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Mandatory Greenhouse Gas Reporting – Is Your Facility Covered?

Beginning January 1, 2010, large emitters of greenhouse gases (GHGs) will be required to collect and report their GHG data to US Environmental Protection Agency (EPA). An estimated 85 percent of the nation's GHG emissions, from approximately 10,000 facilities, will be covered by the new reporting program. To determine whether your facility is covered, you must determine whether your company emits any GHGs above the threshold carbon dioxide equivalent and whether your facility falls within one of the regulated industries.

GHGs Covered by the Rule

Gases covered by the proposed rule include:

- Carbon Dioxide (CO₂)
- Methane (CH₄)
- Hydrofluorocarbons (HFC)
- Nitrous Oxide (N₂O)
- Sulfur Hexafluoride (SF₆)
- Perfluorocarbons (PFC)
- Other Fluorinated Gases including Nitrogen Trifluoride (NF₃) and Hydrofluorinated Ethers (HFE)

Facilities Covered by the Rule

Facilities that emit **25,000** metric tons or more of CO₂ equivalent per year will be required to report GHG emissions data to US EPA annually. For example, one metric ton of methane is equivalent to 21 metric tons of CO₂, so a facility that emits approximately 1,190 metric tons of methane would be covered by the reporting rule.

The industries regulated by the reporting rule include but are not limited to:

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| ■ Ammonia Manufacturing | ■ Manure Management Systems |
| ■ Aluminum Production | ■ Petrochemical Production |
| ■ Electrical Generation | ■ Petroleum Refineries |
| ■ General Stationary Fuel Combustion Sources | ■ Pulp and Paper Manufacturing |
| ■ Glass Production | ■ Silicon Carbide Production |
| ■ Iron or Steel Production | |
| ■ Lead Production | |

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Vehicle and engine manufacturers outside of the light-duty sector will begin phasing in GHG reporting with model year 2011.

The following industries are exempted from the reporting rule at this time:

- Electronics Manufacturing
- Ethanol Production
- Fluorinated GHG Production
- Food Processing
- Industrial Landfills
- Magnesium Production
- Oil and Natural Gas Systems
- SF6 from Electrical Equipment
- Underground Coal Mines
- Wastewater Treatment
- Coal Suppliers

Reporting Requirements

If your facility is covered by the GHG reporting rule, you will need to begin measuring and recording your GHG emissions beginning January 1, 2010. The first annual reports for the largest emitting facilities, covering calendar year 2010, are due March 31, 2011. Reporting is at the facility level, except that certain suppliers of fossil fuels and industrial GHGs along with vehicle and engine manufacturers will report at the corporate level.

The preamble and text of US EPA's final rule is more than 1,000 pages long. We can assist you in determining whether the rule is applicable to your facility, and if so, assist you in complying with the reporting requirements of the rule.

