





The Shifting  
Sands of GHG  
Regulation  
PA Chamber Conference – April 2010


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### Discussion Topics

- EPA's Mandatory GHG Reporting Rule – Recent Guidance/Developments
- Update on the Federal GHG Regulatory Landscape
  - ▲ Brief History of Federal Activity regarding GHG Regulation
  - ▲ Regulation of GHGs Under the Clean Air Act...Proposed Tailoring Rule
  - ▲ Interim Phase I Report from Climate Change Work Group and Recent GHG BACT Findings
  - ▲ Additional GHG Guidance/Cap and Trade
- Considerations for Developing a Practical Carbon Management Strategy







# EPA Mandatory Reporting of GHGs Rule


40 CFR 98

## Recent Guidance and Developments




## EPA MRR: Dates to Know!

- April 1, 2010
  - ▲ Must use required monitoring method, unless extension request approved
  - ▲ Monitoring Plan must be in place
- January 30, 2011
  - ▲ Due date for Certificate of Representation for Designated Representative
- March 31, 2011
  - ▲ First Annual GHG Report due for 2010



**FAQ Link:**  
[http://www.epa.gov/climatechange/emissions/ghg\\_faq.html](http://www.epa.gov/climatechange/emissions/ghg_faq.html)





## Recent EPA Guidance

<[http://www.epa.gov/climatechange/emissions/ghg\\_faq.html](http://www.epa.gov/climatechange/emissions/ghg_faq.html)>

- EPA does not intend for the calibration requirements of 98.3(i) to apply to any units where the rule allows the use of “company records” to quantify fuel usage or other parameters; however, a facility’s GHG monitoring plan must include descriptions of the procedures and methods used for quality assurance, maintenance, repair of *all* flow meters and any other instrumentation used to measure fuel consumption
- Comfort heaters and water heaters are considered to be part of the Subpart C source category
- Pilot fuel gas combustion is not considered to be part of the Subpart C source category

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## Recent EPA Guidance

### Response to Inquiries

- If Tier 4 is used and SSM emissions are routed through a separate stack that is not equipped with a CEMS, missing data procedures may be used to calculate those emissions
- HHV data used for Tier 2 and carbon content data used for Tier 3 calculations must be based on an approved test method listed in 98.34
  - ▲ For units not required to use Tiers 3 or 4, Tier 2 can only be triggered if available HHV data is based on a test method listed in the rule. If the reporter does not measure the HHV and does not routinely receive results of sampling and analysis from the fuel supplier, then use Tier 1. If frequency of HHV measurements is less than that listed in 98.34(a)(2) use Tier 1.

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## Recent EPA Guidance

NPRA Conference Presentation by ERM

- Q1: For orifice, nozzle & venturi meters: Do gas flow meter readings need to be T, P corrected?
- Q2: If P,T compensation transmitters are not in place for a flow meter does the rule require installation of these as opposed to utilizing constants based upon the fluid properties?

EPA Response: Orifice, nozzle and venturi fuel flow meters must be equipped with differential pressure, total pressure and temperature transmitters in order to comply with 98.3(i)(3). Using constants based upon fluid properties is not allowed. The rule provides special provisions for reporting year 2010 that allows owners and operators to request the use of best available monitoring methods. (See 98.3(d))




## Treatment of Reserved Subparts

- Based on the complexity of the public comments received, EPA marked 9 proposed source categories and 1 supplier category as *RESERVED* in the MRR
- On March 22, 2010, EPA re-proposed Subparts I, L, W and DD. Also proposed Subpart RR on CO<sub>2</sub> Injection and Geologic Sequestration, proposed the inclusion of additional sources of fluorinated GHGs in Subpart OO and proposed Subpart SS on Electrical Equipment Manufacture or Refurbishment
- EPA plans to complete supplemental evaluations and issue final rules for all *RESERVED* subparts in 2010

