

Greenhouse Gas Reporting Program: Update

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Agenda



- Changes to subpart HH since October 2009 Final Rule
- Subpart TT Industrial Waste Landfills
- e-GGRT user and facility registration
- CBI Updates/Corporate Parent reporting
- Efforts to reach potential reporters
- What happens once EPA gets the emissions reports

Changes to Subpart HH – MSW Landfills

- Technical corrections to several subparts finalized and published in Federal Register on October 28, 2010
 - Most corrections identified through questions and requests for clarification received through the hotline
- Most prominent changes:
 - Measuring waste quantities
 - Equation HH-1
 - Table HH-1
 - Moisture content measurements
 - Definitions added

Changes to Subpart HH - Measuring Waste Quantities



- Required to use scales if they are already in place
 - Except for passenger vehicles and light duty trucks and loads that cannot be measured using scales due to physical or operational limitations
 - Two options for scale use
 - Directly weigh each load upon entry and after it is off-loaded
 - Directly weigh each load upon entry and use a determined tare weight for representative container types

Changes to Subpart HH - Measuring Waste Quantities



- If no scales, determine working capacity or mass of waste per type of container
 - May determine volumetric capacity of containers and average density of the waste as received.
 - Can use wheel-load scales or portable axle-load scales
 - Record the number and types of containers and use working capacity to calculate waste quantities
- Reporters must also indicate whether scales are present at the landfill

Changes to Subpart HH - Equation HH-1



- First Order Decay equation
 - Replaced L_o with its components (MCF x DOC x DOC_f x F x 16/12)
 - Provides clarity of terms but does not effect actual calculation
- Provide default values for MCF (1) and DOC_f (0.5) that must be used
 - Except where there is active aeration in which case a lower MCF value may be used based on site specific parameters

Changes to Subpart HH - Equation HH-1



- K-values must be selected from Table HH-1
 - Use the k-value most appropriate for the amount of precipitation plus recirculated leachate for the majority of the past 10 years.
 - K-values based on site-specific measurements are no longer allowable for Equation HH-1
 - We expect leachate circulation to be determined based on company records or engineering estimates
 - No monitoring methods specified or required

Changes to Subpart HH – Table HH-1



- Included default k and DOC values for inerts
 - To account for non-degradable wastes found in landfills
- Added alternative "bulk MSW" option
 - Three waste categories: bulk, inerts, and C&D
 - Allows landfills to characterize wastes into categories more typical of the industry without the detail needed for the waste composition option

Changes to Subpart HH - Moisture Content Measurements



- Clarified when moisture content is needed
 - "If the CH4 content is determined on a dry basis and flow is determined on a wet basis or CH4 content is determined on a wet basis and flow is determined on a dry basis."
 - Amended Eq. HH-4 to add a moisture correction factor (K_{mc}) and included the different measurement scenarios
- Added reference to moisture content monitors

Changes to Subpart HH - Definitions

- Clarified exclusion of RCRA Subtitle C or TSCA hazardous waste landfills, C&D landfills, and industrial waste landfills
 - Definitions included for C&D and industrial waste LFs

- Amended definition of "gas collection system" to clarify that passive vents/flares are not included
 - A system collects gas actively by a fan or similar mechanical draft equipment
 - A single landfill may have more than one gas collection system

Changes to Subpart HH - Various



• Delete "install" to allow use of portable monitors

 "Weekly" clarified to be "at least once each calendar week; if only one measurement is made each calendar week, there must be at least three days between measurements"

Subpart TT – Industrial Waste Landfills



- On July 12, 2010, EPA published a final rule adding 4 new source categories to the GHGRP
 - Magnesium production (T)
 - Underground coal mines (FF)
 - Industrial wastewater treatment (II)
 - Industrial waste landfills (TT)

Subpart TT – Which landfills must report?



