



MANDATORY GHG REPORTING RULE

Recommendation: We believe the compliance deadline is not feasible and recommend that "best available data" be used for the first year of reporting and for the following years where it is infeasible to install the required monitoring device.

Recommendation: Where installation or maintenance of instrumentation would require a process unit shutdown, EPA should allow the use of best available data until the next planned process unit shutdown.

Recommendation: Allow for best industry practices in place of outdated or inappropriate standards.

Recommendation: We believe that detailed data on individual facility units should NOT be included in this rulemaking.

Recommendation: API believes EPA should adopt a 5% de minimis cut-off level and allow reporters to use simplified methods that can be used to demonstrate this exclusion.

Recommendation: We suggest the once in always in provision specified in §98.2(g) should be revised to include (1) a process, similar to the California regulations, that allows a facility to exit the reporting program if the reported facility emissions are under the applicability threshold for two or three consecutive years; and (2) a mechanism for facilities making permanent changes, such as removing equipment from their site, to notify EPA and end reporting for the removed equipment.

Recommendation: We believe that there are unnecessary requirements for reporting petroleum products supply and suggest that the volumes in the reporter's financial records be used as an alternative to the monitoring requirement thus allowing refineries, importers, and exporters to use quantities from their existing custody transfer and accounting systems.

Recommendation: API requests that EPA modify the definition of "fugitive emissions" (Preamble at: 74 FR 68, page 16529) to the more traditional definition used in other Clean Air Act programs.

Recommendation: API requests that EPA simplify the methodology for determination of emissions from fugitives ie: (valves, connectors, pump seals, reciprocating compressor seals, etc.) to include a component count and leak factor

approach rather than the leak detection and quantification methods in the proposed rule.

Recommendation: API requests that EPA broaden the methodologies to include acceptable engineering techniques for monitoring and subsequent determination of emissions from Subpart W source types.

Recommendation: API requests that EPA develop an applicability-screening tool for facilities, particularly for those source categories whose applicability threshold is based on an aggregation of combustion emissions (subpart C) and industry segment specific emissions (such as in subparts J, P, and in particular W).

Recommendations: On the Designated representative, we suggest that the Agency revise language for designated representative to be consistent with other reporting programs, such as TRI.

Recommendation: For calculating methodology for ethylene plants, EPA should allow for ethylene plants to determine unit GHG emissions under the more appropriate Subpart C fuel combustion methodology (Subpart C), which is the methodology used currently by ethylene units.