- Subpart I – Electronics Manufacturing
- Subpart J – Ethanol Production
- Subpart L – Fluorinated GHG Production
- Subpart M – Food Processing
- Subpart T – Magnesium Production



- Subpart W – Oil and Natural Gas Systems
- Subpart DD – SF<sub>6</sub> from Electrical Equipment
- Subpart FF – Underground Coal Mines
- Subpart II – Wastewater Treatment
- Subpart KK – Suppliers of Coal
- Also, Subpart HH as it pertains to Industrial Landfills






### Summary of Recently Proposed/ Re-Proposed Subparts

- Subparts to be finalized this year with data collection beginning January 1, 2011 with first report to EPA due March 31, 2012.
- Subparts DD, I, L, OOa and SS for **Additional Sources of Fluorinated GHGs**
  - ▲ Reporting of fluorinated GHGs from electronics manufacturing facilities (semiconductors, LCD, micro-electro-mechanical systems and PV cells) with annual emissions  $\geq 25,000$  CO<sub>2</sub>e MT/year under Subpart I
  - ▲ Reporting of fluorinated GHGs from facilities that produce fluorinated gases (HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, HFES, CFCs and HCFCs) from any raw material of feedstock chemical with uncontrolled emissions  $\geq 25,000$  CO<sub>2</sub>e MT/year under Subpart L
  - ▲ Reporting of SF<sub>6</sub> and/or PFCs from electric power transmission and distribution equipment with total nameplate capacity  $\geq 17,820$  lbs under Subpart DD
  - ▲ Reporting of quantity of fluorinated GHGs imported/exported contained in pre-charged appliances and electrical equipment, closed-cell foams (foam products constructed with a closed cell structure and blowing agent containing fluorinated GHG) and in bulk (already covered under Subpart OO)  $\geq 25,000$  CO<sub>2</sub>e MT/year under Subpart OOa.
  - ▲ Reporting of fluorinated GHGs from manufacturers or refurbishers of electric power transmission and distribution equipment with SF<sub>6</sub> and PFC purchases  $\geq 23,000$  lbs/year.

### Summary of Recently Proposed/ Re-Proposed Subparts


- Addition of Subpart RR for CO<sub>2</sub> Injection and Geologic Sequestration
  - ▲ Reporting by facilities that inject CO<sub>2</sub> underground for the purpose of long-term geologic sequestration or to enhance oil and gas recovery.
  - ▲ Added to enable EPA to track use of Carbon Capture and Sequestration as CO<sub>2</sub> mitigation strategy and better understand quantity of CO<sub>2</sub> supplied to emissive vs. non-emissive end-uses.
- Revised Proposed Subpart W for Petroleum and Natural Gas Systems
  - ▲ Reporting of fugitive and vented methane and CO<sub>2</sub> process emissions and combustion emissions from flares from petroleum and natural gas facilities  $\geq 25,000$  CO<sub>2</sub>e MT/year.
  - ▲ Revised subpart includes onshore petroleum and natural gas production sites and natural gas local distribution companies not included in original proposed version of Subpart W – proposed definition of “facility” for these sources, as well as offshore production facilities, differ from definition of facility applied in remainder of MRR
  - ▲ GHG calculation methods include direct measurement of emissions when other methods are not feasible, but allows for use of less costly engineering estimates, emissions modeling software, and emission factors where appropriate.







Update on the  
Federal GHG  
Regulatory  
Landscape

Summary of Federal GHG Activity

- **EPA**
  - ▲ Brief History of Federal Activity regarding GHG Regulation
  - ▲ Regulation of GHGs Under the Clean Air Act...Proposed Tailoring Rule
  - ▲ Interim Phase I Report from Climate Change Work Group and Recent GHG BACT Findings
- **Congress**
  - ▲ House American Clean Energy and Securities Act of 2009 (Waxman-Markey)
  - ▲ Senate Clean Energy Jobs and American Power Act (Kerry-Boxer)
- **Other**
  - ▲ White House Council on Environmental Quality releases NEPA Guidance
  - ▲ SEC releases Guidance on Climate Change Disclosure





