

# ANNEX 7 Uncertainty

The annual U.S. Inventory presents the best effort to produce estimates for greenhouse gas source and sink categories in the United States. These estimates were generated according to the UNFCCC reporting guidelines, following the recommendations set forth in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006). This Annex provides an overview of the uncertainty analysis conducted to support the U.S. Inventory, describes the sources of uncertainty characterized throughout the Inventory associated with various source categories (including emissions and sinks), and describes the methods through which uncertainty information was collected, quantified, and presented. An Addendum to Annex 7 is provided separately which includes additional information related to the characteristics of input variables used in the development of the uncertainty estimates reported in the Inventory.

## 7.1. Overview

The primary purpose of the uncertainty analysis conducted in support of the U.S. Inventory is (1) to determine the quantitative uncertainty associated with the emission (and removal) estimates presented in the main body of this report based on the uncertainty associated with the input parameters used in the emission (and removal) estimation methodologies and (2) to evaluate the relative importance of the input parameters in contributing to uncertainty in the associated source or sink category inventory estimate and in the overall inventory estimate. Thus, the U.S. Inventory uncertainty analysis provides a strong foundation for developing future improvements to the inventory estimation process. For each source or sink category, the analysis highlights opportunities for changes to data measurement, data collection, and calculation methodologies. These are presented in the “Planned Improvements” sections of each source or sink category’s discussion in the main body of the report.

For some of the current estimates, such as CO<sub>2</sub> emissions from energy-related combustion activities, the impact of uncertainties on overall emission estimates is believed to be relatively small. For some other limited categories of emissions, uncertainties could have a larger impact on the estimates presented (i.e. storage factors of non-energy uses of fossil fuels). As noted, for all source categories, the inventory emission estimates include “Uncertainty and Time-Series Consistency” sections that consider both quantitative and qualitative assessments of uncertainty, considering factors consistent with good practices noted in Volume 1, Chapter 3 of the *2006 IPCC Guidelines* (i.e., completeness of data, representativeness of data and models, sampling errors, measurement errors, etc.). The two major types of uncertainty associated with these emission estimates are (1) model uncertainty, which arises when the emission and/or removal estimation models used in developing the Inventory estimates do not fully and accurately characterize the respective emission and/or removal processes (due to a lack of technical details or other resources), resulting in the use of incorrect or incomplete estimation methodologies, and (2) parameter uncertainty, which arises due to a lack of precise input data such as emission factors and activity data.

The model uncertainty can be partially analyzed by comparing the model results with those of other models developed to characterize the same emission (or removal) process, after taking into account the differences in their conceptual framework, capabilities, data, and assumptions. However, it would be very difficult—if not impossible—to quantify the model uncertainty associated with the emission estimates (primarily because, in most cases, only a single model has been developed to estimate emissions from any one source). Therefore, model uncertainty was not quantified in this report. Nonetheless, it has been discussed qualitatively, where appropriate, along with the individual source or sink category description and inventory estimation methodology.

Parameter uncertainty encompasses several causes such as lack of completeness, lack of data or representative data, sampling error, random or systematic measurement error, misreporting or misclassification, or missing data. Parameter uncertainty is, therefore, the principal type and source of uncertainty associated with the national Inventory emission estimates and is the main focus of the quantitative uncertainty analyses in this report. Parameter uncertainty has been quantified for all of the emission sources and sinks included in the U.S. Inventory totals, with the exception of one very small emission source category, CH<sub>4</sub> emissions from Incineration of Waste, given the very low emissions for CH<sub>4</sub> from Incineration of Waste, no uncertainty estimate was derived. Uncertainty associated with three other source categories (International Bunker Fuels, Energy Sources of Indirect Greenhouse Gas Emissions, and CO<sub>2</sub> emissions from Wood Biomass and Biofuel Consumption) whose emissions are not included in the Inventory totals is discussed qualitatively in their respective sections in the main body of the report.

## 7.2. Methodology and Results

The United States has developed a quality assurance and quality control (QA/QC) and uncertainty management plan (EPA 2002). Like the QA/QC plan, the uncertainty management plan is part of a continually evolving process. The

1 uncertainty management plan provides for a quantitative assessment of the Inventory analysis itself, thereby contributing to  
2 continuing efforts to understand both what causes uncertainty and how to improve Inventory quality. Although the plan  
3 provides both general and specific guidelines for implementing quantitative uncertainty analysis, its components are  
4 intended to evolve over time, consistent with the inventory estimation process. The U.S. plan includes procedures and  
5 guidelines, and forms and templates, for developing quantitative assessments of uncertainty in the national Inventory  
6 estimates (EPA 2002). For the 1990 through 2017 Inventory, EPA has used the uncertainty management plan as well as the  
7 methodology presented in the *2006 IPCC Guidelines*.

8         The *2006 IPCC Guidelines* recommends two methods—Approach 1 and Approach 2—for developing quantitative  
9 estimates of uncertainty in the inventory estimate of individual source categories and the overall Inventory. Of these, the  
10 Approach 2 method is both more flexible and reliable than Approach 1; both approaches are described in the next section.  
11 The United States is in the process of implementing a multi-year strategy to develop quantitative estimates of uncertainty  
12 for all source categories using the Approach 2. In following the UNFCCC requirement under Article 4.1, emissions from  
13 International Bunker Fuels, Wood Biomass and Biofuel Consumption, and Indirect Greenhouse Gas Emissions are not  
14 included in the total emissions estimated for the U.S. Inventory; therefore, no quantitative uncertainty estimates have been  
15 developed for these source categories.<sup>133</sup> CO<sub>2</sub> Emissions from Biomass and Biofuel Consumption are accounted for  
16 implicitly in the Land Use, Land-Use Change and Forestry (LULUCF) chapter through the calculation of changes in carbon  
17 stocks. The Energy sector does provide an estimate of CO<sub>2</sub> emissions from Biomass and Biofuel Consumption provided as  
18 a memo item for informational purposes consistent with the UNFCCC reporting requirements.

### 19         **Approach 1 and Approach 2 Methods**

20         The Approach 1 method for estimating uncertainty is based on the error propagation equation. This equation  
21 combines the uncertainty associated with the activity data and the uncertainty associated with the emission (or the other)  
22 factors. The Approach 1 method is applicable where emissions (or removals) are usually estimated as the product of an  
23 activity value and an emission factor or as the sum of individual sub-source or sink category values. Inherent in employing  
24 the Approach 1 method are the assumptions that, for each source and sink category, (i) both the activity data and the emission  
25 factor values are approximately normally distributed, (ii) the coefficient of variation (i.e., the ratio of the standard deviation  
26 to the mean) associated with each input variable is less than 30 percent, and (iii) the input variables within and across sub-  
27 source categories are not correlated (i.e., value of each variable is independent of the values of other variables).

28         The Approach 2 method is preferred (i) if the uncertainty associated with the input variables is significantly large,  
29 (ii) if the distributions underlying the input variables are not normal, (iii) if the estimates of uncertainty associated with the  
30 input variables are correlated, and/or (iv) if a sophisticated estimation methodology and/or several input variables are used  
31 to characterize the emission (or removal) process correctly. In practice, the Approach 2 is the preferred method of uncertainty  
32 analysis for all source categories where sufficient and reliable data are available to characterize the uncertainty of the input  
33 variables.

34         The Approach 2 method employs the Monte Carlo Stochastic Simulation technique (also referred to as the Monte  
35 Carlo method). Under this method, estimates of emissions (or removals) for a particular source or sink category are generated  
36 many times (equal to the number of simulations specified) using an uncertainty model, which is an emission (or removal)  
37 estimation equation that imitates or is the same as the inventory estimation model for a particular source or sink category.  
38 These estimates are generated using the respective, randomly-selected values for the constituent input variables using  
39 commercially available simulation software such as @RISK.

### 40         **Characterization of Uncertainty in Input Variables**

41         Both Approach 1 and Approach 2 uncertainty analyses require that all the input variables are well-characterized in  
42 terms of their Probability Density Functions (PDFs). In the absence of particularly convincing data measurements, sufficient  
43 data samples, or expert judgments that determined otherwise, the PDFs incorporated in the current source or sink category  
44 uncertainty analyses were limited to normal, lognormal, uniform, triangular, and beta distributions. The choice among these  
45 five PDFs depended largely on the observed or measured data and expert judgment.

### 46         **Source and Sink Category Inventory Uncertainty Estimates**

47         Discussion surrounding the input parameters and sources of uncertainty for each source and sink category appears  
48 in the body of this report. Table A-284 summarizes results based on assessments of source and sink category-level

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<sup>133</sup> However, because the input variables that determine the emissions from the Fossil Fuel Combustion and the International Bunker Fuels source categories are correlated, uncertainty associated with the activity variables in the International Bunker Fuels was taken into account in estimating the uncertainty associated with the Fossil Fuel Combustion.

uncertainty. The table presents base year (1990 or 1995) and current year (2017) emissions for each source and sink category. The combined uncertainty (at the 95 percent confidence interval) for each source and category is expressed as the percentage deviation above and below the total 2017 emissions estimated for that source and category. Source or sink category trend uncertainty is described subsequently in this Appendix.

**Table A-284: Summary Results of Source and Sink Category Uncertainty Analyses- TO BE UPDATED FOR FINAL INVENTORY REPORT**

Source or Sink Category	Base Year Emissions <sup>a</sup>	2016 Emissions <sup>b</sup>	2016 Uncertainty <sup>b</sup>	
	MMT CO <sub>2</sub> Eq.	MMT CO <sub>2</sub> Eq.	Low	High
<b>CO<sub>2</sub></b>	<b>5,121.3</b>	<b>5,310.9</b>	<b>-2%</b>	<b>5%</b>
Fossil Fuel Combustion	4,740.3	4,966.0	-2%	5%
Non-Energy Use of Fuels	119.5	112.2	-19%	39%
Iron and Steel Production & Metallurgical Coke Production	101.6	42.3	-17%	17%
Cement Production	33.5	39.4	-6%	6%
Petrochemical Production	21.2	28.1	-5%	5%
Natural Gas Systems	29.8	25.5	-16%	17%
Petroleum Systems	7.7	22.8	-30%	34%
Lime Production	11.7	12.9	-2%	2%
Ammonia Production	13.0	12.2	-7%	7%
Other Process Uses of Carbonates	6.3	11.0	-12%	15%
Incineration of Waste	8.0	10.7	-22%	26%
Urea Fertilization	2.4	5.1	-43%	3%
Carbon Dioxide Consumption	1.5	4.5	-5%	5%
Urea Consumption for Non-Agricultural Purposes	3.8	4.0	-12%	12%
Liming	4.7	3.9	-111%	88%
Ferroalloy Production	2.2	1.8	-12%	12%
Soda Ash Production	1.4	1.7	-9%	8%
Titanium Dioxide Production	1.2	1.6	-12%	13%
Aluminum Production	6.8	1.3	-3%	2%
Glass Production	1.5	1.2	-4%	4%
Phosphoric Acid Production	1.5	1.0	-19%	21%
Zinc Production	0.6	0.9	-16%	16%
Lead Production	0.5	0.5	-14%	15%
Silicon Carbide Production and Consumption	0.4	0.2	-9%	9%
Abandoned Oil and Gas Wells	+	+	-83%	215%
Magnesium Production and Processing	+	+	-2%	2%
Wood Biomass, Ethanol, and Biodiesel Consumption <sup>c</sup>	219.4	309.3	NE	NE
International Bunker Fuels <sup>d</sup>	103.5	116.6	NE	NE
<b>CH<sub>4</sub></b>	<b>779.9</b>	<b>657.4</b>	<b>-3%</b>	<b>19%</b>
Enteric Fermentation	164.2	170.1	-11%	18%
Natural Gas Systems	195.2	163.5	-16%	17%
Landfills	179.6	107.7	-23%	23%
Manure Management	37.2	67.7	-18%	20%
Coal Mining	96.5	53.8	-12%	14%
Petroleum Systems	39.8	38.6	-30%	34%
Wastewater Treatment	15.7	14.8	-27%	23%
Rice Cultivation	16.0	13.7	-32%	64%
Stationary Combustion	8.6	7.3	-30%	114%
Abandoned Oil and Gas Wells	6.5	7.1	-83%	215%
Abandoned Underground Coal Mines	7.2	6.7	-18%	22%
Mobile Combustion	12.7	3.64	-7%	26%
Composting	0.4	2.1	-50%	50%
Field Burning of Agricultural Residues	0.2	0.3	-14%	14%
Petrochemical Production	0.2	0.2	-57%	46%
Ferroalloy Production	+	+	-12%	12%
Silicon Carbide Production and Consumption	+	+	-9%	10%
Iron and Steel Production & Metallurgical Coke Production	+	+	-20%	20%
Incineration of Waste	+	+	NE	NE

