Greenhouse Gas Reporting Program

Subpart RR: Geologic Sequestration of Carbon Dioxide

Subpart UU: Injection of Carbon Dioxide

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Updated 2/8/12

For a copy of the presentation slides, visit:

http://www.epa.gov/ghgreporting/reporters/training/index.html

Overview of Subparts RR and UU

- EPA has finalized greenhouse gas (GHG) reporting mechanisms for facilities that conduct geologic sequestration (subpart RR) and all other facilities that inject carbon dioxide (CO_2) underground for enhanced oil and gas recovery or any other purpose (subpart UU).
  - Proposal signed on March 22, 2010.
  - Final rule signed on November 22, 2010.

- This rule is complementary to and builds on EPA's Underground Injection Control (UIC) permit requirements

- On November 9, 2011 EPA finalized Technical Corrections, Clarifying and Other Amendments to seven subparts, including RR and UU.

Subparts RR/UU Rule Topics

I. Applicability – Who is Subject to Subparts RR and UU?

II. Subpart RR/UU Reporting, Calculation, and Monitoring Requirements

III. Estimating Missing Data

IV. Data Reporting and Recordkeeping

V. Subpart RR Monitoring, Reporting, and Verification (MRV) Plans

I. Applicability: Who is Subject to Subparts RR and UU?

What Facilities Must Report Under Subparts RR and UU?

Subpart RR

- Subpart RR source category includes:
  - Any well or group of wells that inject a CO_2 stream for long-term containment in subsurface geologic formations
  - All wells permitted as UIC Class VI wells
  - Facilities that conduct enhanced oil and gas recovery are not required to report geologic sequestration under subpart RR unless
    (1) the owner or operator chooses to opt-in to subpart RR or,
    (2) the facility holds a UIC Class VI permit for the well or group of wells used to enhance oil and gas recovery

Subpart UU

- Subpart UU source category includes:
  - Any well or group of wells that inject a CO_2 stream into the subsurface that does not report under Subpart RR

Facilities that report under subpart RR are not required to report under subpart UU

Subpart RR Exemption for R&D Projects

- R&D projects will be granted an exemption from subpart RR provided they meet the eligibility requirements
- A project is eligible for the exemption if it meets the subpart RR definition of R&D project:
  - *a project for the purpose of investigating practices, monitoring techniques, or injection verification, or engaging in other applied research, that will enable safe and effective long-term containment of a CO_2 stream in subsurface geologic formations, including research and short duration CO_2 injection tests conducted as a precursor to long-term storage*
- Projects receiving a subpart RR R&D exemption report under subpart UU.

Subpart RR R&D Exemption - Request

- A submission in support of an exemption as an R&D project must contain the following information:
  - The planned duration of CO_2 injection for the project
  - The planned annual CO_2 injection volumes during this time period
  - The research purposes of the project
  - The source and type of funding for the project
  - The class and duration of UIC permit or, for an offshore facility not subject to the Safe Drinking Water Act, a description of the legal instrument authorizing geologic sequestration

Subpart RR R&D Exemption - Process

- EPA will determine if a project meets the definition of R&D project within 60 days of receipt of the submission of a request for exemption.
  - Appeals are subject to 40 CFR part 78
- An R&D project that the Administrator determines is not eligible for the exemption must submit a proposed MRV plan to EPA within 180 days of the determination
  - A 180 day extension may be requested

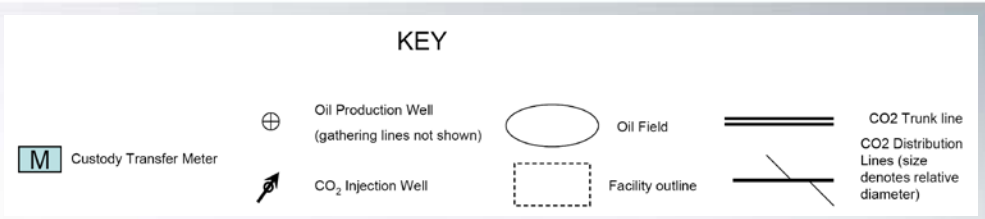
How is a Facility Delineated?

