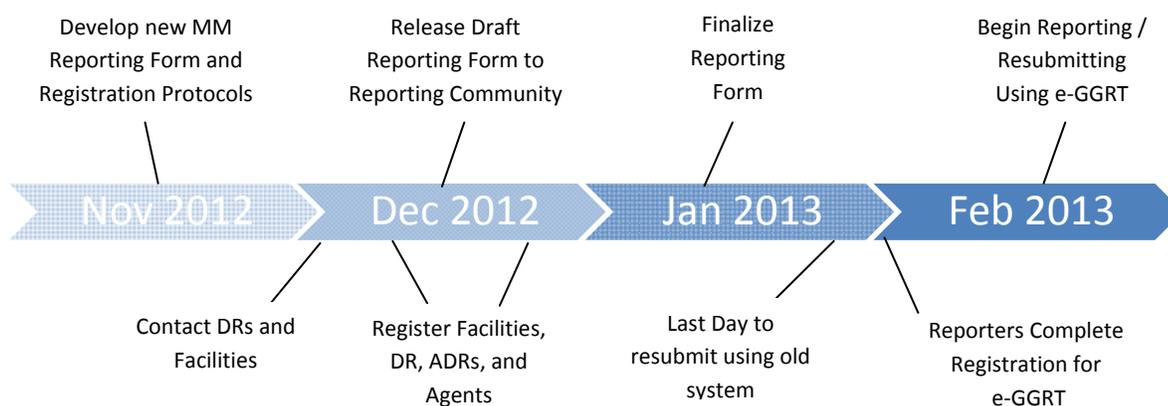
Suppliers of Petroleum Products (subpart MM) *Suppliers of Coal-Based Liquids (subpart LL)*

Suppliers of Petroleum Products and Suppliers of Coal-based Liquids must report the Greenhouse Gas (GHG) emissions that would result from the complete combustion or oxidation of the products they supply under EPA's Greenhouse Gas Reporting Program (GHGRP). These reporting requirements apply to all producers of these products as well as companies that import and export these products that meet the applicability requirements.

For reporting years (RY) 2010 and 2011, GHG reports for these subparts were submitted in conjunction with EPA's Office of Transportation and Air Quality (OTAQ) in the DCFUEL application. After January 25, 2013 subpart LL and MM reporting (both RY2012 submissions as well as revisions to RY2010 or RY2011) will be submitted using the electronic Greenhouse Gas Reporting Tool (e-GGRT). There will be a period of several weeks during which neither the DCFUEL application nor e-GGRT will be available to accept subpart MM and subpart LL submissions in late-January through mid-February. EPA strongly encourages reporters with outstanding verification-related issues to resubmit their reports using the old system prior to January 25, 2013. EPA plans for e-GGRT to be ready to accept resubmittals and RY2012 reports in mid-February.

Transition Timeline

To assist reporters in their transition to e-GGRT reporting, EPA will send e-mail notifications to RY2010 and RY2011 reporters to provide instructions and guidance appropriate to their specific facilities in December. EPA's transition schedule is presented below. EPA will provide draft reporting forms for industry feedback in mid-to-late December. EPA will accept comments from stakeholders on the reporting forms in January and continue to improve the forms based on this feedback until the forms are finalized in mid-February.



As part of this transition, EPA will be developing and testing a new subpart MM reporting form (in MS Excel) and will accept suggestions regarding that form from the reporting community. While the forms themselves will look a little different than the current forms, the data elements to be reported under subpart LL and subpart MM remain the same. The new forms will appear similar to reporting forms used by other industries which already report using e-GGRT. The new forms will allow for electronic submittal and built-in data checks to give reporters immediate feedback on data quality during the data entry and submittal process. This instantaneous feedback at the time of submissions will reduce the amount of interaction needed between EPA and the reporter after the data is submitted to EPA. The transition to e-GGRT will also make it easier for EPA to communicate with subpart LL and MM reporters to provide reminders on upcoming deadlines and messages regarding data quality.

e-GGRT Registration Process

Many facilities reporting under subpart MM and subpart LL are already registered in e-GGRT to report greenhouse gas data under other subparts of the rule. These reporters will also have the option to consolidate their GHG reporting under a single facility or continue to report their subpart MM data as part of an independent facility. For those subpart MM and subpart LL reporters that do not currently exist in e-GGRT, EPA will take steps to streamline the registration process as much as possible.

- The designated representative (DR) for each facility with an active account with the Central Data Exchange (CDX) will be contacted by the GHGRP Help Desk to establish a user name and password within the e-GGRT system.
- Secondly, for each facility properly registered to report GHG data in OTAQReg, EPA will pre-populate facility information in e-GGRT, meaning DRs will simply need to claim their facilities in e-GGRT.
- Finally, EPA will coordinate with DRs to establish access rights for his or her Alternate DR and Agents. Any DRs without CDX accounts and any facilities not properly registered through OTAQReg will need to complete the standard e-GGRT registration process.

EPA is in the process of developing webinar slides to walk Subpart MM reporters through the e-GGRT registration process. When complete, the webinar slides will be posted here:

<http://www.epa.gov/ghgreporting/reporters/training/index.html>

Reporting Year 2012 Deadline

All RY2012 greenhouse gas reports will be due to the e-GGRT system by April 1, 2013. The actual date when e-GGRT will open will be posted on the GHGRP's website.

For More Information

For a more detailed discussion of the facility registration process and for answers to common questions about the transition please refer to our subpart MM and LL FAQ pages:

(MM): <http://www.ccdsupport.com/confluence/display/faq/Subpart+MM.+Suppliers+of+Petroleum+Products>

(LL): <http://www.ccdsupport.com/confluence/display/faq/Subpart+LL.+Suppliers+of+Coal-based+Liquid+Fuels>

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/ghgreporting/reporters/index.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.