<i>International Bunker Fuels<sup>d</sup></i>	0.2	0.1	NE	NE
<b>N<sub>2</sub>O</b>	<b>354.8</b>	<b>369.5</b>	<b>-13%</b>	<b>22%</b>
Agricultural Soil Management	250.5	283.6	-24%	39%
<i>Direct</i>	212.0	237.6	-16%	16%
<i>Indirect</i>	38.5	45.9	-65%	154%
Stationary Combustion	11.1	18.6	-22%	52%
Mobile Combustion	41.7	18.4	-9%	14%
Manure Management	14.0	18.1	-16%	24%
Nitric Acid Production	12.1	10.2	-5%	5%
Adipic Acid Production	15.2	7.0	-5%	5%
Wastewater Treatment	3.4	5.0	-75%	112%
N <sub>2</sub> O from Product Uses	4.2	4.2	-24%	24%
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.7	2.0	-31%	31%
Composting	0.3	1.9	-50%	50%
Incineration of Waste	0.5	0.3	-51%	327%
Semiconductor Manufacture	+	0.2	-12%	12%
Field Burning of Agricultural Residues	0.1	0.1	-14%	14%
<i>International Bunker Fuels<sup>d</sup></i>	0.9	1.0	NE	NE
<b>HFCs, PFCs, SF<sub>6</sub> and NF<sub>3</sub></b>	<b>130.8</b>	<b>173.5</b>	<b>-3%</b>	<b>11%</b>
Substitution of Ozone Depleting Substances	31.4	159.1	-3%	12%
Semiconductor Manufacture	3.6	4.7	-6%	6%
Electrical Transmission and Distribution	23.1	4.3	-13%	14%
HCFC-22 Production	46.1	2.8	-7%	10%
Aluminum Production	21.5	1.4	-8%	8%
Magnesium Production and Processing	5.2	1.1	-5%	5%
<b>Total Emissions<sup>a</sup></b>	<b>6,355.6</b>	<b>6,511.3</b>	<b>-1%</b>	<b>5%</b>
<b>LULUCF Emissions<sup>f</sup></b>	<b>10.6</b>	<b>38.1</b>	<b>-40%</b>	<b>73%</b>
<b>LULUCF Carbon Stock Change<sup>g</sup></b>	<b>(830.2)</b>	<b>(754.9)</b>	<b>-21%</b>	<b>30%</b>
<b>LULUCF Sector Net Total<sup>h</sup></b>	<b>(819.6)</b>	<b>(716.8)</b>	<b>-22%</b>	<b>31%</b>
<b>Net Emissions (Sources and Sinks)</b>	<b>5,536.0</b>	<b>5,794.5</b>	<b>-3%</b>	<b>6%</b>

+ Does not exceed 0.05 MMT CO<sub>2</sub> Eq.

NE (Not Estimated)

<sup>a</sup> Base Year is 1990 for all sources except Substitution of Ozone Depleting Substances, for which the United States has chosen 1995.

<sup>b</sup> The uncertainty estimates correspond to a 95 percent confidence interval, with the lower bound corresponding to 2.5<sup>th</sup> percentile and the upper bound corresponding to 97.5<sup>th</sup> percentile.

<sup>c</sup> Emissions from Wood Biomass and Biofuel Consumption are not included in summing energy sector totals.

<sup>d</sup> Emissions from International Bunker Fuels are not included in the totals.

<sup>e</sup> Totals exclude emissions for which uncertainty was not quantified.

<sup>f</sup> LULUCF emissions include the CH<sub>4</sub> and N<sub>2</sub>O emissions reported for *Peatlands Remaining Peatlands*, *Forest Fires*, *Drained Organic Soils*, *Grassland Fires*, and *Coastal Wetlands Remaining Coastal Wetlands*; CH<sub>4</sub> emissions from *Land Converted to Coastal Wetlands*; and N<sub>2</sub>O emissions from *Forest Soils* and *Settlement Soils*.

<sup>g</sup> LULUCF Carbon Stock Change is the net C stock change from the following categories: *Forest Land Remaining Forest Land*, *Land Converted to Forest Land*, *Cropland Remaining Cropland*, *Land Converted to Cropland*, *Grassland Remaining Grassland*, *Land Converted to Grassland*, *Wetlands Remaining Wetlands*, *Land Converted to Wetlands*, *Settlements Remaining Settlements*, and *Land Converted to Settlements*.

<sup>h</sup> The LULUCF Sector Net Total is the net sum of all CH<sub>4</sub> and N<sub>2</sub>O emissions to the atmosphere plus net carbon stock changes.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration. Total emissions (excluding emissions for which uncertainty was not quantified) is presented without LULUCF. Net emissions is presented with LULUCF.

## Overall (Aggregate) Inventory Level Uncertainty Estimates

The overall level uncertainty estimate for the U.S. Inventory was developed using the IPCC Approach 2 uncertainty estimation methodology. The uncertainty models of all the emission source categories could not be directly integrated to develop the overall uncertainty estimates due to software constraints in integrating multiple, large uncertainty models. Therefore, an alternative approach was adopted to develop the overall uncertainty estimates. The Monte Carlo simulation output data for each emission source or sink category uncertainty analysis were combined by type of gas and the probability distributions were fitted to the combined simulation output data, where such simulated output data were available. If such detailed output data were not available for particular emissions sources, individual probability distributions were assigned to those source or sink category emission estimates based on the most detailed data available from the quantitative uncertainty analysis performed.

For Composting and parts of Agricultural Soil Management source categories, Approach 1 uncertainty results were used in the overall uncertainty analysis estimation. However, for all other emission sources (excluding international bunker

fuels, CO<sub>2</sub> from biomass and biofuel combustion, and CH<sub>4</sub> from incineration of waste), Approach 2 uncertainty results were used in the overall uncertainty estimation.

The overall uncertainty model results indicate that the 2016 U.S. greenhouse gas emissions are estimated to be within the range of approximately 6,439.6 to 6,835.2 MMT CO<sub>2</sub> Eq., reflecting a relative 95 percent confidence interval uncertainty range of -1 percent to 5 percent with respect to the total U.S. greenhouse gas emission estimate of approximately 6,511.3 MMT CO<sub>2</sub> Eq. The uncertainty interval associated with total CO<sub>2</sub> emissions, which constitute about 82 percent of the total U.S. greenhouse gas emissions in 2016, ranges from -2 percent to 5 percent of total CO<sub>2</sub> emissions estimated. The results indicate that the uncertainty associated with the inventory estimate of the total CH<sub>4</sub> emissions ranges from -3 percent to 19 percent, uncertainty associated with the total inventory N<sub>2</sub>O emission estimate ranges from -13 percent to 22 percent, and uncertainty associated with fluorinated greenhouse gas (F-GHG) emissions ranges from -3 percent to 11 percent.

A summary of the overall quantitative uncertainty estimates is shown below.

**Table A-285: Quantitative Uncertainty Assessment of Overall National Inventory Emissions (MMT CO<sub>2</sub> Eq. and Percent)- TO BE UPDATED FOR FINAL INVENTORY REPORT**

Gas	2016 Emission					Standard	
	Estimate	Uncertainty Range Relative to Emission Estimate <sup>a</sup>				Mean <sup>b</sup>	Deviation <sup>b</sup>
	(MMT CO <sub>2</sub> Eq.)	(MMT CO <sub>2</sub> Eq.)		(%)		(MMT CO <sub>2</sub> Eq.)	
		Lower Bound <sup>c</sup>	Upper Bound <sup>c</sup>	Lower Bound	Upper Bound		
CO <sub>2</sub>	5,310.9	5,211.4	5,555.2	-2%	5%	5,379.4	88.4
CH <sub>4</sub> <sup>d</sup>	657.4	637.0	780.8	-3%	19%	699.0	36.3
N <sub>2</sub> O <sup>d</sup>	369.5	321.7	451.8	-13%	22%	375.1	33.4
PFC, HFC, SF <sub>6</sub> , and NF <sub>3</sub> <sup>d</sup>	173.5	168.4	192.1	-3%	11%	180.3	6.1
<b>Total Emissions</b>	<b>6511.3</b>	<b>6,439.6</b>	<b>6,835.2</b>	<b>-1%</b>	<b>5%</b>	<b>6,633.8</b>	<b>101.2</b>
<b>LULUCF Emissions<sup>e</sup></b>	<b>38.1</b>	<b>22.8</b>	<b>65.7</b>	<b>-40%</b>	<b>73%</b>	<b>38.4</b>	<b>11.2</b>
<b>LULUCF Carbon Stock Change Flux<sup>f</sup></b>	<b>(754.9)</b>	<b>(979.5)</b>	<b>-598.2</b>	<b>-21%</b>	<b>30%</b>	<b>(790.5)</b>	<b>96.9</b>
<b>LULUCF Sector Net Total<sup>g</sup></b>	<b>(716.8)</b>	<b>(940.3)</b>	<b>-560.5</b>	<b>-22%</b>	<b>31%</b>	<b>(752.0)</b>	<b>97.4</b>
<b>Net Emissions (Sources and Sinks)</b>	<b>5,794.5</b>	<b>5,607.0</b>	<b>6,155.0</b>	<b>-3%</b>	<b>6%</b>	<b>5,881.8</b>	<b>140.9</b>

<sup>a</sup> The lower and upper bounds for emission estimates correspond to a 95 percent confidence interval, with the lower bound corresponding to 2.5<sup>th</sup> percentile and the upper bound corresponding to 97.5<sup>th</sup> percentile.

<sup>b</sup> Mean value indicates the arithmetic average of the simulated emission estimates; standard deviation indicates the extent of deviation of the simulated values from the mean.

<sup>c</sup> The lower and upper bound emission estimates for the sub-source categories do not sum to total emissions because the low and high estimates for total emissions were calculated separately through simulations.

<sup>d</sup> The overall uncertainty estimates did not take into account the uncertainty in the GWP values for CH<sub>4</sub>, N<sub>2</sub>O and high GWP gases used in the inventory emission calculations for 2016.

<sup>e</sup> LULUCF emissions include the CH<sub>4</sub> and N<sub>2</sub>O emissions reported for *Peatlands Remaining Peatlands*, *Forest Fires*, *Drained Organic Soils*, *Grassland Fires*, and *Coastal Wetlands Remaining Coastal Wetlands*; CH<sub>4</sub> emissions from *Land Converted to Coastal Wetlands*; and N<sub>2</sub>O emissions from *Forest Soils* and *Settlement Soils*.

<sup>f</sup> LULUCF Carbon Stock Change is the net C stock change from the following categories: *Forest Land Remaining Forest Land*, *Land Converted to Forest Land*, *Cropland Remaining Cropland*, *Land Converted to Cropland*, *Grassland Remaining Grassland*, *Land Converted to Grassland*, *Wetlands Remaining Wetlands*, *Land Converted to Wetlands*, *Settlements Remaining Settlements*, and *Land Converted to Settlements*.

<sup>g</sup> The LULUCF Sector Net Total is the net sum of all CH<sub>4</sub> and N<sub>2</sub>O emissions to the atmosphere plus net carbon stock changes.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration. Total emissions (excluding emissions for which uncertainty was not quantified) is presented without LULUCF. Net emissions is presented with LULUCF.

## Trend Uncertainty

In addition to the estimates of uncertainty associated with the current year's emission estimates, this Annex also presents the estimates of trend uncertainty. The 2006 IPCC Guidelines defines trend as the difference in emissions between the base year (i.e., 1990) and the current year (i.e., 2017) Inventory estimates. However, for purposes of understanding the concept of trend uncertainty, the emission trend is defined in this Inventory as the percentage change in the emissions (or removal) estimated for the current year, relative to the emission (or removal) estimated for the base year. The uncertainty associated with this emission trend is referred to as trend uncertainty.

Under the Approach 1 method, the trend uncertainty for a source and sink category is estimated using the sensitivity of the calculated difference between the base year and the current year (i.e., 2017) emissions to an incremental (i.e., 1 percent) increase in one or both of these values for that source and sink category. The two sensitivities are expressed as percentages: Type A sensitivity highlights the effect on the difference between the base and the current year emissions

caused by a 1 percent change in both, while Type B sensitivity highlights the effect caused by a change to only the current year's emissions. Both sensitivities are simplifications introduced in order to analyze the correlation between the base and the current year estimates. Once calculated, the two sensitivities are combined using the error propagation equation to estimate the overall trend uncertainty.