## GHGs Become a Pollutant

- In April 2007, the US Supreme Court ruled that GHGs meet the definition of air pollutants covered by CAA (Mass. vs. EPA)
- On December 7, 2009, Administrator finalizes its “Endangerment Finding” for GHGs, which formally authorizes EPA to promulgate regulations for GHGs



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## EPA's Light Duty Vehicle Rule

- On April 1, 2010, EPA and DOT finalized mobile source regulations that regulate GHGs for light-duty vehicles (LDVs)
- The LDV rule directly limits the mobile source emissions (tail-pipe emissions) of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs
- The LDV rule does not regulate SF<sub>6</sub>, PFCs (included in endangerment finding)
- Likely effective date would be from late May to late June
- Applies to passenger cars, light-duty trucks and medium-duty passenger vehicles models years 2012 through 2016

Link for LDV Rule:

<http://www.epa.gov/otaq/climate/regulations.htm>

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## Johnson Memo Reconsideration

- On March 29, 2010, EPA completed its reconsideration of the December 2008 Johnson memo which addressed when CAA PSD program would cover GHGs
- EPA has affirmed existing position that PSD is not triggered for a pollutant until a final nationwide rule requires actual control of emissions
- PSD requirements are triggered when the control requirement “takes effect” – same applies for Title V requirements
- PSD is triggered for GHG in January 2011 – the earliest 2012 vehicles meeting LDV rule standards can be sold in the US
- No “grandfathering” of pending permit applications
- EPA reinforced that new and modified large stationary sources must already consider energy efficiency when selecting BACT for non-GHG pollutants which translates to reduction in GHGs

Link to Policy: <http://www.epa.gov/nsr/guidance.html>



## Impact on Prevention of Significant Deterioration (PSD) and Title V Permitting

- Once GHGs become “subject to regulation” under CAA, EPA interprets that GHGs become regulated under Prevention of Significant Deterioration (PSD) and Title V regulations
- The Title V and PSD major source emission thresholds are “hard-wired” in the CAA.
  - ▲ **PSD - CAA Section 169** - *The term “major emitting facility” is defined as potential to emit **one hundred tons per year or more of any air pollutant** for 28 listed source categories or **two hundred and fifty tons per year or more of any air pollutant** for others*
  - ▲ **Title V - CAA Section 302** - *Except as otherwise expressly provided, the terms “major stationary source” and “major emitting facility” mean any stationary facility or source of air pollutants which directly emits, or has the potential to emit, **one hundred tons per year or more of any air pollutant***







## Proposed Tailoring Rule

- October 27, 2009, (74 FR 55292), Tailoring Rule proposed
- Increase the major source thresholds for GHGs from the current 100/250 tpy thresholds to 25,000 tpy, *effectively “tailoring” the PSD and Title V permit programs to target only “major” GHG sources and major modifications*
  - ▲ Significant emission rate (SER) of between 10,000 and 25,000 tpy CO<sub>2</sub>e
- Absent tailoring, permitting agencies would be overwhelmed with PSD and Title V applications
- Proposed regulation of 6 GHG compounds:
  - ▲ CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, & SF<sub>6</sub>


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## Requirements if PSD Triggered




- BACT
  - ▲ EPA has assembled a BACT task force to make recommendations to the Clean Air Act Advisory Committee – many questions still lack consensus
  - ▲ EPA intends on issuing “guidance,” especially for large CO<sub>2</sub> sources by the time the Tailoring Rule is finalized
- Modeling
  - ▲ A petition has been filed (December 2, 2009) to compel a NAAQS for CO<sub>2</sub>, but would seem very unlikely
- Draft permits are public noticed and subject to 30-day comment period

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## Impact on Title V Applicability