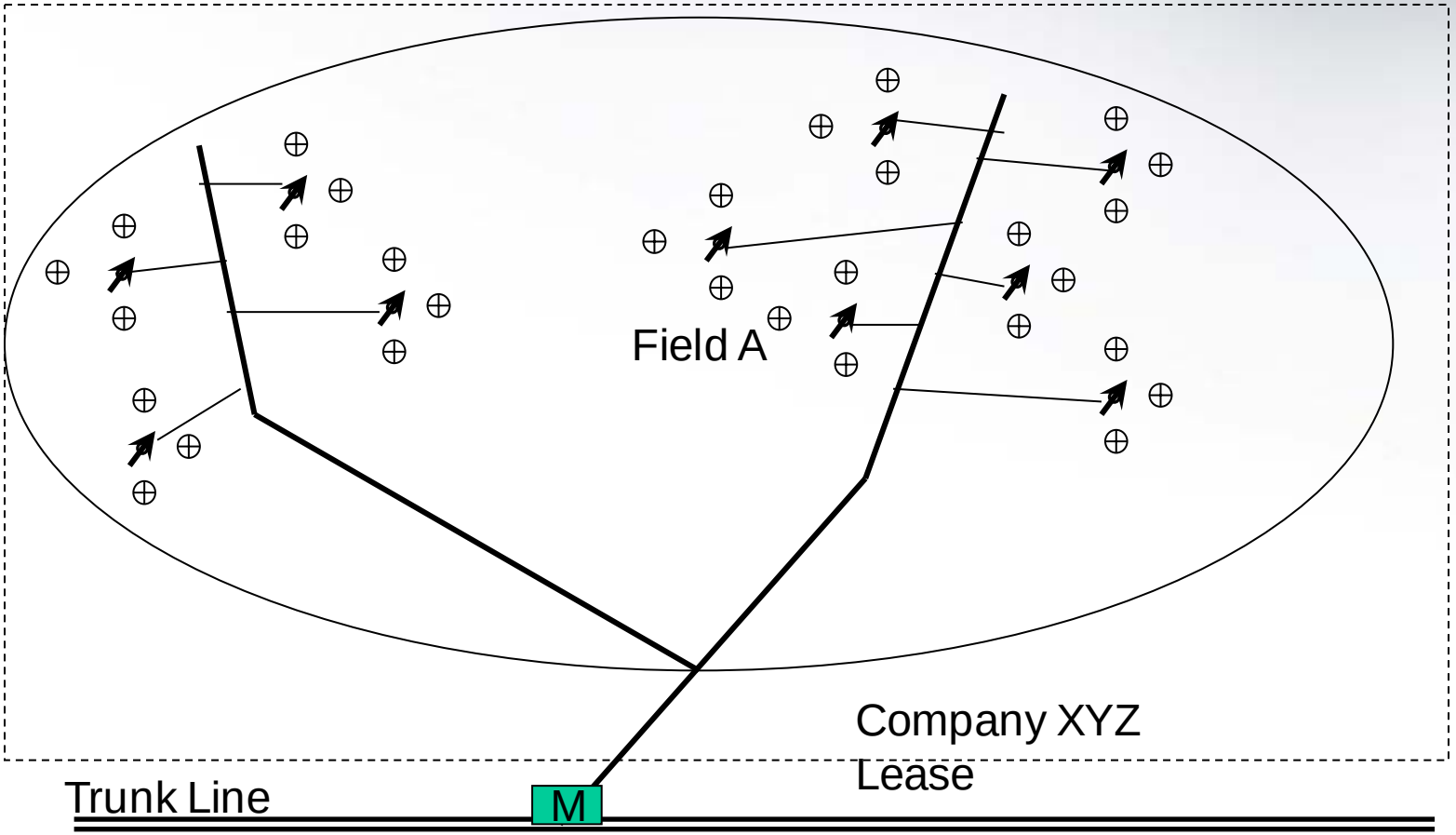
- Subparts RR/UU rely on the definition of facility in the general provisions of the GHG Reporting Program (subpart A)