Under the Approach 2 method, the trend uncertainty is estimated using the Monte Carlo Stochastic Simulation technique. The trend uncertainty analysis takes into account the fact that the base and the current year estimates often share input variables. For purposes of the current Inventory, a simple approach has been adopted, under which the base year source or sink category emissions are assumed to exhibit the same uncertainty characteristics as the current year emissions (or removals). Source and sink category-specific PDFs for base year estimates were developed using current year (i.e., 2017) uncertainty output data. These were adjusted to account for differences in magnitude between the two years' inventory estimates. Then, for each source and sink category, a trend uncertainty estimate was developed using the Monte Carlo method. The overall inventory trend uncertainty estimate was developed by combining all source and sink category-specific trend uncertainty estimates. These trend uncertainty estimates present the range of likely change from base year to 2017, and are shown in Table A-286.

**Table A-286: Quantitative Assessment of Trend Uncertainty (MMT CO<sub>2</sub> Eq. and Percent)-TO BE UPDATED FOR FINAL INVENTORY REPORT**

Gas/Source	Base Year	2016	Emissions	Trend Range <sup>b</sup>	
	Emissions <sup>a</sup>	Emissions	Trend	Trend Range <sup>b</sup>	
	(MMT CO <sub>2</sub> Eq.)	(MMT CO <sub>2</sub> Eq.)	(%)	(%)	(%)
				Lower Bound	Upper Bound
<b>CO<sub>2</sub></b>	<b>5,121.3</b>	<b>5,310.9</b>	<b>4%</b>	<b>-1%</b>	<b>9%</b>
Fossil Fuel Combustion	4,740.3	4,966.0	5%	0%	10%
Non-Energy Use of Fuels	119.5	112.2	-6%	-36%	40%
Natural Gas Systems	29.8	25.5	-14%	-40%	21%
Cement Production	33.5	39.4	18%	8%	29%
Lime Production	11.7	12.9	11%	8%	14%
Other Process Uses of Carbonates	6.3	11.0	74%	45%	111%
Soda Ash Production	1.4	1.7	20%	6%	37%
Carbon Dioxide Consumption	1.5	4.5	204%	183%	226%
Incineration of Waste	8.0	10.7	34%	-5%	89%
Titanium Dioxide Production	1.2	1.6	35%	12%	61%
Aluminum Production	6.8	1.3	-80%	-81%	-80%
Iron and Steel Production & Metallurgical Coke Production	101.6	42.3	-58%	-68%	-47%
Ferroalloy Production	2.2	1.8	-17%	-30%	-1%
Glass Production	1.5	1.2	-19%	-24%	-14%
Ammonia Production	13.0	12.2	-7%	-16%	4%
Urea Consumption for Non-Agricultural Purposes	3.8	4.0	5%	-13%	24%
Phosphoric Acid Production	1.5	1.0	-35%	-52%	-13%
Petrochemical Production	21.2	28.1	33%	23%	43%
Silicon Carbide Production and Consumption	0.4	0.2	-54%	-59%	-47%
Lead Production	0.5	0.5	-7%	-25%	15%
Zinc Production	0.6	0.9	46%	16%	84%
Liming	4.7	3.9	-17%	-105%	342%
Urea Fertilization	2.4	5.1	111%	39%	222%
Petroleum Systems	7.7	22.8	196%	28%	577%
Abandoned Oil and Gas Wells	+	+	15%	-110%	521%
Magnesium Production and Processing	+	+	95%	89%	102%
Wood Biomass and Biofuel Consumption <sup>c</sup>	219.4	309.3	41%	NE	NE
International Bunker Fuel <sup>d</sup>	103.5	116.6	13%	NE	NE
<b>CH<sub>4</sub></b>	<b>779.9</b>	<b>657.4</b>	<b>-16%</b>	<b>-27%</b>	<b>-4%</b>
Stationary Combustion	8.6	7.3	-15%	-63%	98%
Mobile Combustion	12.7	3.6	-71%	-77%	-64%
Coal Mining	96.5	53.8	-44%	-66%	-48%
Abandoned Underground Coal Mines	7.2	6.7	-7%	-38%	32%
Natural Gas Systems	195.2	163.5	-16%	-41%	19%
Petroleum Systems	39.8	38.6	-3%	-58%	119%
Abandoned Oil and Gas Wells	6.5	7.1	9%	-82%	254%
Petrochemical Production	0.2	0.2	12%	-55%	172%
Silicon Carbide Production and Consumption	+	+	-67%	-71%	-62%
Iron and Steel Production & Metallurgical Coke Production	+	+	-65%	-74%	-54%
Ferroalloy Production	+	+	-26%	-38%	-12%

Enteric Fermentation	164.2	170.1	4%	-15%	28%
Manure Management	37.2	67.7	82%	23%	156%
Rice Cultivation	16.0	13.7	-14%	-67%	119%
Field Burning of Agricultural Residues	0.2	0.3	20%	-36%	121%
Landfills	179.6	107.7	-40%	-57%	-17%
Wastewater Treatment	15.7	14.8	-5%	-35%	38%
Composting	0.4	2.1	455%	147%	1157%
Incineration of Waste	+	+	-32%	NE	NE
<i>International Bunker Fuels<sup>d</sup></i>	0.2	0.1	-43%	NE	NE
<b>N<sub>2</sub>O</b>	<b>354.8</b>	<b>369.5</b>	<b>4%</b>	<b>-25%</b>	<b>55%</b>
Stationary Combustion	11.1	18.6	68%	3%	177%
Mobile Combustion	41.7	18.4	-56%	-62%	-48%
Adipic Acid Production	15.2	7.0	-54%	-57%	-51%
Nitric Acid Production	12.1	10.2	-16%	-22%	-10%
Manure Management	14.0	18.1	30%	-1%	71%
Agricultural Soil Management	250.5	283.6	13%	-31%	85%
Field Burning of Agricultural Residues	0.1	0.1	21%	-23%	88%
Wastewater Treatment	3.4	5.0	46%	-68%	533%
N <sub>2</sub> O from Product Uses	4.2	4.2	0%	-33%	46%
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.7	2.0	21%	-25%	94%
Incineration of Waste	0.5	0.3	-32%	-85%	227%
Settlement Soils	1.4	2.5	75%	-3%	215%
Composting	0.3	1.9	455%	148%	1128%
Semiconductor Manufacture	+	0.2	555%	453%	673%
<i>International Bunker Fuels<sup>d</sup></i>	0.9	1.0	15%	NE	NE
<b>HFCs, PFCs, SF<sub>6</sub>, and NF<sub>3</sub></b>	<b>130.3</b>	<b>184.7</b>	<b>42%</b>	<b>36%</b>	<b>56%</b>
Substitution of Ozone Depleting Substances	31.4	159.1	406%	357%	461%
HCFC-22 Production	46.1	2.8	-94%	-95%	-93%
Semiconductor Manufacture	3.6	4.7	33%	23%	44%
Aluminum Production	21.5	1.4	-94%	-94%	-93%
Electrical Transmission and Distribution	23.1	4.3	-81%	-84%	-78%
Magnesium Production and Processing	5.2	1.1	-78%	-82%	-79%
<b>Total Emissions<sup>e</sup></b>	<b>6,386.8</b>	<b>6,511.3</b>	<b>2%</b>	<b>-2%</b>	<b>7%</b>
<b>LULUCF Emissions<sup>f</sup></b>	<b>10.6</b>	<b>38.1</b>	<b>258%</b>	<b>92%</b>	<b>684%</b>
<b>LULUCF Carbon Stock Change<sup>g</sup></b>	<b>(830.2)</b>	<b>(754.9)</b>	<b>-9%</b>	<b>-36%</b>	<b>28%</b>
<b>LULUCF Sector Net Total<sup>h</sup></b>	<b>(819.6)</b>	<b>(716.8)</b>	<b>-13%</b>	<b>-39%</b>	<b>25%</b>
<b>Net Emissions (Sources and Sinks)</b>	<b>5,567.2</b>	<b>5,794.5</b>	<b>4%</b>	<b>-3%</b>	<b>12%</b>

+ Does not exceed 0.05 MMT CO<sub>2</sub> Eq.

NE (Not Estimated)

<sup>a</sup> Base Year is 1990 for all sources except Substitution of Ozone Depleting Substances, for which the United States has chosen 1995.

<sup>b</sup> The trend range represents a 95 percent confidence interval for the emission trend, with the lower bound corresponding to 2.5th percentile value and the upper bound corresponding to 97.5th percentile value.

<sup>c</sup> Emissions from Wood Biomass and Biofuel Consumption are not included specifically in summing energy sector totals.

<sup>d</sup> Emissions from International Bunker Fuels are not included in the totals.

<sup>e</sup> Totals exclude emissions for which uncertainty was not quantified.

<sup>f</sup> LULUCF emissions include the CH<sub>4</sub> and N<sub>2</sub>O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH<sub>4</sub> emissions from Land Converted to Coastal Wetlands; and N<sub>2</sub>O emissions from Forest Soils and Settlement Soils.

<sup>g</sup> LULUCF Carbon Stock Change is the net C stock change from the following categories: *Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.*

<sup>h</sup> The LULUCF Sector Net Total is the net sum of all CH<sub>4</sub> and N<sub>2</sub>O emissions to the atmosphere plus net carbon stock changes.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration. Total emissions (excluding emissions for which uncertainty was not quantified) is presented without LULUCF. Net emissions is presented with LULUCF.

### 7.3. Reducing Uncertainty

There have been many improvements in reducing uncertainties across source and sink categories over the last several years. These improvements are result of new data sources that provide more accurate data or more coverage, as well as methodological improvements. Several source categories now use the U.S. EPA's GHGRP reported data, which is an improvement over prior methods using default emission factors and provides more country-specific data for Inventory calculations. EPA's GHGRP relies on facility-level data which undergoes a multi-step verification process, including automated data checks to ensure consistency, comparison against expected ranges for similar facilities and industries, and statistical analysis.

For example, the use of EPA's GHGRP reported data to estimate CH<sub>4</sub> emissions from Coal Mining resulted in the uncertainty bounds of -12 to 14 percent in the 1990 to 2016 Inventory, which was an improvement over the uncertainty bounds in the 1990 to 2011 Inventory of -15 to 18 percent. Prior to 2012, Coal Mining emissions were estimated using an array of emission factor estimations with higher assumed uncertainty. Estimates of CH<sub>4</sub> emissions from MSW landfills were also revised with the availability of GHGRP reported data resulting in methodological and data quality improvements that reduced uncertainty. Previously, MSW landfill emissions estimates were calculated using a model and default factors with higher assumed uncertainty.

Due to the availability of GHGRP reported data, Semiconductor Manufacturing emissions methodology as well as the uncertainty model was revised for the 1990 to 2012 Inventory. The revised model to estimate uncertainty relies on analysis conducted during the development of the EPA's GHGRP Subpart I rulemaking to estimate uncertainty associated with facility-reported emissions. These results were applied to the GHGRP-reported data as well as to the non-reported emissions. An improved methodology to estimate non-reported emissions along with improved methodology to estimate uncertainty of these non-reported emissions led to a reduced overall uncertainty of -6 to 6 percent in the 1990 to 2016 Inventory compared against a range of -8 to 9 percent in the 1990 to 2011 Inventory for the emissions of F-GHGs from the Semiconductor Manufacturing source category.

## 7.4. Planned Improvements

Identifying the sources of uncertainty in the emission and removal estimates of the Inventory and quantifying the magnitude of the associated uncertainty is the crucial first step towards improving those estimates. Quantitative assessment of the parameter uncertainty may also provide information about the relative importance of input parameters (such as activity data and emission factors), based on their relative contribution to the uncertainty within the source or sink category estimates. Such information can be used to prioritize resources with a goal of reducing uncertainty over time within or among inventory source categories and their input parameters. In the current Inventory, potential sources of model uncertainty have been identified for some emission source categories, and uncertainty estimates based on their parameters' uncertainty have been developed for all the emission source categories, with the exception of CH<sub>4</sub> from Incineration of Waste, and the International Bunker Fuels, CO<sub>2</sub> from Wood Biomass and Biofuel Consumption, and Indirect Greenhouse Gas Emissions source categories, which are not included in the energy sector totals. CO<sub>2</sub> Emissions from Wood Biofuel and Ethanol Consumption, however, are accounted for implicitly in the Land Use, Land-Use Change and Forestry (LULUCF) chapter through the calculation of changes in carbon stocks. The Energy sector does provide an estimate of CO<sub>2</sub> emissions from Wood Biomass and Biofuel Consumption, but rather provided as a memo item for informational purposes.

