

Washington's Greenhouse Gas Reporting Program Rule Update

December 3, 2014

Public Hearing on Proposed Rule Revisions

Stacey Callaway

Neil Caudill



Hearing Outline

- Brief presentation
- Questions and answers
- Formal hearing



Presentation Agenda

- Introductions / meeting procedures
- Brief overview of program
- Rule-making timeline
- Scope and purpose
- Next steps



Rule History

	Washington	EPA
2008	<ul style="list-style-type: none"> • Law passed by legislature • Initial rule making 	
2009		<ul style="list-style-type: none"> • March – proposed rule • October – rule adopted
2010	<ul style="list-style-type: none"> • Law revised by legislature • New rule making • December – rule adopted 	<ul style="list-style-type: none"> • Multiple revisions and additions
2011-2014		<ul style="list-style-type: none"> • Multiple revisions and additions
Started reporting emissions	<ul style="list-style-type: none"> • Calendar year 2012 	<ul style="list-style-type: none"> • Calendar year 2010

GHG Reporting Program Overview

Goal: Collect accurate and timely data on GHG emissions to inform future policy decisions

- Reporting only
- **No** control or reduction requirements



GHG Reporting Program Overview

- Facility reporting:
Compatible with EPA's GHG reporting program
- Transportation fuel supplier reporting:
Compatible with DOL's fuel tax reporting



Program Comparison

Subject	Washington	EPA
General requirements	WAC 173-441	40 CFR Part 98 Subpart A
Reporting threshold	$\geq 10,000$ MT CO ₂ e, including biomass	Approx. $\geq 25,000$ MT CO ₂ e, excluding biomass
Calculation methods	WAC 173-441-120	40 CFR Part 98 Subparts C-UU
Confidential business information	Case by case petition	Universal determination by rule
Data submission deferment	None	Some elements until 2015
Report submission	Electronic to Ecology (eGGR)	Electronic to EPA (eGGRT)
Registration / signature	Paper	Electronic
Sharing	Ecology shares data with LAA, EFSEC, public	EPA online public tool (FLIGHT)
Verification	Ecology	EPA
Funding	Annual reporting fee	Appropriation

Source Categories in Both Programs

General Stationary Fuel Combustion Sources	Iron and Steel Production	Soda Ash Manufacturing
Electricity Generation	Lead Production	Electrical Transmission and Distribution Equipment Use
Adipic Acid Production	Lime Manufacturing	Titanium Dioxide Production
Aluminum Production	Magnesium Production	Underground Coal Mines
Ammonia Manufacturing	Miscellaneous Uses of Carbonate	Zinc Production
Cement Production	Nitric Acid Production	Municipal Solid Waste Landfills
Electronics Manufacturing	Petroleum and Natural Gas Systems	Industrial Wastewater Treatment
Ferroalloy Production	Petrochemical Production	Geologic Sequestration of Carbon Dioxide
Fluorinated Gas Production	Petroleum Refineries	Electrical Equipment Manufacture or Refurbishment
Glass Production	Phosphoric Acid Production	Industrial Waste Landfills
HCFC-22 Production and HFC-23 Destruction	Pulp and Paper Manufacturing	Injection of Carbon Dioxide
Hydrogen Production	Silicon Carbide Production	

Source Category Differences

Washington	EPA
Manure Management (not implemented by EPA)	Suppliers of Carbon Dioxide
Suppliers of Carbon Dioxide (partially adopted)	Suppliers of Petroleum Products
Suppliers of Transportation Fuels	Suppliers of Coal
	Suppliers of Coal-based Liquids
	Suppliers of Natural Gas and Natural Gas Liquids
	Suppliers of Industrial GHGs
	Imports and Exports of Equipment Pre-charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed-cell Foams

Not Included in WA Program

- Entity level emissions
- Indirect emissions (electricity use or supply chain)
- Emission offsets
- Mobile sources: on-road, off-road, rail, marine, or aircraft
- Combustion: portable equipment, emergency generators, irrigation pumps, etc.
- Leaks from air conditioners
- Emissions without protocols in state/federal rules



Fuel Use to Trigger Threshold

Fuel Type	Approximate Fuel to Meet Threshold		Units per year
	10,000 MT CO ₂ e	25,000 MT CO ₂ e	
Natural gas	180,000,000	457,000,000	cubic feet
Bituminous coal	4,400	11,100	tons
Wood	5,700	14,400	tons
Residual oil (#6)	846,000	2,100,000	gallons
Diesel	980,000	2,460,000	gallons
Gasoline	1,120,000	2,800,000	gallons
SF ₆ [*]	415	1,050	kg

* Fugitive emissions

Rule-Making Timeline

July 31, 2014	Announced rule making (filed CR-101)
August 28, 2014	Stakeholder meeting
October 2014	Propose rule (filed CR-102)
December 2014	Public hearing and comment period
February 2015	Adopt rule (file CR-103)
March 2015	Rule effective



Purpose: EPA Consistency

- WA law requires consistency with EPA
- Continue using current reporting system
 - Familiarity for reporters to both systems
 - Reduces Ecology costs = lower fees
 - High quality EPA reporting tool
- All WA reporters use EPA reporting tool but EPA only collects data from those required to report to EPA
- Comparable data sets (federal and state)



Scope

Examples of proposed amendments:

- Revise Global Warming Potentials (GWPs) in WAC 173-441-040 (July 31st proposed GHGs)
- Update calculation and monitoring methods (September 26th adopted verification tool)
- Make minor streamlining revisions to reporting requirements
- Correct minor errors and improve readability



Scope

Not included in rule making:

- Transportation fuel supplier requirements
- Facility reporter requirements:
 - Reporting threshold,
 - Confidential business information, or
 - Fees.



Next Steps

Ecology will:

- Review comments
 - December 10 – last day to submit comments
- Prepare final version of proposed rule
- Respond to comments
- Adopt final rule



Contact

Stacey Callaway

(for procedural questions)

Stacey.Callaway@ecy.wa.gov

360-407-7528

Neil Caudill

(for technical questions)

Neil.Caudill@ecy.wa.gov

360-407-6811

<http://www.ecy.wa.gov/programs/air/rules/wac173441/1313ov.htm>

http://www.ecy.wa.gov/programs/air/permit_register/ghg/ghg.html





Questions

Formal Hearing



How to Comment after the Hearing

Written comments must be received by
December 10, 2014

Send them to Stacey Callaway in any of the
following ways:

Email AQComments@ecy.wa.gov

Mail Washington State Department of Ecology
Greenhouse Gas Reporting Program
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Fax 360-407-7534