- A facility is defined as…

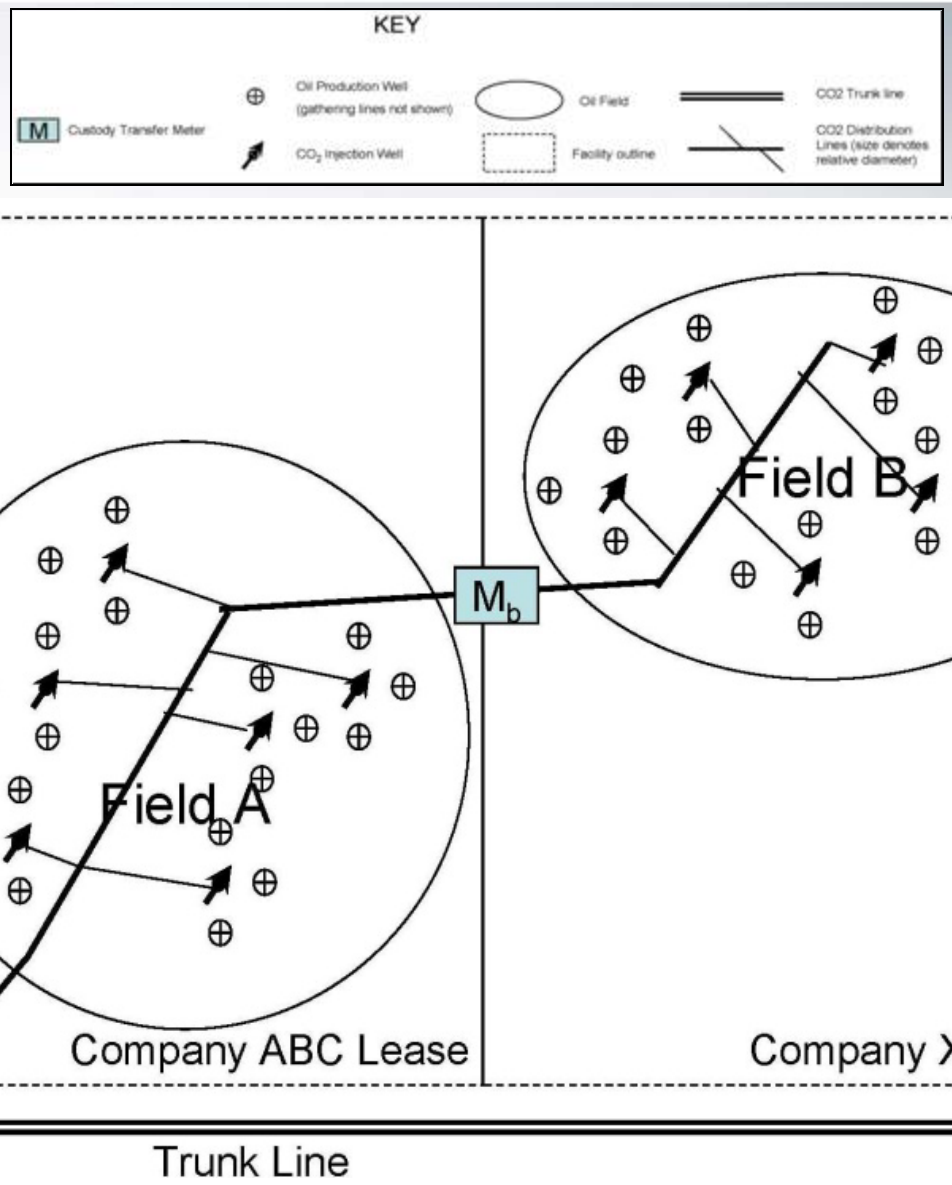
  – Physical property, plant, building, structure, source, or stationary equipment;
  – on contiguous or adjacent properties;
  – in actual physical contact or separated solely by public roadway or other public right of way; and
  – under common ownership or common control