Specific areas that require further research to reduce uncertainties and improve the quality of uncertainty estimates include:

- *Improving conceptualization.* Improving the inclusiveness of the structural assumptions chosen can reduce uncertainties. An example is better treatment of seasonality effects that leads to more accurate annual estimates of emissions or removals for the Agriculture, Forestry and Other Land Use (AFOLU) Sector.
- *Incorporating excluded emission sources.* Quantitative estimates for some of the sources and sinks of greenhouse gas emissions, such as from some land-use activities, industrial processes, and parts of mobile sources, could not be developed at this time either because data are incomplete or because methodologies do not exist for estimating emissions from these source categories. See Annex 5 of this report for a discussion of the sources of greenhouse gas emissions and sinks excluded from this report. In the future, consistent with IPCC good practice principles, efforts will focus on estimating emissions from excluded emission sources and developing uncertainty estimates for all source categories for which emissions are estimated.
- *Improving the accuracy of emission factors.* Further research is needed in some cases to improve the accuracy of emission factors used to calculate emissions from a variety of sources. For example, the accuracy of current emission factors applied to CH<sub>4</sub> and N<sub>2</sub>O emissions from stationary and mobile combustion are highly uncertain, and research is underway to improve these emission factors.
- *Collecting detailed activity data.* Although methodologies exist for estimating emissions for some sources, problems arise in obtaining activity data at a level of detail in which aggregate emission factors can be applied.
- *Improving models:* Improving model structure and parameterization can lead to better understanding and characterization of the systematic and random errors, as well as reductions in these causes of uncertainty.
- *Collecting more measured data and using more precise measurement methods.* Uncertainty associated with bias and random sampling error can be reducing by increasing the sample size and filling in data gaps. Measurement



error can be reduced by using more precise measurement methods, avoiding simplifying assumption, and ensuring that measurement technologies are appropriately used and calibrated.

- *Refine Source and Sink Category and Overall Uncertainty Estimates.* For many individual source categories, further research is needed to more accurately characterize PDFs that surround emissions modeling input variables. This might involve using measured or published statistics or implementing rigorous elicitation protocol to elicit expert judgments, if published or measured data are not available. For example, activity data provided by EPA's GHGRP are used to develop estimates for several source categories—including but not limited to Magnesium Production and Processing, Semiconductor Manufacturing, and Electrical Transmission and Distribution—and could potentially be implemented for additional source categories to improve uncertainty results, where appropriate.
- *Improve characterization of trend uncertainty associated with base year Inventory estimates.* The characterization of base year uncertainty estimates could be improved, by developing explicit uncertainty models for the base year. This would then improve the analysis of trend uncertainty. However, not all of the simplifying assumptions described in the "Trend Uncertainty" section above may be eliminated through this process due to a lack of availability of more appropriate data.
- *Improving state of knowledge and eliminating known risk of bias.* Use expert judgment to improve the understanding of categories and processes leading to emissions and removals. Ensure methodologies, models, and estimation procedures are used appropriately and as advised by 2006 IPCC Guidelines.

## 7.5. Summary Information on Uncertainty Analyses by Source and Sink Category

The quantitative uncertainty estimates associated with each emission and removal category are reported within sectoral chapters of this Inventory following the discussions of inventory estimates and their estimation methodology. This section provides summary descriptions of the uncertainty analyses performed for some of the source and sink categories, including the models and methods used to calculate the emission estimates and the potential sources of uncertainty surrounding them. These source or sink categories are organized below in the same order as the categories in each chapter of the main section of this Inventory. To avoid repetition, the following uncertainty analysis discussions of individual source categories do not include descriptions of these source categories. Hence, to better understand the details provided below, refer to the respective chapters and sections in the main section of this Inventory, as needed. All uncertainty estimates are reported relative to the current Inventory estimates for the 95 percent confidence interval, unless otherwise specified.

### Energy

The uncertainty analysis descriptions in this section correspond to source categories included in the Energy chapter of the Inventory. For additional information on uncertainty for Energy sources, refer to Section 3.2.

#### CO<sub>2</sub> from Fossil Fuel Combustion

For estimates of CO<sub>2</sub> from fossil fuel combustion, the amount of CO<sub>2</sub> emitted is directly related to the amount of fuel consumed, the fraction of the fuel that is oxidized, and the carbon content of the fuel. Therefore, a careful accounting of fossil fuel consumption by fuel type, average carbon contents of fossil fuels consumed, and production of fossil fuel-based products with long-term carbon storage should yield an accurate estimate of CO<sub>2</sub> emissions.

Although statistics of total fossil fuel and other energy consumption are relatively accurate, the allocation of this consumption to individual end-use sectors (i.e., residential, commercial, industrial, and transportation) is less certain. For example, for some fuels the sectoral allocations are based on price rates (i.e., tariffs), but a commercial establishment may be able to negotiate an industrial rate or a small industrial establishment may end up paying an industrial rate, leading to a misallocation of emissions. Also, the deregulation of the natural gas industry and the more recent deregulation of the electric power industry have likely led to some minor problems in collecting accurate energy statistics as firms in these industries have undergone significant restructuring.

For this uncertainty estimation, the inventory estimation model for CO<sub>2</sub> from fossil fuel combustion was integrated with the relevant variables from the inventory estimation model for International Bunker Fuels, to realistically characterize the interaction (or endogenous correlation) between the variables of these two models.

1 In developing the uncertainty estimation model, uniform distributions were assumed for all activity-related input  
2 variables and emission factors, based on the SAIC/EIA (2001) report.<sup>134</sup> Triangular distributions were assigned for the  
3 oxidization factors (or combustion efficiencies). The uncertainty ranges were assigned to the input variables based on the  
4 data reported in SAIC/EIA (2001) and on conversations with various agency personnel.<sup>135</sup>

5 The uncertainty ranges for the activity-related input variables were typically asymmetric around their inventory  
6 estimates; the uncertainty ranges for the emissions factors were symmetric. Bias (or systematic uncertainties) associated  
7 with these variables accounted for much of the uncertainties associated with these variables (SAIC/EIA 2001).<sup>136</sup> For  
8 purposes of this uncertainty analysis, each input variable was simulated 10,000 times through Monte Carlo sampling.

#### 9 **CH<sub>4</sub> and N<sub>2</sub>O from Stationary Combustion**

10 The uncertainty estimation model for this source category was developed by integrating the CH<sub>4</sub> and N<sub>2</sub>O stationary  
11 source inventory estimation models with the model for CO<sub>2</sub> from fossil fuel combustion to realistically characterize the  
12 interaction (or endogenous correlation) between the variables of these three models. About 55 input variables were simulated  
13 for the uncertainty analysis of this source category (about 20 from the CO<sub>2</sub> emissions from fossil fuel combustion inventory  
14 estimation model and about 35 from the stationary source inventory models).

15 In developing the uncertainty estimation model, uniform distribution was assumed for all activity-related input  
16 variables and N<sub>2</sub>O emission factors, based on the SAIC/EIA (2001) report. For these variables, the uncertainty ranges were  
17 assigned to the input variables based on the data reported in SAIC/EIA (2001). However, the CH<sub>4</sub> emission factors differ  
18 from those used by the U.S. Energy Information Administration (EIA). These factors and uncertainty ranges are based on  
19 IPCC default uncertainty estimates (IPCC 2006).

#### 20 **CH<sub>4</sub> and N<sub>2</sub>O from Mobile Combustion**

21 The uncertainty analysis was performed on 2017 estimates of CH<sub>4</sub> and N<sub>2</sub>O emissions, incorporating probability  
22 distribution functions associated with the major input variables. For the purposes of this analysis, the uncertainty was  
23 modeled for the following four major sets of input variables: (1) VMT data, by on-road vehicle and fuel type and (2) emission  
24 factor data, by on-road vehicle, fuel, and control technology type, (3) fuel consumption, data, by non-road vehicle and  
25 equipment type, and (4) emission factor data, by non-road vehicle and equipment type.

#### 26 **Carbon Emitted from Non-Energy Uses of Fossil Fuels**

27 An uncertainty analysis was conducted to quantify the uncertainty surrounding the estimates of emissions and  
28 storage factors from non-energy uses. This analysis, performed using @RISK software and the IPCC-recommended  
29 Approach 2 methodology (Monte Carlo Stochastic Simulation technique), provides for the specification of probability  
30 density functions for key variables within a computational structure that mirrors the calculation of the inventory estimate.  
31 The results presented below provide the 95 percent confidence interval, the range of values within which emissions are likely  
32 to fall, for this source category.

33 The non-energy use analysis is based on U.S.-specific storage factors for (1) feedstock materials (natural gas, LPG,  
34 pentanes plus, naphthas, other oils, still gas, special naphthas, and other industrial coal), (2) asphalt, (3) lubricants, and (4)  
35 waxes. For the remaining fuel types (the “other” category in Table 3-20 and Table 3-21 in the NIR), the storage factors were  
36 taken directly from IPCC (2006), where available, and otherwise assumptions were made based on the potential fate of  
37 carbon in the respective NEU products. To characterize uncertainty, five separate analyses were conducted, corresponding  
38 to each of the five categories. In all cases, statistical analyses or expert judgments of uncertainty were not available directly  
39 from the information sources for all the activity variables; thus, uncertainty estimates were determined using assumptions  
40 based on source category knowledge.

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<sup>134</sup> SAIC/EIA (2001) characterizes the underlying probability density function for the input variables as a combination of uniform and normal distributions (the former to represent the bias component and the latter to represent the random component). However, for purposes of the current uncertainty analysis, it was determined that uniform distribution was more appropriate to characterize the probability density function underlying each of these variables.

<sup>135</sup> In the SAIC/EIA (2001) report, the quantitative uncertainty estimates were developed for each of the three major fossil fuels used within each end-use sector; the variations within the sub-fuel types within each end-use sector were not modeled. However, for purposes of assigning uncertainty estimates to the sub-fuel type categories within each end-use sector in the current uncertainty analysis, SAIC/EIA (2001)-reported uncertainty estimates were extrapolated.

<sup>136</sup> Although, in general, random uncertainties are the main focus of statistical uncertainty analysis, when the uncertainty estimates are elicited from experts, their estimates include both random and systematic uncertainties. Hence, both these types of uncertainties are represented in this uncertainty analysis.

## **Incineration of Waste**

The uncertainties in the waste incineration emission estimates arise from both the assumptions applied to the data and from the quality of the data. Key factors include MSW incineration rate; fraction oxidized; missing data on waste composition; average C content of waste components; assumptions on the synthetic/biogenic C ratio; and combustion conditions affecting N<sub>2</sub>O emissions. The highest levels of uncertainty surround the variables that are based on assumptions (e.g., percent of clothing and footwear composed of synthetic rubber); the lowest levels of uncertainty surround variables that were determined by quantitative measurements (e.g., combustion efficiency, C content of C black).

## **Coal Mining—TO BE UPDATED FOR FINAL INVENTORY REPORT**

A quantitative uncertainty analysis was conducted for the coal mining source category using the IPCC-recommended Approach 2 uncertainty estimation methodology. Because emission estimates from underground ventilation systems were based on actual measurement data from EPA's GHGRP or from MSHA, uncertainty is relatively low.

Estimates of CH<sub>4</sub> recovered by degasification systems are relatively certain for utilized CH<sub>4</sub> because of the availability of EPA's GHGRP data and gas sales information. Many of the recovery estimates use data on wells within 100 feet of a mined area. However, uncertainty exists concerning the radius of influence of each well. The number of wells counted, and thus the avoided emissions, may vary if the drainage area is found to be larger or smaller than estimated.

In 2015 and 2016, a small level of uncertainty was introduced with using estimated rather than measured values of recovered methane from two of the mines with degasification systems. An increased level of uncertainty was applied to these two subsources, but the change had little impact on the overall uncertainty.

Surface mining and post-mining emissions are associated with considerably more uncertainty than underground mines, because of the difficulty in developing accurate emission factors from field measurements. However, since underground emissions constitute the majority of total coal mining emissions, the uncertainty associated with underground emissions is the primary factor that determines overall uncertainty.

