Q171. If my refinery produces a product, feedstock or blendstock stream that is not listed in Table MM-1, how should I comply with the subpart MM reporting requirements? Am I required to use Calculation Method 2 to develop my own emission factor?

Q171. If my refinery produces a product, feedstock or blendstock stream that is not listed in Table MM-1, how should I comply with the subpart MM reporting requirements? Am I required to use Calculation Method 2 to develop my own emission factor?

A171. Reporters always have the option of using Calculation Method 1 if they so choose.

If the reporter chooses to use Calculation Method 1, they should consult the product definitions and select the most appropriate product listed in Table MM-1 for purposes of selecting a default factor for Calculation Method 1 and reporting volumes and other information required under §98.396. When evaluating your products, you should examine the definitions of the individual products listed in Table MM-1 that have corresponding default factors rather than the product category headings. So, for example, a reporter should look at the definitions for "miscellaneous products", "asphalt", and "residuum" (and any other product definitions that may be representative of the product) and decide which definition is most appropriate regardless of the end-use of the product. For a helpful summary of product definitions and emissions factors, see the Technical Support Document, Petroleum Products and Natural Gas Liquids: Definitions, Emission Factors, Methods and Assumptions, on the EPA Web site: http://www2.epa.gov/sites/production/files/2015-07/documents/subpartmmproductdefinitions.pdf (PDF) (33 pp, 353KB, About PDF).

If a reporter chooses to develop their own emissions factor for a product using Calculation Method 2, they must follow the procedures specified in §98.393 (f)(2) and 98.394(c).

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