Example Facilities





Example Facilities Cont'd



Reporting Threshold

- There is no reporting threshold for subparts RR/UU - both subparts are all-in source categories

Provisions to Cease Reporting

Subpart RR	Subpart UU
In order to cease reporting, a facility must: 1. Plug and abandon all well(s), **AND** 2. Submit a request that must contain either: a. For Class VI wells - a copy of the applicable UIC Director's authorization of site closure b. For non-Class VI wells and as an alternative for Class VI wells - a demonstration that current monitoring and model(s) show that the injected CO_2 stream is not expected to migrate in the future in a manner likely to result in surface leakage	A facility must continue to report unless either: 1.Mass of CO_2 received for injection is <25,000 metric tons/yr for 5 consecutive years 2.Mass of CO_2 received for injection is <15,000 metric tons/yr for 3 consecutive years

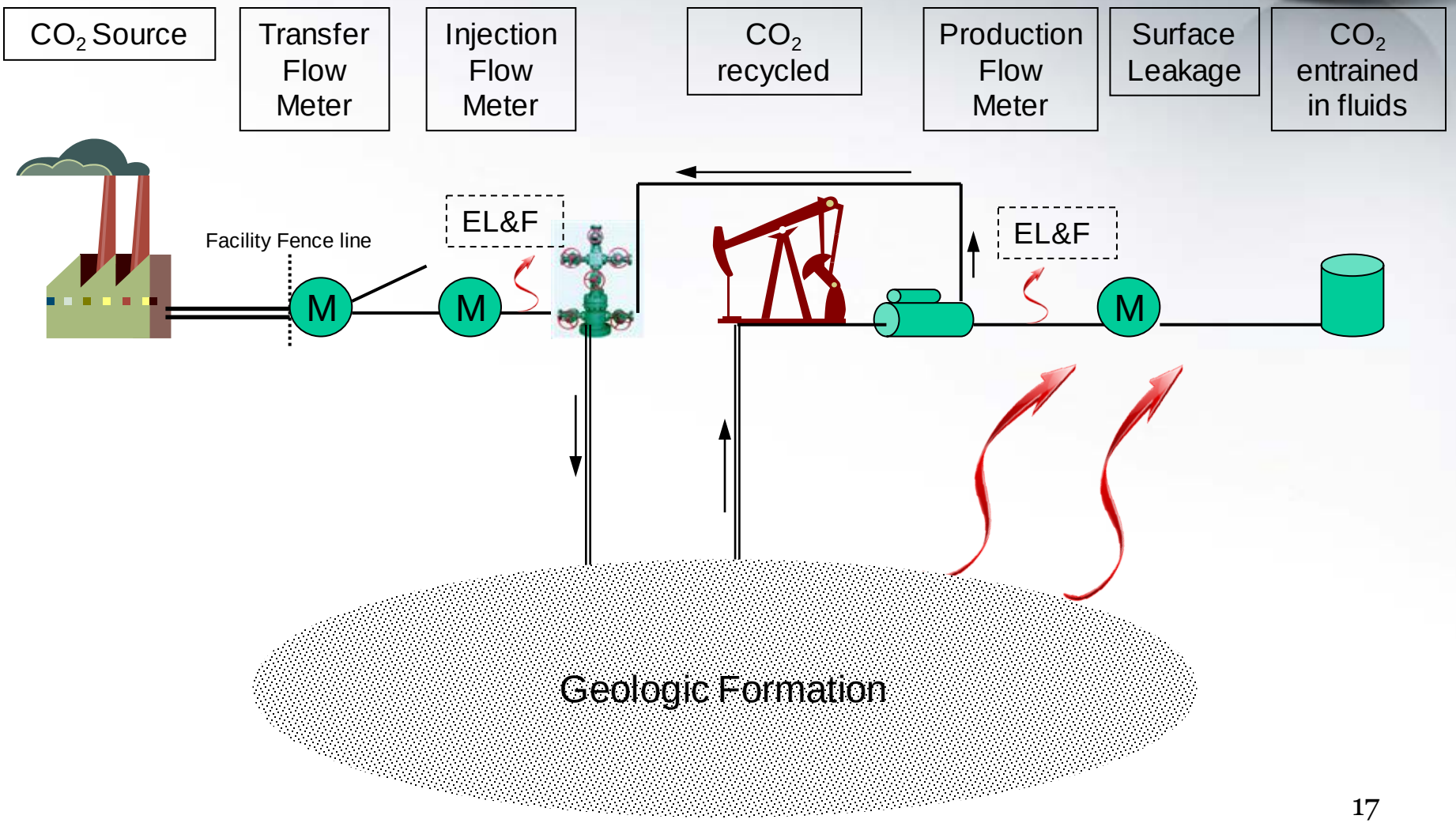
II. Subpart RR/UU Reporting, Calculation, and Monitoring Requirements

