

BAMM Requests for Reporters Newly Subject to the GHG Reporting Program

EPA finalized a rule (79 FR 73750) that became effective on January 1, 2015 that amended Part 98 to implement corrections, revisions and other amendments including amendments to the global warming potential (GWP) values for certain greenhouse gases (GHGs). For more detailed information on the changes to the GWPs and other changes finalized in this rule, please refer to the [rule factsheet](#) and the [preamble and rule](#). As a result of the changes to the GWP values, a facility may become subject to the Greenhouse Gas Reporting Program (GHGRP) for the first time.

98.3(l) of this rule provides special provisions for the use of best available monitoring methods (BAMM) in reporting year 2015. It states that owners or operators of facilities or suppliers that first become subject to any subpart of part 98 due to the recent amendments to Table A-1 of subpart A of Part 98 (79 FR 73750, December 11, 2014) may submit a request to the Administrator to use one or more best available monitoring methods beyond March 31, 2015. The extension request must be submitted to EPA no later than January 31, 2015.



Rule Language Related to BAMM Requests for Reporters Newly Subject to the GHGRP

Per 98.3(l)(1), from January 1, 2015 to March 31, 2015, owners or operators subject to 98.3 (l) may use best available monitoring methods for any parameter (e.g., fuel use, feedstock rates) that cannot reasonably be measured according to the monitoring and QA/QC requirements of a relevant subpart. The owner or operator must use the calculation methodologies and equations in the "Calculating GHG Emissions" sections of each relevant subpart, but may use the best available monitoring method for any parameter for which it is not reasonably feasible to acquire, install, and operate a required piece of monitoring equipment by January 1, 2015. Starting no later than April 1, 2015 the owner or operator must discontinue using best available methods and begin following all applicable monitoring and QA/QC requirements of this part, except as provided in 98.3 (l)(2). Best available monitoring methods means any of the following methods:

- Monitoring methods currently used by the facility that do not meet the specifications of a relevant subpart.
- Supplier data.
- Engineering calculations.
- Other company records.

The owner or operator may submit a request to the Administrator to use one or more best available monitoring methods beyond March 31, 2015.

The extension request must be submitted to EPA no later than January 31, 2015.

The request must contain the following information:

- A list of specific items of monitoring instrumentation for which the request is being made and the locations where each piece of monitoring instrumentation will be installed.
- Identification of the specific rule requirements (by rule subpart, section, and paragraph numbers) for which the instrumentation is needed.
- A description of the reasons that the needed equipment could not be obtained and installed before April 1, 2015.
- If the reason for the extension is that the equipment cannot be purchased and delivered by April 1, 2015, include supporting documentation such as the date the monitoring equipment was ordered, investigation of alternative suppliers and the dates by which alternative vendors promised delivery, backorder notices or unexpected delays, descriptions of actions taken to expedite delivery, and the current expected date of delivery.
- If the reason for the extension is that the equipment cannot be installed without a process unit shutdown, include supporting documentation demonstrating that it is not practicable to isolate the equipment and install the monitoring instrument without a full process unit shutdown. Include the date of the most recent process unit shutdown, the frequency of shutdowns for this process unit, and the date of the next planned shutdown during which the monitoring equipment can be installed. If there has been a shutdown or if there is a planned process unit shutdown between November 29, 2014 and April 1, 2015, include a justification of why the equipment could not be obtained and installed during that shutdown.
- A description of the specific actions the facility will take to obtain and install the equipment as soon as reasonably feasible and the expected date by which the equipment will be installed and operating.

To obtain approval, the owner or operator must demonstrate to the Administrator's satisfaction that it is not reasonably feasible to acquire, install, and operate a required piece of monitoring equipment by April 1, 2015. The use of best available methods under 98.3 (l) will not be approved beyond December 31, 2015.

Submitting a BAMM Request

Follow the steps below if you intend to submit a BAMM request:

1. Register the Facility in e-GGRT

a. If you haven't done so already, you'll first need to create a user account in e-GGRT before you can register a facility. To create a user account, go to <https://ghgreporting.epa.gov/> and click the NEW USER REGISTRATION button. For more information on creating a user account, refer to the "Basic User Registration" section on the [Registration Instructions](#) page.

b. Once your user account has been fully activated, you may register your facility by logging to e-GGRT at <https://ghgreporting.epa.gov/> and clicking the REGISTER A FACILITY button. For more information on registering a facility, refer to the "Facility Registration" section on the [Registration Instructions](#) page.

If you need assistance creating a user account or registering your facility, contact the [GHGRP Help Desk](#).

2. Notify the GHGRP Help Desk

Once the facility has been registered, notify the GHGRP Help Desk by email at ghgreporting@epa.gov indicating that your facility has been successfully registered in e-GGRT and that you intend to submit a BMM request. Be sure to include the facility's name and the facility's GHGRP ID number in the email.

The help desk will then create a Correspondence Issue in e-GGRT which will contain instructions on:

- a. the information you must include in the BMM request; and
- b. how to submit the BMM request in e-GGRT for your facility.

You will be notified by email once the Correspondence Issue has been created and is ready to be viewed in e-GGRT.

3. Submit the BMM Request

Using the EPA Correspondence Folder in e-GGRT to reply to the Correspondence Issue, you will enter and submit all of your BMM request information, including any attachments. The Correspondence Issue will contain detailed instructions on the information you must include in the BMM request as well as guidance on how to submit your request.

For more information on using the Correspondence Folder, see <http://www.ccdsupport.com/confluence/display/help/Correspondence+Tracking>



Please **DO NOT** submit BMM requests or any sensitive or confidential business information to the GHGRP Help Desk. BMM requests must be submitted via the EPA Correspondence Folder in e-GGRT. Anything you send to the help desk **may be made** available to the public.

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