## **Abandoned Underground Coal Mines—TO BE UPDATED FOR FINAL INVENTORY REPORT**

A quantitative uncertainty analysis was conducted to estimate the uncertainty surrounding the estimates of emissions from abandoned underground coal mines. The uncertainty analysis described below provides for the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the inventory estimate. The results provide the range within which, with 95 percent certainty, emissions from this source category are likely to fall.

A quantitative uncertainty analysis was conducted to estimate the uncertainty surrounding the estimates of emissions from abandoned underground coal mines using probability density functions for key variables within a computational structure that mirrors the calculation of the inventory estimate. The results provide the range within which, with 95 percent certainty, emissions from this source category are likely to fall.

As discussed above, the low, mid and high model generated decline curves for each basin were fitted to a hyperbolic decline curve. The decline curve parameters,  $D_i$  and  $b$ , for the low, mid and high decline curves were then used to define a triangular distribution and together with the initial rate value of a mine's emissions and time from abandonment, a probability density function for each mine in the coal basin was generated.

## **Petroleum Systems—TO BE UPDATED FOR FINAL INVENTORY REPORT**

In recent years, EPA has made significant revisions to the Inventory methodology to use updated activity and emissions data. To update its characterization of uncertainty, EPA has conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo Simulation technique). For more information, please see the 2018 Uncertainty Memo. EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around methane emissions from petroleum systems for the current Inventory, then applied the calculated bounds to both CH<sub>4</sub> and CO<sub>2</sub> emissions estimates. For the analysis, EPA focused on the five highest methane-emitting sources for the year 2016, which together emitted 78 percent of methane from petroleum systems in 2016, and extrapolated the estimated uncertainty for the remaining sources. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." As a result, the understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve. The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification.

## **Natural Gas Systems—TO BE UPDATED FOR FINAL INVENTORY REPORT**

In recent years, EPA has made significant revisions to the Inventory methodology to use updated activity and emissions data. To update its characterization of uncertainty, EPA has conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo Simulation technique). For more information, please see the 2018 Uncertainty Memo. EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around CH<sub>4</sub> emissions from natural gas systems for the current Inventory, then applied the calculated bounds to both CH<sub>4</sub> and CO<sub>2</sub> emissions estimates. For the analysis, EPA focused on the 16 highest-emitting sources for the year 2016, which together emitted 78 percent of methane from natural gas systems in 2016, and extrapolated the estimated uncertainty for the remaining sources. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification. The understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve.

## **Abandoned Oil and Gas Wells**

To characterize uncertainty surrounding estimates of abandoned well emissions, EPA conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo simulation technique) for year 2016 for total abandoned oil and gas well CH<sub>4</sub> emissions in the previous Inventory, and has applied the calculated uncertainty ranges to the 2017 estimates. See the *2018 Abandoned Wells Memo*<sup>137</sup> for details of the uncertainty analysis methods. EPA used measurement data from the Kang et al. (2016) and Townsend-Small et al. (2016) studies to characterize the CH<sub>4</sub> emission factor PDFs. For activity data inputs (e.g., total count of abandoned wells, split between plugged and unplugged), EPA assigned default uncertainty bounds of +/- 10 percent based on expert judgment.

## **Energy Sources of Precursor Greenhouse Gas Emissions**

Uncertainties in these estimates are partly due to the accuracy of the emission factors used and accurate estimates of activity data. A quantitative uncertainty analysis was not performed.

## **International Bunker Fuels**

Emission estimates related to the consumption of international bunker fuels are subject to the same uncertainties as those from domestic aviation and marine mobile combustion emissions; however, additional uncertainties result from the difficulty in collecting accurate fuel consumption activity data for international transport activities separate from domestic transport activities. Uncertainties exist with regard to the total fuel used by military aircraft and ships, and in the activity data on military operations and training that were used to estimate percentages of total fuel use reported as bunker fuel emissions. There are uncertainties in aircraft operations and training activity data. There is uncertainty associated with ground fuel estimates for 1997 through 2001. Small fuel quantities may have been used in vehicles or equipment other than that which was assumed for each fuel type. There are also uncertainties in fuel end-uses by fuel type, emissions factors, fuel densities, diesel fuel sulfur content, aircraft and vessel engine characteristics and fuel efficiencies, and the methodology used to back-calculate the data set to 1990 using the original set from 1995.

There is also concern regarding the reliability of the existing DOC (1991 through 2018) data on marine vessel fuel consumption reported at U.S. customs stations due to the significant degree of inter-annual variation.

## **Wood Biomass and Biofuel Consumption**

It is assumed that the combustion efficiency for woody biomass is 100 percent, which is believed to be an overestimate of the efficiency of wood combustion processes in the United States. Decreasing the combustion efficiency would decrease emission estimates for CO<sub>2</sub>. Additionally, the heat content applied to the consumption of woody biomass in the residential, commercial, and electric power sectors is unlikely to be a completely accurate representation of the heat content for all the different types of woody biomass consumed within these sectors. Emission estimates from ethanol and biodiesel production are more certain than estimates from woody biomass consumption due to better activity data collection methods and uniform combustion techniques.

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<sup>137</sup> See <[https://www.epa.gov/sites/production/files/2018-04/documents/ghgemissions\\_abandoned\\_wells.pdf](https://www.epa.gov/sites/production/files/2018-04/documents/ghgemissions_abandoned_wells.pdf)>

## Industrial Processes and Product Use

The uncertainty analysis descriptions in this section correspond to source categories included in the Industrial Processes and Product Use chapter of the Inventory.

### Cement Production

The uncertainties contained in these estimates are primarily due to uncertainties in the lime content of clinker and in the percentage of CKD recycled inside the cement kiln. Uncertainty is also associated with the assumption that all calcium-containing raw materials are  $\text{CaCO}_3$ , when a small percentage likely consists of other carbonate and non-carbonate raw materials.

### Lime Production

The uncertainties contained in these estimates can be attributed to slight differences in the chemical composition of lime products and  $\text{CO}_2$  recovery rates for on-site process use over the time series. Although the methodology accounts for various formulations of lime, it does not account for the trace impurities found in lime, such as iron oxide, alumina, and silica. In addition, a portion of the  $\text{CO}_2$  emitted during lime production will actually be reabsorbed when the lime is consumed, especially at captive lime production facilities. Another uncertainty is the assumption that calcination emissions for LKD are around 2 percent. Publicly available on LKD generation rates, total quantities not used in cement production, and types of other byproducts/wastes produced at lime facilities is limited.

### Glass Production

The uncertainty levels presented in this section arise in part due to variations in the chemical composition of limestone used in glass production. In addition to calcium carbonate, limestone may contain smaller amounts of magnesia, silica, and sulfur, among other minerals (potassium carbonate, strontium carbonate and barium carbonate, and dead burned dolomite). Similarly, the quality of the limestone (and mix of carbonates) used for glass manufacturing will depend on the type of glass being manufactured.

The estimates below also account for uncertainty associated with activity data. Large fluctuations in reported consumption exist, reflecting year-to-year changes in the number of survey responders. The uncertainty resulting from a shifting survey population is exacerbated by the gaps in the time series of reports. The accuracy of distribution by end use is also uncertain because this value is reported by the manufacturer of the input carbonates (limestone, dolomite and soda ash) and not the end user.

There is a high uncertainty associated with this estimate, as dolomite is a major raw material consumed in glass production. Additionally, there is significant inherent uncertainty associated with estimating withheld data points for specific end uses of limestone and dolomite. The uncertainty of the estimates for limestone and dolomite used in glass making is especially high. Lastly, much of the limestone consumed in the United States is reported as “other unspecified uses;” therefore, it is difficult to accurately allocate this unspecified quantity to the correct end-uses.

### Other Process Uses of Carbonates

The uncertainty levels presented in this section account for uncertainty associated with activity data. Data on limestone and dolomite consumption are collected by USGS through voluntary national surveys. The uncertainty resulting from a shifting survey population is exacerbated by the gaps in the time series of reports. The accuracy of distribution by end use is also uncertain because this value is reported by the producer/mines and not the end user. Additionally, there is significant inherent uncertainty associated with estimating withheld data points for specific end uses of limestone and dolomite. Lastly, much of the limestone consumed in the United States is reported as “other unspecified uses;” therefore, it is difficult to accurately allocate this unspecified quantity to the correct end-uses.

Uncertainty in the estimates also arises in part due to variations in the chemical composition of limestone. In addition to calcium carbonate, limestone may contain smaller amounts of magnesia, silica, and sulfur, among other minerals. The exact specifications for limestone or dolomite used as flux stone vary with the pyrometallurgical process and the kind of ore processed.

For emissions from soda ash consumption, the primary source of uncertainty, results from the fact that these emissions are dependent upon the type of processing employed by each end-use. Specific emission factors for each end-use are not available, so a Tier 1 default emission factor is used for all end uses.

### Ammonia Production

The uncertainties presented in this section are primarily due to how accurately the emission factor used represents an average across all ammonia plants using natural gas feedstock. Uncertainties are also associated with ammonia production estimates and the assumption that all ammonia production and subsequent urea production was from the same process—conventional catalytic reforming of natural gas feedstock, with the exception of one ammonia production plant located in

Kansas that is manufacturing ammonia from petroleum coke feedstock. Uncertainty is also associated with the representativeness of the emission factor used for the petroleum coke-based ammonia process. It is also assumed that ammonia and urea are produced at collocated plants from the same natural gas raw material. The uncertainty of the total urea production activity data, based on USGS Minerals Yearbook: Nitrogen data, is a function of the reliability of reported production data and is influenced by the completeness of the survey responses. In addition, due to the fact that 2017 nitrogen data has yet to be published, 2016 is used as a proxy which may result in greater uncertainty.

### **Urea Consumption for Non-Agricultural Purposes**

The primary uncertainties associated with this source category are associated with the accuracy of these estimates as well as the fact that each estimate is obtained from a different data source. Because urea production estimates are no longer available from the USGS, there is additional uncertainty associated with urea produced beginning in 2011. There is also uncertainty associated with the assumption that all of the carbon in urea is released into the environment as CO<sub>2</sub> during use.

### **Nitric Acid Production**

Uncertainty associated with the parameters used to estimate N<sub>2</sub>O emissions includes the share of U.S. nitric acid production attributable to each emission abatement technology over the time series (especially prior to 2010), and the associated emission factors applied to each abatement technology type.

### **Adipic Acid Production**

Uncertainty associated with N<sub>2</sub>O emission estimates includes the methods used by companies to monitor and estimate emissions. While some information has been obtained through outreach with facilities, limited information is available over the time series on these methods, abatement technology destruction and removal efficiency rates and plant specific production levels.

### **Caprolactam, Glyoxal and Glyoxylic Acid Production**

Estimation of emissions of N<sub>2</sub>O from caprolactam production can be treated as analogous to estimation of emissions of N<sub>2</sub>O from nitric acid production. Both production processes involve an initial step of NH<sub>3</sub> oxidation which is the source of N<sub>2</sub>O formation and emissions (IPCC 2006). Therefore, uncertainties for the default values in the *2006 IPCC Guidelines* is an estimate based on default values for nitric acid plants. In general, default emission factors for gaseous substances have higher uncertainties because mass values for gaseous substances are influenced by temperature and pressure variations and gases are more easily lost through process leaks. The default values for caprolactam production have a relatively high level of uncertainty due to the limited information available (IPCC 2006).

### **Silicon Carbide Production and Consumption**

There is uncertainty associated with the emission factors used because they are based on stoichiometry as opposed to monitoring of actual SiC production plants. For CH<sub>4</sub>, there is also uncertainty associated with the hydrogen-containing volatile compounds in the petroleum coke (IPCC 2006). There is also uncertainty associated with the use or destruction of methane generated from the process in addition to uncertainty associated with levels of production, net imports, consumption levels, and the percent of total consumption that is attributed to metallurgical and other non-abrasive uses.

### **Titanium Dioxide Production**

Each year, the U.S. Geological Survey (USGS) collects titanium industry data for titanium mineral and pigment production operations. If TiO<sub>2</sub> pigment plants do not respond, production from the operations is estimated based on prior year production levels and industry trends. Variability in response rates varies from 67 to 100 percent of TiO<sub>2</sub> pigment plants over the time series.

Although some TiO<sub>2</sub> may be produced using graphite or other carbon inputs, information and data regarding these practices were not available. Titanium dioxide produced using graphite inputs, for example, may generate differing amounts of CO<sub>2</sub> per unit of TiO<sub>2</sub> produced as compared to that generated using petroleum coke in production. While the most accurate method to estimate emissions would be to base calculations on the amount of reducing agent used in each process rather than on the amount of TiO<sub>2</sub> produced, sufficient data were not available to do so.