GHGs to be Reported

X denotes if a GHG must be reported under either subpart UU, RR, or both

	GHGs to be Reported	Subpart RR	Subpart UU
1	Mass of CO_2 received	X	X
2	Mass of CO_2 injected into the subsurface	X	
3	Mass of CO_2 produced	X	
4	Mass of CO_2 emitted by surface leakage	X	
5	Mass of CO_2 equipment leakage and vented CO_2 emissions from surface equipment located between the injection flow meter and the injection wellhead	X	
6	Mass of CO_2 equipment leakage and vented CO_2 emissions from surface equipment located between the production flow meter and the production wellhead	X	
7	Mass of CO_2 sequestered in subsurface geologic formations	X	
8	Cumulative mass of CO_2 reported as sequestered in subsurface geologic formations in all years since the facility became subject to reporting requirements under subpart RR	X	

Illustrative Example of GHGs to be Reported



Calculating CO_2 Received (Subparts RR and UU)

Depending on the measurement instrumentation at the facility and on the method in which CO_2 is received, Reporters may use any of these measurement options

- For CO_2 received in pipelines
  - A mass flow meter
  - A volumetric flow meter
- If a facility has more than one flow meter, the mass of CO_2 received must be summed over each flow meter
- For CO_2 received in containers
  - A mass measurement of the container contents
  - A volume measurement of the container contents

Calculating CO_2 Received (Subparts RR and UU)

Mass flow meter

$$CO_{2T,r} = \sum_{p=1}^{4} (Q_{r,p} - S_{r,p}) * C_{CO_{2,p,r}}$$ Eq. RR-1/UU-1

Volumetric flow meter

$$CO_{2T,r} = \sum_{p=1}^{4} (Q_{r,p} - S_{r,p}) * D * C_{CO_{2,p,r}}$$ Eq. RR-2/UU-2

$CO_{2T,r}$	Net annual mass of CO_2 received through flow meter r (metric tons)
$Q_{r,p}$	Quarterly mass flow through a receiving flow meter r in quarter p (metric tons)
$S_{r,p}$	Quarterly mass flow through a receiving flow meter r that is redelivered to another facility without being injected into your well in quarter p (metric tons)
D	Density of CO_2 at standard conditions (metric tons per standard cubic meter): 0.0018682
$CCO_{2,p,r}$	Quarterly CO2 concentration measurement in flow for flow meter r in quarter p (wt. percent CO_2, expressed as a decimal fraction).
p	Quarter of the year
r	Receiving flow meter

*For calculating CO_2 received in containers please refer to the subpart RR/UU regulation and TSD

CO_2 Received – Monitoring Requirements (Subparts RR and UU)

