Greenhouse Gas Reporting Program

BEST AVAILABLE MONITORING METHODS (BAMM)

During the first year that the GHGRP applied, facilities had the option for most source categories to use a best available monitoring method (BAMM) to determine emissions from specific emissions sources for a limited amount of time. The use of BAMM was allowed because it was not always feasible for a newly subjected facility to acquire, install, and operate all of the required monitoring equipment by the date required by the GHGRP. EPA's BAMM provision provided time for these facilities to replace their equipment in a way that could minimize impacts to normal business operations. Over time, facilities are expected to operate all monitoring equipment required by the GHGRP and determine emissions using the methods specified by the GHGRP. This fact sheet answers common questions about BAMM and displays the time periods for which BAMM was available to facilities in each reporting sector (Table 1). The number of facilities that used BAMM in each reporting year, if any, is available in the sector reports.

What is BAMM?

A BAMM is a method used by GHGRP reporters for monitoring emissions or process operating parameters that is devised by a reporter as an alternative to using a monitoring method specified by the GHGRP. BAMM can include any of the following methods:

- Monitoring methods currently used by a facility that do not meet the specifications of the GHGRP.
- Data available through third parties such as the quantity of fuel received.
- Engineering calculations.
- Other company records.

Is the use of BAMM still allowed?

Most facilities were automatically allowed to use BAMM for periods ranging from 3 months to 12 months from the date of initial applicability. For most source categories, BAMM expired on December 31, 2011 for facilities that began reporting in 2010 or 2011. Facilities are now required to obtain EPA approval if they need to use BAMM for longer periods. See Table 1.

Under what circumstances are facilities granted the extended use of BAMM?

To obtain EPA approval to use BAMM beyond the automatic BAMM period, a facility must submit a timely BAMM application with the following information:

- The specific monitoring requirements for which the request applies.
- Description and documentation of the reasons why the required monitoring equipment could not be installed by the required date.
- Description of the actions the facility will take to obtain and install the monitoring equipment as soon as reasonably feasible.
- Other information required by some subparts.

EPA reviews each application and grants the extended use of BAMM if the facility could not reasonably acquire, install, certify, and operate the required monitoring equipment by the relevant deadline despite good faith efforts by the facility. Examples of circumstances for approving extended BAMM have included technical infeasibility and safety concerns.

How are emissions calculated when BAMM is used?

The facility must still use the applicable equations specified by the GHGRP regulations, but may use a different monitoring approach (i.e., BAMM) to determine the inputs to those equations. For example, if inputs to equations are unavailable for one process line, a facility could substitute data from a very similar process line. The facility could also use an industry-accepted or company-wide emission factor or estimate these inputs using available monitoring equipment that does not meet the accuracy requirements specified by the GHGRP.

Table 1. Best Available Monitoring Methods Provisions

Subpart	Source category	Date to begin monitoring	Period for automatic BAMM	Deadline to stop using BAMM if an extension is granted	Notes
All subparts subject to calendar year 2010 reporting: C, D, E, F, G, H, K, N, O, Q, R, S, U, V, Z, AA, BB, CC, EE, GG, HH, LL, MM, NN, OO, PP		1/1/2010	January 1, 2010 - March 31, 2010	December 31, 2010	Extensions will not be approved beyond December 31, 2010, except for subparts P, X, and Y
P X Y	**P - Hydrogen Production** **X - Petrochemical Production** **Y - Petroleum Refineries**	1/1/2010	January 1, 2010 - March 31, 2010	December 31, 2015.	Extensions must be approved for each year.
Subparts subject to reporting starting in calendar year 2011		1/1/2011	Varies – see below	Varies – see below	Extensions will not be approved beyond December 31, 2011, except for subparts I, L, and W.
I	**Electronics Manufacturing**	1/1/2011	January 1, 2011 - December 31, 2011	December 31, 2013.	
L	**Fluorinated Gas Production**	1/1/2011	January 1, 2011 - June 30, 2011	December 31, 2011, unless the facility can demonstrate unique and extreme circumstances.	
T	**Magnesium Production**	1/1/2011	None	December 31, 2011.	
W	**Petroleum and Natural Gas Systems**	1/1/2011	January 1 , 2011 - December 31, 2011	December 31, 2011, unless the facility can demonstrate unique or unusual circumstances.	
DD	**Electrical Transmission and Distribution Equipment**	1/1/2011	January 1, 2011 - June 30, 2011	December 31, 2011.	
FF	**Underground Coal Mines**	1/1/2011	None	December 31, 2011.	
II	**Industrial Wastewater Treatment**	1/1/2011	None	December 31, 2011.	
QQ	**Imports and Exports of Equipment Pre–charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed–cell Foams**	1/1/2011	January 1, 2011 - June 30, 2011	December 31, 2011.	
RR	**Geologic Sequestration Carbon Dioxide**	1/1/2011	January 1, 2011 - March 31, 2011	December 31, 2011.	BAMM was allowed for only a limited number of parameters.
SS	**Manufacture of Electric Transmission and Distribution Equipment**	1/1/2011	January 1, 2011 - June 30, 2011	December 31, 2011.	
TT	**Industrial Waste Landfills**	1/1/2011	None	December 31, 2011.	
UU	**Injection of Carbon Dioxide**	1/1/2011	January 1, 2011 - March 31, 2011	December 31, 2011.	