### **Soda Ash Production**

Emission estimates from soda ash production have relatively low associated uncertainty levels in that reliable and accurate data sources are available for the emission factor and activity data for trona-based soda ash production. Soda ash production data was collected by the USGS from voluntary surveys. One source of uncertainty is the purity of the trona ore used for manufacturing soda ash. The emission factor used for this estimate assumes the ore is 100 percent pure, and likely overestimates the emissions from soda ash manufacture.

## **Petrochemical Production**

The CH<sub>4</sub> and CO<sub>2</sub> emission factors used for acrylonitrile and methanol production are based on a limited number of studies. Using plant-specific factors instead of default or average factors could increase the accuracy of the emission estimates; however, such data were not available for the current Inventory report. There is some uncertainty in the applicability of the average emission factors for each petrochemical type across all prior years. While petrochemical production processes in the United States have not changed significantly since 1990, some operational efficiencies have been implemented at facilities over the time series.

## **HCFC-22 Production**

The uncertainty analysis presented in this section was based on a plant-level Monte Carlo Stochastic Simulation for 2006. A normal probability density function was assumed for all measurements and biases except the equipment leak estimates for one plant; a log-normal probability density function was used for this plant's equipment leak estimates. The simulation for 2006 yielded a 95-percent confidence interval for U.S. emissions of 6.8 percent below to 9.6 percent above the reported total.

The relative errors yielded by the Monte Carlo Stochastic Simulation for 2006 were applied to the U.S. emission estimate for 2017. The resulting estimates of absolute uncertainty are likely to be reasonably accurate because (1) the methods used by the two remaining plants to estimate their emissions are not believed to have changed significantly since 2006, and (2) although the distribution of emissions among the plants has changed between 2006 and 2017 (because one plant has closed), the plant that currently accounts for most emissions had a relative uncertainty in its 2006 (as well as 2005) emissions estimate that was similar to the relative uncertainty for total U.S. emissions. Thus, the closure of one plant is not likely to have a large impact on the uncertainty of the national emission estimate.

**Carbon Dioxide Consumption** There is uncertainty associated with the data reported through EPA's GHGRP. Specifically, there is uncertainty associated with the amount of CO<sub>2</sub> consumed for food and beverage applications given a threshold for reporting under GHGRP applicable to those reporting under Subpart PP, in addition to the exclusion of the amount of CO<sub>2</sub> transferred to all other end-use categories. Second, uncertainty is associated with the exclusion of imports/exports data for CO<sub>2</sub> suppliers.

## **Phosphoric Acid Production**

Regional production for 2017 was estimated based on regional production data from previous years and multiplied by regionally-specific emission factors. There is uncertainty associated with the degree to which the estimated 2017 regional production data represents actual production in those regions. Total U.S. phosphate rock production data are not considered to be a significant source of uncertainty because all the domestic phosphate rock producers report their annual production to the USGS.

An additional source of uncertainty in the calculation of CO<sub>2</sub> emissions from phosphoric acid production is the carbonate composition of phosphate rock; the composition of phosphate rock varies depending upon where the material is mined, and may also vary over time. Another source of uncertainty is the disposition of the organic carbon content of the phosphate rock. A third source of uncertainty is the assumption that all domestically-produced phosphate rock is used in phosphoric acid production and used without first being calcined.

## **Iron and Steel Production and Metallurgical Coke Production**

Uncertainty is associated with the total U.S. coking coal consumption, total U.S. coke production and materials consumed during this process. Therefore, for the purpose of this analysis, uncertainty parameters are applied to primary data inputs to the calculation (i.e., coking coal consumption and metallurgical coke production) only.

There is uncertainty associated with the assumption that all coal used for purposes other than coking coal is for direct injection coal. There is also uncertainty associated with the C contents for pellets, sinter, and natural ore, which are assumed to equal the C contents of direct reduced iron, when consumed in the blast furnace. There is uncertainty associated with the consumption of natural ore under current industry practices. For EAF steel production, there is uncertainty associated with the amount of EAF anode and charge carbon consumed due to inconsistent data throughout the time series. Also for EAF steel production, there is uncertainty associated with the assumption that 100 percent of the natural gas attributed to "steelmaking furnaces" by AISI is process-related and nothing is combusted for energy purposes. Uncertainty is also associated with the use of process gases such as blast furnace gas and coke oven gas.

## **Ferroalloy Production**

Annual ferroalloy production was reported by the USGS in three broad categories until the 2010 publication: ferroalloys containing 25 to 55 percent silicon (including miscellaneous alloys), ferroalloys containing 56 to 95 percent silicon, and silicon metal (through 2005 only, 2005 value used as proxy for 2005 through 2010). Starting with the 2011 Minerals Yearbook, USGS started reporting all the ferroalloy production under a single category: total silicon materials

production. The total silicon materials quantity was allocated across the three categories based on the 2010 production shares for the three categories. Refer to the Methodology section for further details. Additionally, production data for silvery pig iron (alloys containing less than 25 percent silicon) are not reported by the USGS to avoid disclosing proprietary company data. Emissions from this production category, therefore, were not estimated.

Also, some ferroalloys may be produced using wood or other biomass as a primary or secondary carbon source (carbonaceous reductants), however information and data regarding these practices were not available. Emissions from ferroalloys produced with wood or other biomass would not be counted under this source because wood-based carbon is of biogenic origin.<sup>138</sup> Even though emissions from ferroalloys produced with coking coal or graphite inputs would be counted in national trends, they may be generated with varying amounts of CO<sub>2</sub> per unit of ferroalloy produced. The most accurate method for these estimates would be to base calculations on the amount of reducing agent used in the process, rather than the amount of ferroalloys produced. These data, however, were not available, and are also often considered confidential business information.

### Aluminum Production

Uncertainty was assigned to the CO<sub>2</sub>, CF<sub>4</sub>, and C<sub>2</sub>F<sub>6</sub> emission values reported by each individual facility to EPA's GHGRP. Uncertainty surrounding the reported CO<sub>2</sub>, CF<sub>4</sub>, and C<sub>2</sub>F<sub>6</sub> emission values were determined to have a normal distribution with uncertainty ranges of ±6, ±16, and ±20 percent, respectively.

### Magnesium Production- TO BE UPDATED FOR FINAL INVENTORY REPORT

Uncertainty surrounding the total estimated emissions in 2016 is attributed to the uncertainties around SF<sub>6</sub>, HFC-134a, and CO<sub>2</sub> emission estimates. To estimate the uncertainty surrounding the estimated 2016 SF<sub>6</sub> emissions from magnesium production and processing, the uncertainties associated with three variables were estimated: (1) emissions reported by magnesium producers and processors for 2016 through EPA's GHGRP, (2) emissions estimated for magnesium producers and processors that reported via the Partnership in prior years but did not report 2016 emissions through EPA's GHGRP, and (3) emissions estimated for magnesium producers and processors that did not participate in the Partnership or report through EPA's GHGRP. Additional uncertainties exist in these estimates that are not addressed in this methodology, such as the basic assumption that SF<sub>6</sub> neither reacts nor decomposes during use.

### Lead Production

Uncertainty associated with lead production relates to the emission factors and activity data used. The direct smelting emission factor used in primary production is taken from Sjardin (2003) who averaged the values provided by three other studies (Dutrizac et al. 2000; Morris et al. 1983; Ullman 1997). For secondary production, Sjardin (2003) added a CO<sub>2</sub> emission factor associated with battery treatment. The applicability of these emission factors to plants in the United States is uncertain. There is also a smaller level of uncertainty associated with the accuracy of primary and secondary production data provided by the USGS which is collected via voluntary surveys; the uncertainty of the activity data is a function of the reliability of reported plant-level production data and the completeness of the survey response.

### Zinc Production

The uncertainty associated with these estimates is two-fold, relating to activity data and emission factors used. First, there is uncertainty associated with the amount of EAF dust consumed in the United States to produce secondary zinc using emission-intensive Waelz kilns. Second, there is uncertainty associated with the emission factors used to estimate CO<sub>2</sub> emissions from secondary zinc production processes.

### Semiconductor Manufacturing

The equation used to estimate uncertainty is:

Total Emissions (E<sub>T</sub>) = GHGRP Reported F-GHG Emissions (E<sub>R,F-GHG</sub>) + Non-Reporters' Estimated F-GHG Emissions (E<sub>NR,F-GHG</sub>) + GHGRP Reported N<sub>2</sub>O Emissions (E<sub>R,N<sub>2</sub>O</sub>) + Non-Reporters' Estimated N<sub>2</sub>O Emissions (E<sub>NR,N<sub>2</sub>O</sub>)

where E<sub>R</sub> and E<sub>NR</sub> denote totals for the indicated subcategories of emissions for F-GHG and N<sub>2</sub>O, respectively.

The uncertainty in E<sub>T</sub> presented in Table 4-98 of the Inventory results from the convolution of four distributions of emissions, each reflecting separate estimates of possible values of E<sub>R,F-GHG</sub>, E<sub>R,N<sub>2</sub>O</sub>, E<sub>NR,F-GHG</sub>, and E<sub>NR,N<sub>2</sub>O</sub>. The approach and methods for estimating each distribution and combining them to arrive at the reported 95 percent confidence interval (CI) are described in the remainder of this section.

The uncertainty estimate of E<sub>R,F-GHG</sub>, or GHGRP-reported F-GHG emissions, is developed based on gas-specific uncertainty estimates of emissions for two industry segments, one processing 200 mm wafers and one processing 300 mm

<sup>138</sup> Emissions and sinks of biogenic carbon are accounted for in the Land Use, Land-Use Change, and Forestry chapter.



1 wafers. Uncertainties in emissions for each gas and industry segment were developed during the assessment of emission  
2 estimation methods for the subpart I GHGRP rulemaking in 2012 (see *Technical Support for Modifications to the*  
3 *Fluorinated Greenhouse Gas Emission Estimation Method Option for Semiconductor Facilities under Subpart I*, docket  
4 EPA-HQ-OAR-2011-0028).<sup>139</sup> The 2012 analysis did not take into account the use of abatement. For the industry segment  
5 that processed 200 mm wafers, estimates of uncertainties at a 95 percent CI ranged from  $\pm 29$  percent for  $C_3F_8$  to  $\pm 10$  percent  
6 for  $CF_4$ . For the corresponding 300 mm industry segment, estimates of the 95 percent CI ranged from  $\pm 36$  percent for  $C_4F_8$   
7 to  $\pm 16$  percent for  $CF_4$ . These gas and wafer-specific uncertainty estimates are applied to the total emissions of the facilities  
8 that did not abate emissions as reported under EPA's GHGRP.

9 For those facilities reporting abatement of emissions under EPA's GHGRP, estimates of uncertainties for the no  
10 abatement industry segments are modified to reflect the use of full abatement (abatement of *all* gases from *all* cleaning and  
11 etching equipment) and partial abatement. These assumptions used to develop uncertainties for the partial and full abatement  
12 facilities are identical for 200 mm and 300 mm wafer processing facilities. For all facilities reporting gas abatement, a  
13 triangular distribution of destruction or removal efficiency is assumed for each gas. The triangular distributions range from  
14 an asymmetric and highly uncertain distribution of zero percent minimum to 90 percent maximum with 70 percent most  
15 likely value for  $CF_4$  to a symmetric and less uncertain distribution of 85 percent minimum to 95 percent maximum with 90  
16 percent most likely value for  $C_4F_8$ ,  $NF_3$ , and  $SF_6$ . For facilities reporting partial abatement, the distribution of fraction of the  
17 gas fed through the abatement device, for each gas, is assumed to be triangularly distributed as well. It is assumed that no  
18 more than 50 percent of the gases are abated (i.e., the maximum value) and that 50 percent is the most likely value and the  
19 minimum is zero percent. Consideration of abatement then resulted in four additional industry segments, two 200-mm wafer-  
20 processing segments (one fully and one partially abating each gas) and two 300-mm wafer-processing segment (one fully  
21 and the other partially abating each gas). Gas-specific emission uncertainties were estimated by convolving the distributions  
22 of unabated emissions with the appropriate distribution of abatement efficiency for fully and partially abated facilities using  
23 a Montel Carlo simulation.