- **At the point of receipt:**
  - ***Flow:*** Measure flow rates at the receiving custody transfer meter prior to any subsequent processing operations at the facility and collect the flow rate quarterly
  - ***Concentration:*** Sample the CO_2 stream at a minimum of one time per quarter at the point of receipt and measure its CO_2 concentration

- **If ownership of the CO_2 was taken in a commercial transaction:**
  - ***Flow:*** Use the quarterly flow rate data from the sales contract if it is a one-time transaction or from invoices or manifests if it is an ongoing commercial transaction with discrete shipments
  - ***Concentration*** (if sales contract was contingent on CO_2 concentration): use the CO_2 concentration data from the sales contract for that quarter if the supplier of the CO_2 sampled the CO_2 stream in a quarter and measured its concentration per the sales contract terms

CO_2 Received – Monitoring Requirements (Subparts RR and UU)

- **If CO_2 is injected from a production process unit that is part of the facility:**
  - ***Flow:*** Use the quarterly CO_2 flow rate that was measured at the equivalent of a custody transfer meter following procedures provided in subpart PP
  - ***Concentration:*** use the quarterly CO_2 concentration that was measured and reported in accordance with subpart PP

*For monitoring requirements for CO2 received in containers please refer to the subpart RR/UU regulatory text and TSD.

CO_2 Received – Source (Subparts RR and UU)

- For all CO_2 received facilities must monitor and record the source of the CO_2 by category, if known
- Categories include:
  (1) CO_2 production wells
  (2) Electric generating unit
  (3) Ethanol plant
  (4) Pulp and paper mill
  (5) Natural gas processing
  (6) Gasification operations
  (7) Other anthropogenic source
  (8) Discontinued enhanced oil and gas recovery project
  (9) Unknown

Calculating CO_2 Injected (Subpart RR)

Mass flow meter

$$CO_{2,u} = \sum_{p=1}^{4} Q_{p,u} * C_{CO_{2,p,u}} \qquad \text{Eq. RR-4}$$

Volumetric flow meter

$$CO_{2,u} = \sum_{p=1}^{4} Q_{p,u} * D * C_{CO_{2,p,u}} \qquad \text{Eq. RR-5}$$

$CO_{2,u}$	Annual CO_2 mass injected (metric tons) as measured by flow meter u
$Q_{p,u}$	Quarterly mass flow rate measurement for flow meter u in quarter p (metric tons per quarter)
D	Density of CO2 at standard conditions (metric tons per standard cubic meter): 0.0018682
$C_{CO2,p,u}$	Quarterly CO_2 concentration measurement in flow for flow meter u in quarter p (wt. percent CO_2, expressed as a decimal fraction)
p	Quarter of the year
u	Flow meter

CO_2 Injected – Monitoring Requirements (Subpart RR)

- Point of flow measurement must be:
  - Where the CO_2 stream(s) is representative of the CO_2 stream(s) being injected; or
  - The measurement location used to comply with the UIC permit for the well(s) at the facility
- Point of concentration measurement must be immediately upstream or downstream of the flow meter used to measure flow rate of that CO_2 stream and measure the CO_2 concentration of the sample

Calculating CO_2 Produced (Subpart RR)

Mass flow meter $CO_{2,w} = \sum_{p=1}^{4} Q_{p,w} * C_{CO_{2,p,w}}$ Eq. RR-7

Volumetric flow meter $CO_{2,w} = \sum_{p=1}^{4} Q_{p,w} * D * C_{CO_{2,p,w}}$ Eq. RR-8

$CO_{2,u}$	Annual CO_2 mass produced (metric tons) through separator w
$Q_{p,u}$	Quarterly mass flow rate measurement for separator w in quarter p (metric tons per quarter)
D	Density of CO_2 at standard conditions (metric tons per standard cubic meter): 0.0018682
$C_{CO2,p,u}$	Quarterly CO_2 concentration measurement in flow for separator w in quarter p (wt. percent CO_2, expressed as a decimal fraction)
p	Quarter of the year
w	Separator