- New major sources
  - ▲ Those with emissions > 25,000 tpy CO<sub>2</sub>e would need to submit an application within 1 year of the trigger date (EPA projects that 14,000 existing facilities will need Title V permits)
- Existing major sources (already subject to Title V)
  - ▲ Minimal impact – would wait until Title V renewal to incorporate GHGs
  - ▲ No need at moment for earlier incorporation since there are currently no emission control requirements for GHGs for stationary sources such as NSPS



## State/Local Program Authority

- Uncertainty over whether state/local permitting agencies have authority to write permits for GHGs under their PSD and Title V regulations
  - ▲ Do their existing rules sufficiently incorporate federal rules by reference?
  - ▲ Do the state rules need to first be modified (e.g., some state rules explicitly identify what pollutants are regulated and thresholds associated with PSD and Title V)





## 2/22/2010 Lisa Jackson Letter

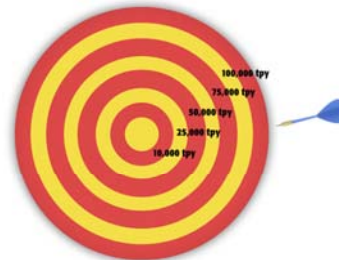
- Highlights.....
  - ▲ ***“I expect to take actions to ensure that no stationary source will be required to get a CAA permit to cover its GHG emissions in calendar year 2010”***
  - ▲ PSD Majors, first half of 2011 – ***“only those facilities that already must apply for CAA permits as a result of their non-GHG emissions will need to address GHG emissions in their permit applications”***....less than 400 according to EPA’s estimates
  - ▲ Latter half of 2011 to 2013, permitting threshold ***“substantially higher than the 25,000-ton limit that EPA originally proposed”***
  - ▲ EPA does not intend to subject the “smallest sources” to CAA permitting for GHG emissions ***any sooner than 2016.***

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## 3/3/2010 Lisa Jackson Senate Appropriations Testimony

- EPA may set a threshold of 75,000 tpy of GHGs for permitting stationary sources prior to 2013
  - ▲ By the end of 2011, 1,700 permits would be required that would not be required in 2010
  - ▲ By the end of 2013 (threshold dependent) an additional 3,000 sources could need permits
- EPA may consider moving threshold to ~50,000 tpy starting in 2013
  - ▲ Would account for 70% of nations stationary source emissions



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## Update on GHG BACT Work Group Findings and Recent BACT Determinations

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### GHG BACT

- Phase I report issued on February 3, 2010. Phase I presumed a continuation of top-down approach.
- Phase II report was due on March 30, 2010. Phase II work to address:
  - ▲ Scope of applicability of PSD and BACT to GHG sources
  - ▲ Appropriateness of “presumptive” BACT
  - ▲ Appropriateness of the use of averaging or trading as BACT
  - ▲ Appropriateness to use broader supply chain reductions as BACT (reduced carbon intensity, increased efficiency and/or demand reduction)
  - ▲ Methods (reviews and permit conditions) to encourage innovative GHG controls
  - ▲ Evaluating energy efficient processes and practices. Potential for output based limitations, etc.

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### GHG BACT (cont.)

- The workgroup agreed that GHG BACT should apply to new and modified emission units (undergoing PSD review and triggering for GHGs).
- The workgroup did not agree on whether BACT can (or should consider) changes to the basic design of a proposed project (alternative manufacturing processes, etc.).
- There was general consensus on the process for which technical feasibility would be addressed. However, the value of commercial guarantees (or lack thereof) in determining whether a BACT option is feasible remains contentious.

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### GHG BACT (cont.)

- Carbon Capture and Sequestration (CCS)
  - ▲ General consensus among the committee concerning the details of feasibility
  - ▲ No consensus on whether a site should be forced to consider alternative locations (availability of sequestration capacity)
  - ▲ No consensus on the extent or degree of availability before CCS is considered “demonstrated”
  - ▲ No consensus on the degree to which CCS technology can be transferred from one source type to another

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## GHG BACT (cont.)