24 The uncertainty in  $E_{R,F,GHG}$  is obtained by allocating the estimates of uncertainties to the total GHGRP-reported  
25 emissions from each of the six industry segments, and then running a Monte Carlo simulation which results in the 95 percent  
26 CI for emissions from GHGRP reporting facilities ( $E_{R,F,GHG}$ ).

27 The uncertainty in  $E_{R,N_2O}$  is obtained by assuming that the uncertainty in the emissions reported by each of the  
28 GHGRP reporting facilities results from the uncertainty in quantity of  $N_2O$  consumed and the  $N_2O$  emission factor (or  
29 utilization). Similar to analyses completed for subpart I (see *Technical Support for Modifications to the Fluorinated*  
30 *Greenhouse Gas Emission Estimation Method Option for Semiconductor Facilities under Subpart I*, docket EPA-HQ-OAR-  
31 2011-0028), the uncertainty of  $N_2O$  consumed was assumed to be 20 percent. Consumption of  $N_2O$  for GHGRP reporting  
32 facilities was estimated by back-calculating from emissions reported and assuming no abatement. The quantity of  $N_2O$   
33 utilized (the complement of the emission factor) was assumed to have a triangular distribution with a minimum value of  
34 zero percent, mode of 20 percent and maximum value of 84 percent. The minimum was selected based on physical  
35 limitations, the mode was set equivalent to the subpart I default  $N_2O$  utilization rate for chemical vapor deposition, and the  
36 maximum was set equal to the maximum utilization rate found in ISMI Analysis of Nitrous Oxide Survey Data (ISMI, 2009).  
37 The inputs were used to simulate emissions for each of the GHGRP reporting,  $N_2O$ -emitting facilities. The uncertainty for  
38 the total reported  $N_2O$  emissions was then estimated by combining the uncertainties of each of the facilities reported  
39 emissions using Monte Carlo simulation.

## 40 **Substitution of Ozone Depleting Substances- TO BE UPDATED FOR FINAL INVENTORY** 41 **REPORT**

42 Given that emissions of ODS substitutes occur from thousands of different kinds of equipment and from millions  
43 of point and mobile sources throughout the United States, emission estimates must be made using analytical tools such as  
44 the Vintaging Model or the methods outlined in IPCC (2006). Though the model is more comprehensive than the IPCC

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<sup>139</sup> On November 13, 2013, EPA published a final rule revising subpart I (Electronics Manufacturing) of the GHGRP (78 FR 68162). The revised rule includes updated default emission factors and updated default destruction and removal efficiencies that are slightly different from those that semiconductor manufacturers were required to use to report their 2012 emissions. The uncertainty analyses that were performed during the development of the revised rule focused on these updated defaults, but are expected to be reasonably representative of the uncertainties associated with the older defaults, particularly for estimates at the country level. (They may somewhat underestimate the uncertainties associated with the older defaults at the facility level.) For simplicity, the 2012 estimates are assumed to be unbiased although in some cases, the updated (and therefore more representative) defaults are higher or lower than the older defaults. Multiple models and sensitivity scenarios were run for the subpart I analysis. The uncertainty analysis presented here made use of the Input gas and wafer size model (Model 1) under the following conditions: Year = 2010, f = 20, n = SIA3.

default methodology, significant uncertainties still exist with regard to the levels of equipment sales, equipment characteristics, and end-use emissions profiles that were used to estimate annual emissions for the various compounds.

The uncertainty analysis quantifies the level of uncertainty associated with the aggregate emissions across the 67 end-uses in the Vintaging Model. In order to calculate uncertainty, functional forms were developed to simplify some of the complex “vintaging” aspects of some end-use sectors, especially with respect to refrigeration and air-conditioning, and to a lesser degree, fire extinguishing. These sectors calculate emissions based on the entire lifetime of equipment, not just equipment put into commission in the current year, thereby necessitating simplifying equations. The functional forms used variables that included growth rates, emission factors, transition from ODSs, change in charge size as a result of the transition, disposal quantities, disposal emission rates, and either stock for the current year or original ODS consumption. Uncertainty was estimated around each variable within the functional forms based on expert judgment, and a Monte Carlo analysis was performed. The most significant sources of uncertainty for this source category include the emission factors for residential unitary air-conditioners, as well as the percent of non-MDI aerosol propellant that is HFC-152a.

### **Electrical Transmission and Distribution**

To estimate the uncertainty associated with emissions of SF<sub>6</sub> from Electrical Transmission and Distribution, uncertainties associated with four quantities were estimated: (1) emissions from Partners, (2) emissions from GHGRP-Only Reporters, (3) emissions from Non-Reporters, and (4) emissions from manufacturers of electrical equipment.

### **Nitrous Oxide from Product Uses**

The overall uncertainty associated with the 2017 N<sub>2</sub>O emission estimate from N<sub>2</sub>O product usage was calculated using the *2006 IPCC Guidelines* (2006) Approach 2 methodology. Uncertainty associated with the parameters used to estimate N<sub>2</sub>O emissions include production data, total market share of each end use, and the emission factors applied to each end use, respectively.

## **Agriculture**

The uncertainty analysis descriptions in this section correspond to some source categories included in the Agriculture chapter of the Inventory.

### **Enteric Fermentation**

A quantitative uncertainty analysis for this source category was performed using the IPCC-recommended Approach 2 uncertainty estimation methodology based on a Monte Carlo Stochastic Simulation technique as described in ICF (2003). These uncertainty estimates were developed for the 1990 through 2001 Inventory (i.e., 2003 submission to the UNFCCC). There have been no significant changes to the methodology since that time; consequently, these uncertainty estimates were directly applied to the 2017 emission estimates in this Inventory.

A total of 185 primary input variables (177 for cattle and 8 for non-cattle) were identified as key input variables for the uncertainty analysis. A normal distribution was assumed for almost all activity- and emission factor-related input variables. Triangular distributions were assigned to three input variables (specifically, cow-birth ratios for the three most recent years included in the 2001 model run) to ensure only positive values would be simulated.

### **Manure Management**

An analysis (ERG 2003) was conducted for the manure management emission estimates presented in the 1990 through 2001 Inventory (i.e., 2003 submission to the UNFCCC) to determine the uncertainty associated with estimating CH<sub>4</sub> and N<sub>2</sub>O emissions from livestock manure management. These uncertainty estimates were directly applied to the 2017 emission estimates as there have not been significant changes in the methodology since that time.

### **Rice Cultivation**

Sources of uncertainty in the Tier 3 method include management practices, uncertainties in model structure (i.e., algorithms and parameterization), and variance associated with the NRI sample. Sources of uncertainty in the IPCC (2006) Tier 1 method include the emission factors, management practices, and variance associated with the NRI sample. A Monte Carlo analysis was used to propagate uncertainties in the Tier 1 and 3 methods. The uncertainties from the Tier 1 and 3 approaches are combined to produce the final CH<sub>4</sub> emissions estimate using simple error propagation (IPCC 2006).

### **Agricultural Soil Management**

Uncertainty is estimated for each of the following five components of N<sub>2</sub>O emissions from agricultural soil management: (1) direct emissions simulated by DAYCENT; (2) the components of indirect emissions (N volatilized and leached or runoff) simulated by DAYCENT; (3) direct emissions calculated with the IPCC (2006) Tier 1 method; (4) the components of indirect emissions (N volatilized and leached or runoff) calculated with the IPCC (2006) Tier 1 method; and (5) indirect emissions estimated with the IPCC (2006) Tier 1 method.

## 1            **Liming**

2            Uncertainty regarding the amount of limestone and dolomite applied to soils was estimated at  $\pm 15$  percent with  
3 normal densities (Tepordei 2003; Willett 2013b). Analysis of the uncertainty associated with the emission factors included  
4 the fraction of lime dissolved by nitric acid versus the fraction that reacts with carbonic acid, and the portion of bicarbonate  
5 that leaches through the soil and is transported to the ocean. The probability distribution functions for the fraction of lime  
6 dissolved by nitric acid and the portion of bicarbonate that leaches through the soil were represented as triangular  
7 distributions between ranges of zero and 100 percent of the estimates.

## 8            **Urea Fertilization**

9            The largest source of uncertainty was the default emission factor, which assumes that 100 percent of the C in  
10  $\text{CO}(\text{NH}_2)_2$  applied to soils is ultimately emitted into the environment as  $\text{CO}_2$ . In addition, urea consumption data also have  
11 uncertainty that is propagated through the emission calculation using a Monte Carlo simulation approach as described by  
12 the IPCC (2006).

## 13           **Field Burning of Agricultural Residues**

14           Emissions are estimated using a linear regression model with autoregressive moving-average (ARMA) errors for  
15 2017. Due to data limitations, there are additional uncertainties in agricultural residue burning, particularly the omission of  
16 burning associated with Kentucky bluegrass and “other crop” residues.

## 17           **Land Use, Land-Use Change, and Forestry**

18           The uncertainty analysis descriptions in this section correspond to source categories included in the Land Use,  
19 Land-Use Change, and Forestry chapter of the Inventory.

### 20           **Forest Land Remaining Forest Land**

21           The uncertainty analysis descriptions in this section correspond to source categories included in the *Forest Land*  
22 *Remaining Forest Land* sub-chapter of Land Use, Land-Use Change, and Forestry chapter of the Inventory.

### 23           **Changes in Forest Carbon Stocks**

24           A quantitative uncertainty analysis placed bounds on current flux for forest ecosystems through a  
25 combination of sample-based and model-based approaches to uncertainty for forest ecosystem  $\text{CO}_2$  flux (IPCC  
26 Approach 1).

### 27           **Non- $\text{CO}_2$ Emissions from Forest Fires**

28           In order to quantify the uncertainties for non- $\text{CO}_2$  emissions from wildfires and prescribed burns, a Monte  
29 Carlo (IPCC Approach 2) sampling approach was employed to propagate uncertainty based on the model and data  
30 applied for U.S. forest land. See IPCC (2006) and Annex 3.13 for the quantities and assumptions employed to  
31 define and propagate uncertainty.

### 32           **$\text{N}_2\text{O}$ Emissions from N Additions to Forest Soils**

33           The amount of  $\text{N}_2\text{O}$  emitted from forests depends not only on N inputs and fertilized area, but also on a  
34 large number of variables, including organic C availability, oxygen gas partial pressure, soil moisture content, pH,  
35 temperature, and tree planting/harvesting cycles. The effect of the combined interaction of these variables on  $\text{N}_2\text{O}$   
36 flux is complex and highly uncertain.

37           Uncertainties exist in the fertilization rates, annual area of forest lands receiving fertilizer, and the  
38 emission factors. The uncertainty ranges around the 2004 activity data and emission factor input variables are  
39 directly applied to the 2017 emission estimates. IPCC (2006) provided estimates for the uncertainty associated  
40 with direct and indirect  $\text{N}_2\text{O}$  emission factor for synthetic N fertilizer application to soils.

### 41           **Drained Organic Soils**

42           Uncertainties are based on the sampling error associated with forest area and the uncertainties provided  
43 in the Chapter 2 (IPCC 2013) emissions factors.

### 44           **Land Converted to Forest Land**

45           Uncertainty estimates for forest pool C stock changes were developed using the same methodologies as described  
46 in the Forest Land Remaining Forest Land section for aboveground and belowground biomass, dead wood, and litter. The  
47 exception was when IPCC default estimates were used for reference C stocks in certain conversion categories (i.e., Cropland  
48 Converted to Forest Land and Grassland Converted to Forest Land). In those cases, the uncertainties associated with the  
49 IPCC (2006) defaults were included in the uncertainty calculations.

## **Cropland Remaining Cropland**

The uncertainty analysis descriptions in this section correspond to source categories included in the *Cropland Remaining Cropland* sub-chapter of Land Use, Land-Use Change, and Forestry chapter of the Inventory.

### **Mineral and Organic Soil Carbon Stock Change**

*Uncertainty* is associated with lack of reporting of agricultural woody biomass and dead organic matter C stock changes. The IPCC (2006) does not recommend reporting of annual crop biomass in *Cropland Remaining Cropland* because all of the biomass senesces each year and so there is no long-term storage of C in this pool. For woody plants, biomass C stock changes are likely minor in perennial crops, such as orchards and nut plantations. There will be some removal and replanting of tree crops each year, but the net effect on biomass C stock changes is probably minor because the overall area and tree density is relatively constant across time series. In contrast, agroforestry practices, such as shelterbelts, riparian forests and intercropping with trees, may be significantly changing biomass C stocks over the Inventory time series, at least in some regions of the United States, but there are currently no datasets to evaluate the trends. Changes in litter C stocks are also assumed to be negligible in croplands over annual time frames, although there are certainly significant changes at sub-annual time scales across seasons. However, this trend may change in the future, particularly if crop residue becomes a viable feedstock for bioenergy production.