Calculating CO_2 Produced (Subpart RR)

- The amount of CO_2 produced must be summed over all flow meters at the facility used to measure CO_2 production
- The total CO_2 measured at the separator(s) represents a percentage of the total CO_2 produced

$$CO_{2P} = (1+X) * \sum_{w=1}^{W} CO_{2,w} \qquad \text{Eq. RR-9}$$

CO2p	Total annual CO2 mass produced (metric tons) through all separators in the reporting year
X	Entrained CO2 in produced oil or other fluid divided by the CO2 separated through all separators in the reporting year (weight percent CO2, expressed as a decimal fraction)
CO2w	Annual CO2 mass produced (metric tons) through separator w in the reporting year
w	Separator

- X would be determined using a method specified in the Reporter's EPA approved site-specific MRV plan (to be discussed in more detail)

CO_2 Produced – Monitoring Requirements (Subpart RR)

- Point of measurement of flow of CO_2 produced must be a flow meter directly downstream of each separator that sends a stream of gas into a recycle or end use system
- Point of concentration measurement must be immediately upstream or downstream of the flow meter used to measure flow rate of that CO_2 stream and measure the CO_2 concentration of the sample

Calculating CO_2 Emitted by Surface Leakage (Subpart RR)

$$CO_{2E} = \sum_{x=1}^{X} CO_{2,x} \qquad \text{Eq. RR-10}$$

CO_{2E}	Total annual CO_2 mass emitted by surface leakage (metric tons) in the reporting year
$CO_{2,x}$	Annual CO_2 mass emitted (metric tons) at leakage pathway x in the reporting year
X	Leakage pathway

- Surface leakage is the movement of the injected CO_2 stream from the injection zone to the surface, and into the atmosphere, indoor air, oceans, or surface water
- The mass of CO_2 emitted through each leakage pathway (x) will be determined in accordance with the Reporter's EPA approved site-specific MRV plan (to be discussed in more detail)

Equipment Leaks and Vented Emissions

- For equipment leaks and vented emissions, follow the monitoring and QA/QC requirements specified in subpart W (Oil and Natural Gas Systems) for the equipment located on the surface, either:
  - Between the flow meter used to measure injection quantity and the injection wellhead, or
  - Between the flow meter used to measure production quantity and the production wellhead

Calculating CO_2 Sequestered (Subpart RR)

Facilities actively producing oil or other fluids $CO_2 = CO_{2I} - CO_{2P} - CO_{2E} - CO_{2FI} - CO_{2FP}$ ***Eq. RR-11***

Facilities NOT actively producing oil or other fluids $CO_2 = CO_{2I} - CO_{2E} - CO_{2FI}$ ***Eq. RR-12***

CO_2	Total annual CO2 mass sequestered in subsurface geologic formations (metric tons) at the facility in the reporting year
CO_{2I}	Total annual CO2 mass injected (metric tons) in the well or group of wells covered by this source category in the reporting year
CO_{2P}	Total annual CO2 mass produced (metric tons) in the reporting year
CO_{2E}	Total annual CO2 mass emitted (metric tons) by surface leakage in the reporting year
CO_{2FI}	Total annual CO2 mass emitted (metric tons) as equipment leakage or vented emissions from equipment located on the surface between the flow meter used to measure injection quantity and the injection wellhead, for which a calculation procedure is provided in subpart W
CO_{2FP}	Total annual CO2 mass emitted (metric tons) as equipment leakage or vented emissions from equipment located on the surface between the production wellhead and the flow meter used to measure production quantity, for which a calculation procedure is provided in subpart W

Subparts RR/UU Measurement Device Monitoring Requirements

- Operate all flow meters continuously - except as necessary for maintenance and calibration.
- Flow meters must be calibrated according to requirements in the general provisions (subpart A)
- Flow meters must be operated using one of the following:
  - An appropriate standard method published by a consensus-based standards organization, if such a method exists; or
  - An industry standard practice
- All flow meter calibrations performed must be National Institute of Standards and Technology (NIST) traceable