- Industrial waste landfills
 - Definition in 40 CFR 98.460
 - Excludes C&D and hazardous waste landfills (RCRA Subtitle C or TSCA)
- Accepted waste since January 1, 1980
 - Covers both open and closed industrial landfills
- Design capacity of 300,000 metric tons or more
- Excludes landfills that only receive inert wastes
 - List of inert wastes provided in 40 CFR 98.460(c)(2)
 - E.g. glass, plastics, brick/cement, rocks and soil from excavation

Subpart TT - Applicability



- An industrial landfill must report if it meets the criteria on the previous slide and the requirements of 40 CFR 98(a)(2):
 - Emits 25,000 metric tons of CO2e or more per year in combined emissions for all source categories (stationary combustion, etc.)
 - Applicability for subpart TT based on CH4 generation corrected for oxidation (using Equation TT-6)

Subpart TT - GHGs to report



- Report 3 items:
 - CH4 generation and emissions from the landfill
 - CH4 destruction from collection and combustion, if present
 - We do not expect industrial landfills to have gas collection
 - If gas collection exists, facilities are referred back to the monitoring requirements and calculations in subpart HH
 - CH4, CO2 and N2O from combustion devices (reported under subpart C), if present

Schedule for Monitoring and Reporting



1/1/10	Started collecting data
12/31/10	Completed 2010 data collection
1/30/11	Register facility via e-GGRT and submit certificate of representation
3/31/11	Submit GHG report for 2010
Ongoing	Submit corrected report 45 days after each discovery
Ongoing	Submit annual reports on 3/31 each year

• Under Subpart TT, industrial waste landfills must begin monitoring in January 2011 and submit their first annual report by March 31, 2012.

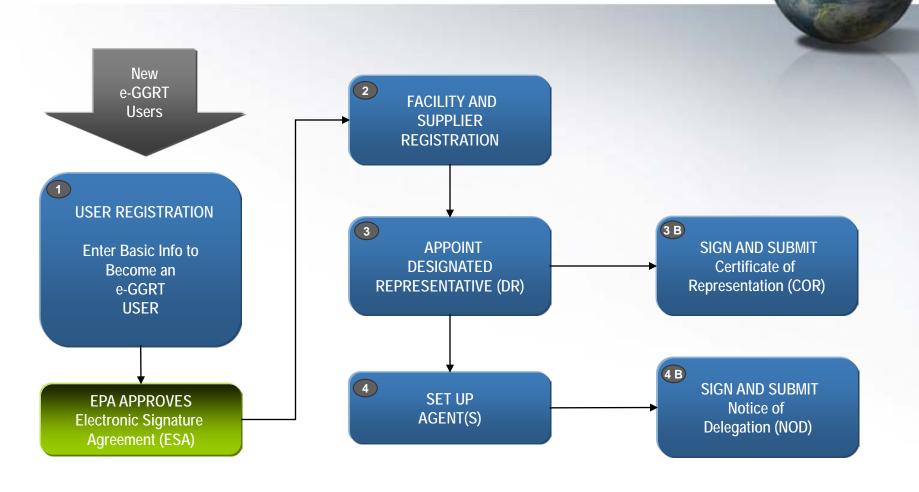
Electronic Reporting System



- All reporting under the GHG Reporting Program will be electronic.
- Web-based system for facility to EPA reporting
 - Web-forms will guide reporters through data entry and submission with built in defaults and calculations
 - Will include a mechanism to submit file directly using Extensible Markup Language (XML) format.
 - XML schema is available on the EPA website.