### **Land Converted to Cropland**

The uncertainty analysis for biomass, dead wood and litter C losses with *Forest Land Converted to Cropland* is conducted in the same way as the uncertainty assessment for forest ecosystem C flux in the *Forest Land Remaining Forest Land* category.

Uncertainty is also associated with lack of reporting of agricultural biomass and dead organic matter C stock changes. Biomass C stock changes are likely minor in perennial crops, such as orchards and nut plantations, given the small amount of change in land used to produce these commodities in the United States. In contrast, agroforestry practices, such as shelterbelts, riparian forests and intercropping with trees, may have led to significant changes in biomass C stocks, at least in some regions of the United States. However, there are currently no datasets to evaluate the trends. Changes in dead organic matter C stocks are assumed to be negligible with conversion of land to croplands with the exception of forest lands, which are included in this analysis. This assumption will be further explored in a future analysis.

### **Grassland Remaining Grassland**

The uncertainty analysis descriptions in this section correspond to source categories included in the *Grassland Remaining Grassland* sub-chapter of Land Use, Land-Use Change, and Forestry chapter of the Inventory.

#### **Soil Carbon Stock Changes**

Uncertainty is associated with a lack of reporting on biomass and litter C stock changes. Biomass C stock changes may be significant for managed grasslands with woody encroachment despite not having attained enough tree cover to be considered forest lands. Changes in dead organic matter C stocks are assumed to be negligible in grasslands on an annual basis, although there are certainly significant changes at sub-annual time scales across seasons.

#### **Non-CO<sub>2</sub> Emissions from Grassland Fires**

Uncertainty is associated with lack of reporting of emissions from biomass burning in grassland of Alaska. There is also uncertainty due to lack of reporting combustion of woody biomass, and this is another planned improvement.

### **Land Converted to Grassland**

The uncertainty analysis for biomass, dead wood and litter C losses with *Forest Land Converted to Grassland* is conducted in the same way as the uncertainty assessment for forest ecosystem C flux in the *Forest Land Remaining Forest Land* category.

### **Wetlands Remaining Wetlands**

The uncertainty analysis descriptions in this section correspond to source categories included in the *Wetlands Remaining Wetlands* sub-chapter of Land Use, Land-Use Change, and Forestry chapter of the Inventory.

#### **Peatlands Remaining Peatlands**

The uncertainty associated with peat production data was estimated to be  $\pm 25$  percent (Apodaca 2008) and assumed to be normally distributed. The uncertainty associated with peat production data stems from the fact that the USGS receives data from the smaller peat producers but estimates production from some larger peat

distributors. The peat type production percentages were assumed to have the same uncertainty values and distribution as the peat production data (i.e.,  $\pm 25$  percent with a normal distribution). The uncertainty associated with the reported production data for Alaska was assumed to be the same as for the lower 48 states, or  $\pm 25$  percent with a normal distribution. It should be noted that the DGGs estimates that around half of producers do not respond to their survey with peat production data; therefore, the production numbers reported are likely to underestimate Alaska peat production (Szumigala 2008). The uncertainty associated with the average bulk density values was estimated to be  $\pm 25$  percent with a normal distribution (Apodaca 2008). IPCC (2006 and 2013) gives uncertainty values for the emissions factors for the area of peat deposits managed for peat extraction based on the range of underlying data used to determine the emission factors. The uncertainty associated with the emission factors was assumed to be triangularly distributed. The uncertainty values surrounding the C fractions were based on IPCC (2006) and the uncertainty was assumed to be uniformly distributed. The uncertainty values associated with the fraction of peatland covered by ditches was assumed to be  $\pm 100$  percent with a normal distribution based on the assumption that greater than 10 percent coverage, the upper uncertainty bound, is not typical of drained organic soils outside of The Netherlands (IPCC 2013).

### **Coastal Wetlands**

Underlying uncertainties in estimates of soil C stock changes and methane emissions include error in uncertainties associated with Tier 2 literature values of soil C stocks and methane flux and assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data. Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes which determines the soil C stock and methane flux applied. Soil C stocks and methane fluxes applied are determined from vegetation community classes across the coastal zone and identified by NOAA C-CAP. Community classes are further subcategorized by climate zones and growth form (forest, shrub-scrub, marsh). Soil C stock data for all subcategories are not available and thus assumptions were applied using expert judgement about the most appropriate assignment of a soil C stock to a disaggregation of a community class.

Uncertainties in N<sub>2</sub>O emissions from aquaculture are based on expert judgement for the NOAA *Fisheries of the United States* fisheries production data ( $\pm 100$  percent) multiplied by default uncertainty level for N<sub>2</sub>O emissions found in Table 4.15, chapter 4 of the *Wetlands Supplement*.

### **Land Converted to Coastal Wetlands**

Underlying uncertainties in estimates of soil C removal factors and CH<sub>4</sub> include error in uncertainties associated with Tier 2 literature values of soil C removal estimates and CH<sub>4</sub> flux, assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data.

### **Settlements Remaining Settlements**

The uncertainty analysis descriptions in this section correspond to source categories included in the *Settlements Remaining Settlements* sub-chapter of the Land Use, Land-Use Change, and Forestry chapter of the Inventory.

#### **Soil Carbon Stock Changes**

Uncertainty of soil carbon stock changes is a result of soil C losses from drained organic soils in *Settlements Remaining Settlements*.

#### **Changes in Carbon Stocks in Settlement Trees**

Uncertainty associated with changes in C stocks in settlement trees includes the uncertainty associated with settlement area, percent urban tree coverage in developed land and how well it represents percent tree cover in settlement areas, and estimates of gross and net C sequestration for each of the 50 states and the District of Columbia. A 10 percent uncertainty was associated with settlement area estimates based on expert judgment. Uncertainty associated with estimates of percent settlement tree coverage for each of the 50 states was based on standard error associated with the photo-interpretation of national tree cover in developed lands. Uncertainty associated with estimates of gross and net C sequestration for each of the 50 states and the District of Columbia was based on standard error estimates for each of the state-level sequestration estimates (Table 6-74 of Section 6.10, Changes in Carbon Stocks in Settlement Trees). These estimates are based on field data collected in each of the 50 states and the District of Columbia, and uncertainty in these estimates increases as they are scaled up to the national level.

Additional uncertainty is associated with the biomass equations, conversion factors, and decomposition assumptions used to calculate C sequestration and emission estimates (Nowak et al. 2002). These results also exclude changes in soil C stocks, and there is likely some overlap between the settlement tree C estimates and the forest tree C estimates (e.g., Nowak et al. 2013).

## **N<sub>2</sub>O Fluxes from Settlement Soils**

The amount of N<sub>2</sub>O emitted from settlement soils depends not only on N inputs and area of drained organic soils, but also on a large number of variables that can influence rates of nitrification and denitrification, including organic C availability; rate, application method, and timing of N input; oxygen gas partial pressure; soil moisture content; pH; temperature; and irrigation/watering practices. The effect of the combined interaction of these variables on N<sub>2</sub>O emissions is complex and highly uncertain. The IPCC default methodology does not explicitly incorporate any of these variables, except variations in the total amount of fertilizer N and biosolids applications. All settlement soils are treated equivalently under this methodology.

Uncertainties exist in both the fertilizer N and biosolids application rates in addition to the emission factors. Uncertainty in fertilizer N application is assigned a default level of  $\pm 50$  percent.<sup>140</sup> Uncertainty in drained organic soils is based on the estimated variance from the NRI survey (USDA-NRCS 2015). For 2013 to 20176, there is also additional uncertainty associated with the surrogate data method. Uncertainty in the amounts of biosolids applied to non-agricultural lands and used in surface disposal is derived from variability in several factors, including: (1) N content of biosolids; (2) total sludge applied in 2000; (3) wastewater existing flow in 1996 and 2000; and (4) the biosolids disposal practice distributions to non-agricultural land application and surface disposal. Uncertainty in the direct and indirect emission factors is provided by IPCC (2006).

## **Changes in Yard Trimming and Food Scrap Carbon Stocks in Landfills**

The uncertainty analysis for landfilled yard trimmings and food scraps includes an evaluation of the effects of uncertainty for the following data and factors: disposal in landfills per year (tons of C), initial C content, moisture content, decay rate, and proportion of C stored. The C storage landfill estimates are also a function of the composition of the yard trimmings (i.e., the proportions of grass, leaves and branches in the yard trimmings mixture). There are respective uncertainties associated with each of these factors.

## **Waste**

The uncertainty analysis descriptions in this section correspond to source categories included in the Waste chapter of the Inventory.

### **Landfills**

Several types of uncertainty are associated with the estimates of CH<sub>4</sub> emissions from MSW and industrial waste landfills when the FOD method is applied directly for 1990 to 2004 in the Waste Model and, to some extent, in the GHGRP methodology. The approach used in the MSW emission estimates assumes that the CH<sub>4</sub> generation potential ( $L_0$ ) and the rate of decay that produces CH<sub>4</sub> from MSW, as determined from several studies of CH<sub>4</sub> recovery at MSW landfills, are representative of conditions at U.S. MSW landfills. When this top-down approach is applied at the nationwide level, the uncertainties are assumed to be less than when applying this approach to individual landfills and then aggregating the results to the national level. In other words, the FOD method as applied in this Inventory is not facility-specific modeling and while this approach may over- or under-estimate CH<sub>4</sub> generation at some landfills if used at the facility-level, the result is expected to balance out because it is being applied nationwide. There is also a high degree of uncertainty and variability associated with the FOD model, particularly when a homogeneous waste composition and hypothetical decomposition rates are applied to heterogeneous landfills (IPCC 2006). There is less uncertainty in the GHGRP data because this methodology is facility-specific, uses directly measured CH<sub>4</sub> recovery data (when applicable), and allows for a variety of landfill gas collection efficiencies, destruction efficiencies, and/or oxidation factors to be used.

Uncertainty also exists in the scale-up factor applied for years 2005 to 2009 and in the back-casted emissions estimates for 2005 to 2009. Limited information is available for landfills that do not report to the GHGRP and assumptions were made for many landfills in order to estimate the scale-up factor. Additionally, a simple methodology was used to back-cast emissions for 2005 to 2009 using the GHGRP emissions from 2010 to 2017. This methodology does not factor in annual landfill to landfill changes in landfill CH<sub>4</sub> generation and recovery.

Aside from the uncertainty in estimating landfill CH<sub>4</sub> generation, uncertainty also exists in the estimates of the landfill gas oxidized. Another significant source of uncertainty lies with the estimates of CH<sub>4</sub> recovered by flaring and gas-to-energy projects at MSW landfills that are sourced from the Inventory's CH<sub>4</sub> recovery databases (used for years 1990 to 2004). The lack of landfill-specific information regarding the number and type of industrial waste landfills in the United States is a primary source of uncertainty with respect to the industrial waste generation and emission estimates.

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<sup>140</sup> No uncertainty is provided with the USGS fertilizer consumption data (Ruddy et al. 2006) so a conservative  $\pm 50$  percent is used in the analysis. Biosolids data are also assumed to have an uncertainty of  $\pm 50$  percent.

## Wastewater Treatment

The overall uncertainty associated with both the 2017 CH<sub>4</sub> and N<sub>2</sub>O emission estimates from wastewater treatment and discharge was calculated using the 2006 IPCC Guidelines Approach 2 methodology (IPCC 2006). Uncertainty associated with the parameters used to estimate CH<sub>4</sub> emissions include that of numerous input variables used to model emissions from domestic wastewater, and wastewater from pulp and paper manufacturing, meat and poultry processing, fruits and vegetable processing, ethanol production, and petroleum refining.

Uncertainty associated with the parameters used to estimate N<sub>2</sub>O emissions include that of biosolids disposal, total U.S. population, average protein consumed per person, fraction of N in protein, non-consumption nitrogen factor, emission factors per capita and per mass of sewage-N, and for the percentage of total population using centralized wastewater treatment plants.

Uncertainty associated with constructed wetlands parameters including U.S. population served by constructed wetlands, and emission and conversion factors are from IPCC (2013), whereas uncertainty associated with POTW flow to constructed wetlands and influent BOD and nitrogen concentrations were based on expert judgment.

## Composting

The estimated uncertainty from the 2006 IPCC Guidelines is  $\pm 50$  percent for the Approach 1 methodology.

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