- Energy Efficiency
  - ▲ Should be considered in the BACT analysis as a factor in evaluating BACT alternatives and setting emission limits
  - ▲ Specific energy efficiency limits may be difficult to quantify continuously
  - ▲ There was no consensus on scope of the energy efficiency considerations

Link for Climate Change Workgroup:

<http://www.epa.gov/air/caaac/climatechangewg.html>

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## Calpine Russell City Energy Center

- Calpine 612 MW natural gas fired combined cycle power plant in Hayward, CA - two combustion turbines and two heat recovery steam generators
- Control Technology – Dry Low NO<sub>x</sub> Combustors, SCR, Oxidation Catalyst
- Calpine requested CO<sub>2</sub> BACT determination and a CO<sub>2</sub> limitation from Bay Area AQMD (BAAQMD) – voluntary to address Desert uncertainty



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## Calpine Russell City Energy Center

- BACT Review

- ▲ Followed 5-Step Approach
- ▲ Feasible technologies
  - Subterranean or bio-sequestration not feasible options
  - Thermal efficiency only combustion control identified
- ▲ Non fossil alternatives
  - Energy commission (not the Air District) determines type of generation (NG combined cycle)
  - Noted that EPA has made clear that BACT should not include alternative technologies that alter the project's fundamental scope



## Calpine Russell City Energy Center

- High efficiency power generation only option
- Most Efficient Combined Cycle
  - ▲ Comments around G and H class turbines achieving 58-60% versus the proposed turbines
  - ▲ BAAQMD noted that a gross efficiency of 56.45% is the basis for the GHG BACT
- BACT Emissions Standard
  - ▲ BAAQMD initially proposed 1,100 lb/MW-hr (but the link to thermal efficiency was questioned by commentors)





## Calpine Russell City Energy Center

- BACT Emissions Standard (ctd.)
  - ▲ Output-based Efficiency Limit - 7,730 Btu/kW-hr (HHV), design base heat rate was 6,852 Btu/kW-hr
    - Factored in degradation on heat rate (normal wear and tear) plus a margin for other items (NG variability, cooling water variability, etc.)
  - ▲ Input-based Limit - mass emissions limits in metric tons (1-hr, 24-hr, annual) and heat input limits (MMBtu) based on max rated heat input capacity of turbines



## Calpine Russell City Energy Center

Avg. Period	Heat Input Limit (MMBtu)	GHG Emission Limits (metric tons CO <sub>2</sub> e)			
		CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
1-Hour	4,477.2	242	0.08	0.14	242
24-Hour	107,452	5,797	2.03	3.33	5,802
Annual	35,708,858	1,926,399	675	1,107.48	1,928,182

Other Notes on Thermodynamics and Efficiency (will be key in GHG CAA world)

- HHV (gross), LHV (net)
- Efficiency – gross v. net (where is it measured?)
- e.g., “Net HHV” can refer to net across plant on HHV basis





## SE Idaho Energy – Advanced Energy Center

- Permit for coal gasification facility issued November 30, 2009
- Sierra Club and Idaho Conservation League petition IDEQ to include CO<sub>2</sub> emission limit for a vent stream (756,000 tpy CO<sub>2</sub> – rolling 12-month)
  - ▲ Limit based on capture and sequestration of 58 percent of the plant’s CO<sub>2</sub> output
  - ▲ Take effect 5 years after mechanical completion
- For an interim period before the compliance date, GHG offsets may be required for a portion of the emissions stream - federal, state or regional (or Climate Action Reserve, VCS, etc.) – could be up to 1.1 MM tons CO<sub>2</sub>/year



## Carbon Cap and Trade

- Cap and trade has lost momentum at present (jobs, health care)
  - ▲ House American Clean Energy and Securities Act of 2009 (Waxman-Markey)
  - ▲ Senate Clean Energy Jobs and American Power Act (Kerry-Boxer)
- No shortage of bills or “angles” on cap and trade
  - ▲ Bi-partisan “compromise” bill in senate sponsored by Kerry, Lieberman and Graham
  - ▲ Cantwell Collins Cap and Dividend Plan – direct refunds to consumers