e-GGRT Registration Overview

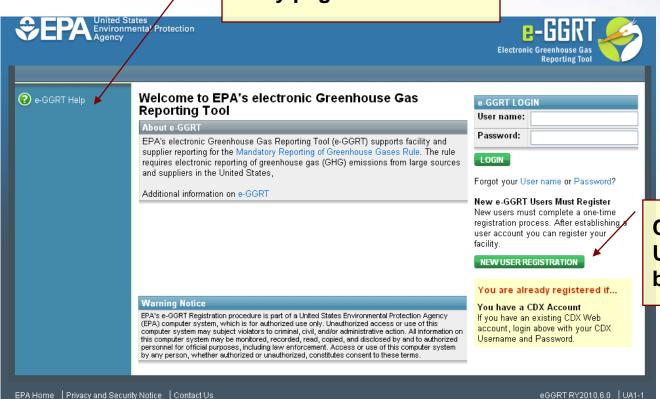


User Registration – Login Page



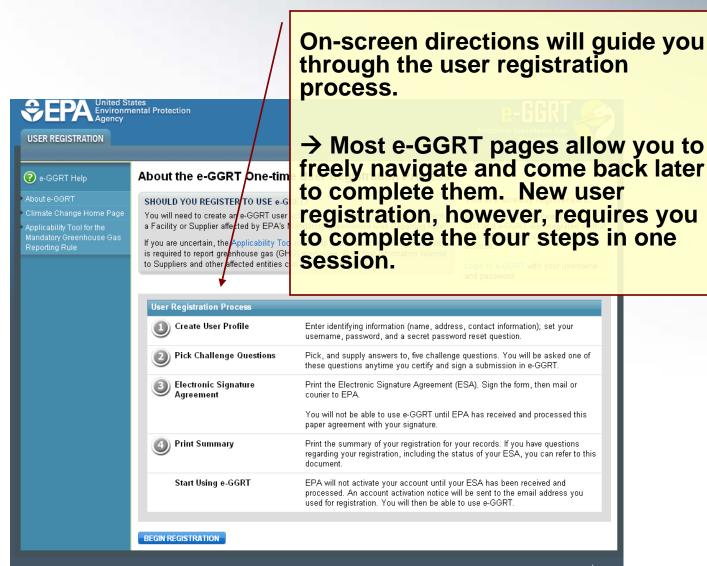
Context sensitive help on every page

As a new e-GGRT user you will start at the e-GGRT login page: https://ghgreporting.epa.gov



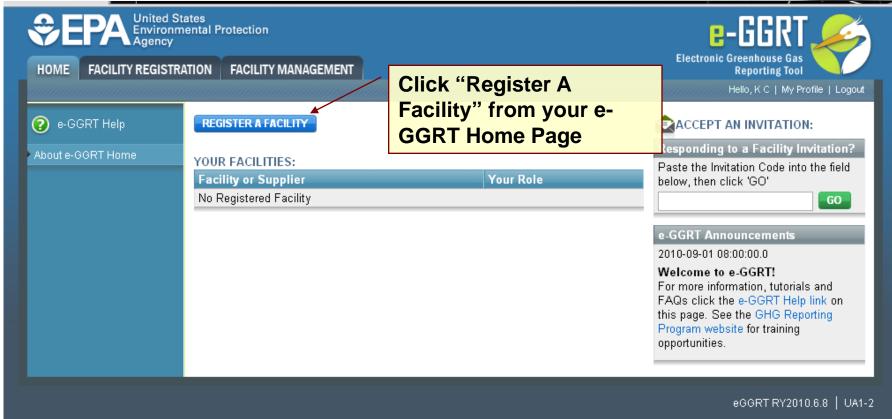
Click the green NEW USER REGISTRATION button

