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Client Alert

EPA Proposes to Add Sources to Greenhouse Gas Reporting System

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The U.S. Environmental Protection Agency (EPA) is proposing to require mandatory greenhouse gas (GHG) reporting from additional industry sectors, with monitoring beginning January 1, 2011. EPA finalized the original rule establishing mandatory greenhouse gas reporting requirements in October of 2009. That rule required 31 industry sectors to track and report their emissions. For more information on the original GHG reporting rule, click [here](#).

Now, in addition to those 31 industries, the agency is proposing to collect emissions data from the oil and natural gas sector, from facilities that inject and store carbon dioxide (CO₂) underground for the purposes of geologic sequestration or enhanced oil and gas recovery, and from certain industries that emit fluorinated gases – including certain electronics manufacturers, producers of fluorinated gas, importers and exporters of equipment pre-charged with fluorinated GHGs or containing fluorinated GHGs in closed-cell foams, and manufacturers and certain users of electric transmission and distribution equipment.

EPA is also proposing to require all facilities in the reporting system – those already covered by the rule and those that may be added to the system if the proposed rules become final – to provide information on their corporate ownership. Under these proposals, newly covered sources would begin collecting emissions data on January 1, 2011 with the first annual reports submitted to EPA on March 31, 2012.

The proposals will be open for public comment for 60 days after publication in the Federal Register. The agency will also hold public hearings on the proposals on April 19, 2010 in Arlington, Va. and April 20, 2010 in Washington, D.C.

Plews Shadley Racher & Braun LLP attorneys will continue to follow these developments.