**capanddividend**

**Top five reasons for cap and dividend**

1. It gets the job done.
2. It's simple.
3. It's fair.
4. It's progressive.
5. It's market-based.

<http://www.capanddividend.org/>





## NEPA/CEQ GHG Guidance

- Draft guidance memorandum published in the Federal Register on February 23, 2010 (90 day comment period ends May 24, 2010)
- Covers all agency actions requiring NEPA review, except federal land and resource management activities
- Requires estimation of potential GHG emissions from the proposed action over the life of the project – mentions 25,000 metric ton CO<sub>2</sub>e as significant (direct emissions) and an evaluation of mitigation measures
- Sensitivity, location and timeframe are also factors
- Climate modeling limitations acknowledged



## SEC Guidance on Climate Change-Related Disclosures in Financial Reporting

- February 2, 2010, SEC released new interpretive guidance on outlining position on requirements for companies to include climate change-related information in financial reporting
- Guidance does not create any new rules, but provides an overview of the current SEC rules that could require disclosure of climate change-related information:
  - ▲ Item 101 – requires disclosure of costs of complying with environmental laws/as well as opportunities new laws may present to company
  - ▲ Item 103 – requires description of legal proceedings to which company is a party
  - ▲ Item 503(c) – requires description of factors that make an investment in company risky
  - ▲ Item 303 – requires identification of known trends, events, demands commitments and uncertainties that are reasonably likely to have a material effect on financial condition or operating performance.





## SEC Guidance on Climate Change-Related Disclosures in Financial Reporting

- Guidance discusses a number of specific issues related to climate change that may require disclosure
  - ▲ Costs to purchase credits and profits from sales of credits under a cap and trade system
  - ▲ Costs to improve facility to mitigate emissions
  - ▲ Changes to profit/loss arising from increased/decreased demand for goods and services as a direct result of climate change regulation and/or international accords
  - ▲ Indirect risk of reputational damage due to public's perception of company's reported GHG emissions/carbon footprint
  - ▲ Potential physical impacts of climate change (severe weather, sea levels, water availability, etc.)

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## Strategies for Navigating the “Shifting Sands” of GHG Regulation



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### What Should I Do Next? – Immediate Steps

- Determine ‘potential’ CO<sub>2</sub>e emissions
  - ▲ Already completed for most large sources
    - MRR, shareholder-driven, voluntary programs, etc.
- Track Congress actions closely
  - ▲ Will EPA’s Initiatives be blocked, or will it accelerate Cap and Trade (doesn’t look this way now)
- Understand How EPA’s Initiatives Affect You
  - ▲ For existing PSD major sources *and* minor sources
    - Review upcoming modifications to determine if CO<sub>2</sub>e emissions increase could trigger PSD
  - ▲ Be prepared for Title V submittals
    - Initial or renewal