User Registration



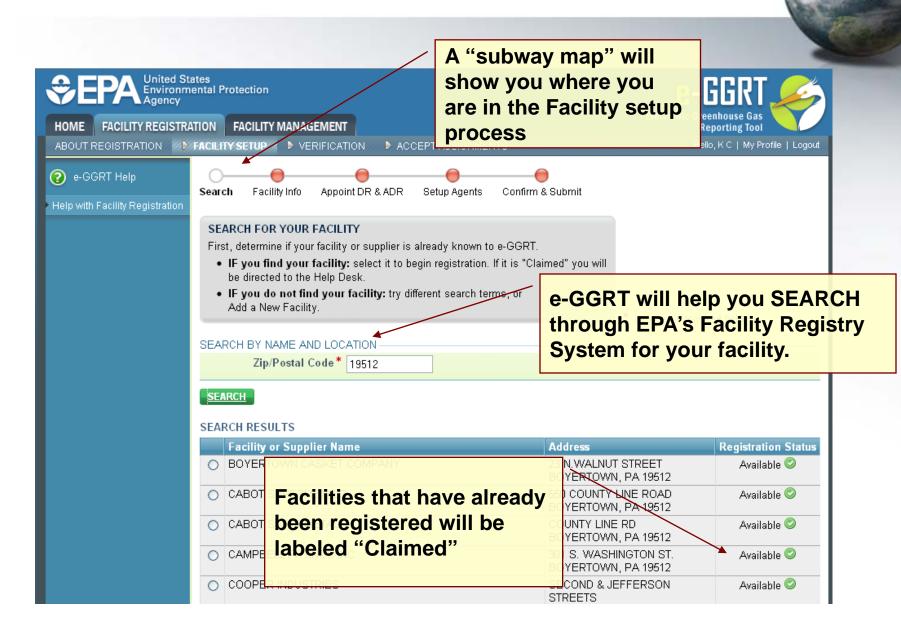
Registering a Facility





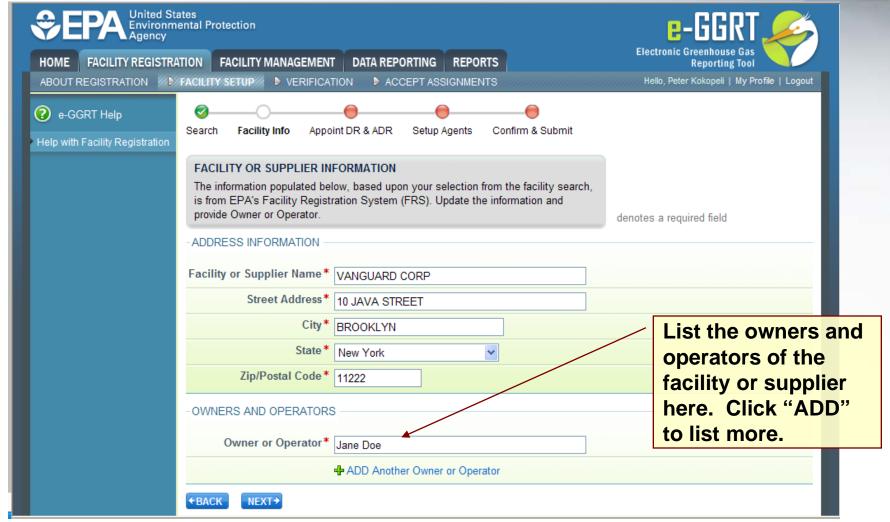
Log-In to e-GGRT at: https://ghgreporting.epa.gov

Facility Registration



Facility Registration





e-GGRT support



- Training sessions and slides
 - http://www.epa.gov/climatechange/emissions/training .html#eggrt
- E-GGRT Help Desk will be able to answer questions and provide support to e-GGRT users
- Telephone: 1-877-444-1188
- Email: GHGreporting@epa.gov
- URL: www.ccdsupport.com

Confidential Business Information (CBI)

- 3 Concurrent Actions on Confidentiality
 Determinations and Reporting Deferral on Part 98 Data
 - Interim Final: Defers the reporting date for certain data elements (inputs to emission equations) until Aug 31, 2011 for the 2010 reporting year
 - Proposed rule: Defers reporting of certain data elements for calendar years 2010, 2011, and 2012 until March 31, 2014
 - Call for Information: Review and evaluate additional information to resolve issues
- E-GGRT is equipped to handle CBI

Corporate Parent/Ownership



- On September 16, 2010 EPA finalized an amendment to the GHGRP adding 3 requirements to annual reports
 - Names and physical addresses of a facility's U.S. parent companies and the percentage of ownership of each
 - Facility's primary NAICS code and all additional NAICS codes
 - Indication if emissions from a cogeneration unit are included

Efforts to Notify Potential Reporters

- Postcard sent to 2000 landfills notifying them about the registration and reporting deadline
 - With websites to get more information
- Enforcement Alert being sent out by EPA's Enforcement Office (OECA)
 - Provides basic info on the rule
 - Lists what is considered a violation and penalties
- Email blasts to industry contacts and RSS Feed from website with notification of "what's new"
 - E.g. new rulemaking actions or availability of e-GGRT registration

What Happens Once We Get the Data - Verification Process

- Two Step Process:
 - Step 1: Electronic Verification
 - Pre-submittal warning for reporters outside reasonable ranges
 - Post-submittal verification through logic checks and statistical analysis across facilities
 - Step 2: Staff review & direct follow-up
 - Staff review verification results
 - Phone/email follow-up
 - Targeted site visits as necessary

What Happens Once We Get the Data - Publication



- Goal: Design a dynamic, easy-to-use, visually-pleasing GHG publication portal
- Milestones
 - Dec 2010 to May 2011: Define requirements, and build data mart/publication tool
 - June 2011: launch tool
- Refresh data periodically to accommodate resubmissions
- Roll out additional features in later versions

Key Resources



- Program Website: http://epa.gov/climatechange/emissions/ghgrulemaking.html
- Data System Updates and view of XML schema: http://epa.gov/climatechange/emissions/data-reporting-system.html
- **Webinars and Training:** http://www.epa.gov/climatechange/emissions/training.html
- **Email (hotline) with questions:** GHGMRR@epa.gov