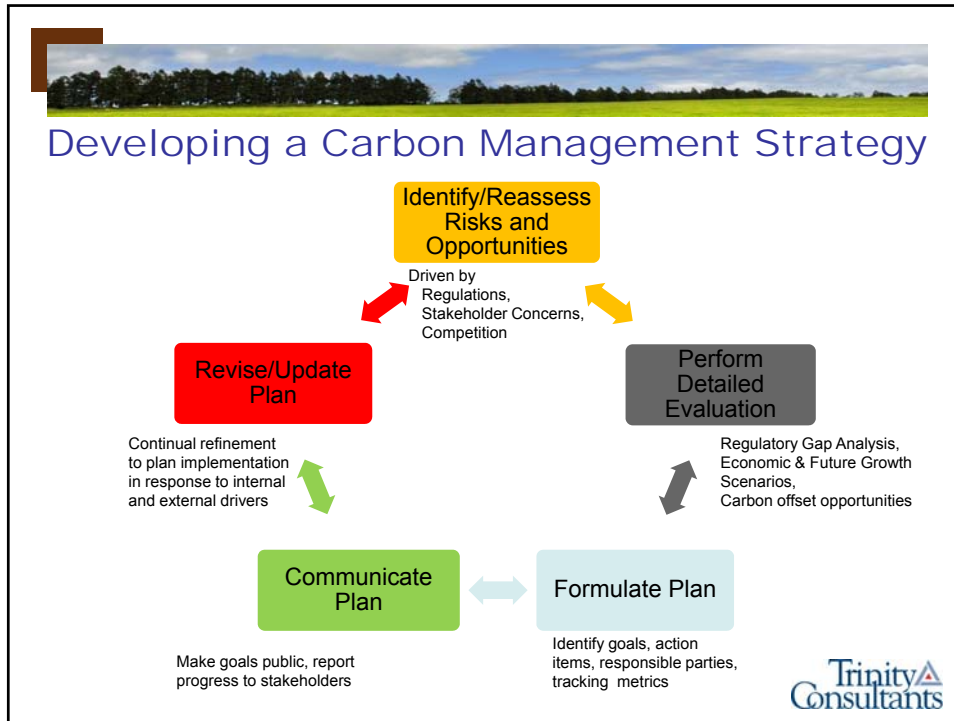


### Long Range Planning – Developing a Carbon Management Strategy

- Identify Risks and Opportunities associated with Climate Change
- Perform a Detailed Evaluation of Potential Risks and Opportunities Identified
- Develop a Plan with Discreet Targets and Goals (short-, mid- and long-range)
- Communicate Plan to Stakeholders
- Revise/Update Plan







- 
- Developing a Practical Carbon Management Strategy**
- Step 1 - Identify Risks and Opportunities**
    - Assess factors that may pose climate change risks or present opportunities to your organization, including:
      - ❖ International, regional, and state regulations
      - ❖ Customer requirements (e.g., Wal-Mart Supply Chain Sustainability Surveys)
      - ❖ Corporate directives - Companies are motivated by cost savings, social responsibility and reputation enhancement
      - ❖ Other stakeholder concerns – (e.g., Life Cycle Analysis)
      - ❖ Sector-specific considerations and benchmarking against the competition
- Trinity Consultants logo is located in the bottom right corner.



## Developing a Practical Carbon Management Strategy

### ▪ **Step 2 - Evaluate Exposure/Potential Opportunities**

- ▲ Quantify & rank potential climate change risks and opportunities
- ▲ Identify areas that warrant additional, more detailed analysis
- ▲ Identify where gaps may exist that need to be closed to minimize exposure to risk and maximize gains from opportunities
- ▲ Develop a more detailed analysis of risks and opportunities
  - ❖ Analyze multiple regulatory development scenarios, economic trends and organization-specific growth scenarios
  - ❖ Assess carbon offset opportunities



## Developing a Practical Carbon Management Strategy

### ▪ **Step 3 - Develop a Plan**

- ▲ Corporate decision-makers must be advised and involved in determining appropriate corporate response
- ▲ Select specific options for mitigating climate change risks and maximizing opportunities presented by a carbon-constrained economy
- ▲ For each option, develop a “roadmap”
  - ❖ Assess technical feasibility, resource availability, costs and timeframe for implementation
  - ❖ Develop and prioritize action items
  - ❖ Identify roles of responsibility and accountability
  - ❖ Define metrics for tracking purposes
- ▲ Establish short-term, mid-term and long-term targets





## Developing a Practical Carbon Management Strategy

- **Step 4 - Communicate Plan**
  - ▲ Inform stakeholders of short and long-term objectives and mitigation goals
  - ▲ Communicate program status and results (e.g., corporate Sustainability Report, Carbon Disclosure Project, etc.)
- **Step 5 – Update/Revise Plan**
  - ▲ Continually revise and update plan
    - Based on periodic evaluation of plan effectiveness
    - In response to changing regulatory and stakeholder-driven requirements



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Questions?



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