Subparts RR/UU General Monitoring Requirements

- The concentration of any CO_2 quantity must be measured according to one of the following:
  - An appropriate standard method published by a consensus-based standards organization, if such a method exists, such as:
    - Gas Processors Association (GPA) Standard 2261-00. Analysis for Natural Gas and Similar Gaseous Mixtures by Gas Chromatography
    - GPA Standard 2177-03. Analysis of Natural Gas Liquid Mixtures Containing Nitrogen and Carbon Dioxide by Gas Chromatography
    - ASTM E1747-95 (re-approved 2005). Purity of Carbon Dioxide Used in Supercritical Fluid Applications
  - An industry standard practice
- All measured volumes of CO_2 must be converted to standard conditions, where the standard temperature and pressure conditions are a temperature of **60 degrees Fahrenheit** and an absolute pressure of **1 atmosphere**

III. Estimating Missing Data

Available Missing Data Procedures

Measured Parameter	Missing Data Procedure	Applicable Subpart(s)
Quarterly flow rate	If none of the provided methods for obtaining this parameter are feasible, use a representative flow rate value from the nearest previous time period	Subpart RR Subpart UU
Quarterly mass of volume of CO_2 container contents	If none of the provided methods for obtaining this parameter are feasible, use a a representative mass or volume value from the nearest previous time period	Subpart RR Subpart UU
Quarterly CO_2 concentration	If none of the provided methods for obtaining this parameter are feasible, use a representative concentration value from the nearest previous time period	Subpart RR Subpart UU
Quarterly quantity of CO_2 injected	Use a representative quantity of CO_2 injected from the nearest previous period of time at a similar injection pressure	Subpart RR
CO_2 equipment leakage and vented CO_2 emissions	Follow subpart W missing data procedures	Subpart RR

Available Missing Data Procedures Cont'd

Measured Parameter	Missing Data Procedure	Applicable Subpart(s)
Quarterly quantity of CO_2 produced	Use a representative quantity of CO_2 produced from the nearest previous period of time	Subpart RR
Mass of CO_2 emitted by surface leakage	Use procedures in the EPA approved site-specific MRV plan	Subpart RR
Other missing data	Use procedures in the EPA approved site-specific MRV plan	Subpart RR

IV. Data Reporting and Recordkeeping

Subpart UU Reporting Requirements

- Information required by 98.3(c)(1)-(3), and 98.3(c)(5)-(9) of subpart A
- All inputs and results of calculations required for subpart UU
- All standards or methods used to measure parameters for calculations in subpart UU
- The number of times missing data procedures were used for any parameters for which missing data procedures are provided
- The types of flow meters used for measurements at the facility
- The source of the CO_2 received

Subpart RR Reporting Requirements

- Information required by 98.3(c)
- All inputs and results of calculations required for subpart RR
- All standards or methods used to measure parameters for calculations in subpart RR
- The number of times missing data procedures were used for any parameters for which missing data procedures are provided
- The source of the CO_2 received
- For flow meters
  - The types of flow meters used for measurements at the facility
  - Flow meter numerical identifications
  - CO_2 injection flow meter locations

Subpart RR Reporting Requirements Cont'd

- Date the most recent MRV plan was approved by EPA, and the approval number
- For UIC permitted wells
  - The well ID number used for the UIC permit
  - The UIC permit class
- For offshore wells
  - Any well ID number
  - Any ID number used for the legal instrument authorizing geologic sequestration
- Numerical identifiers for all leakage pathways in the event of surface leakage
- Annual Monitoring Reports, including:
  - Narrative history of monitoring efforts
  - Non-material changes to the MRV Plan
  - Narrative history of monitoring anomalies
  - Description of surface leakage of CO_2, if any

Recordkeeping Requirements (Subparts RR and UU)

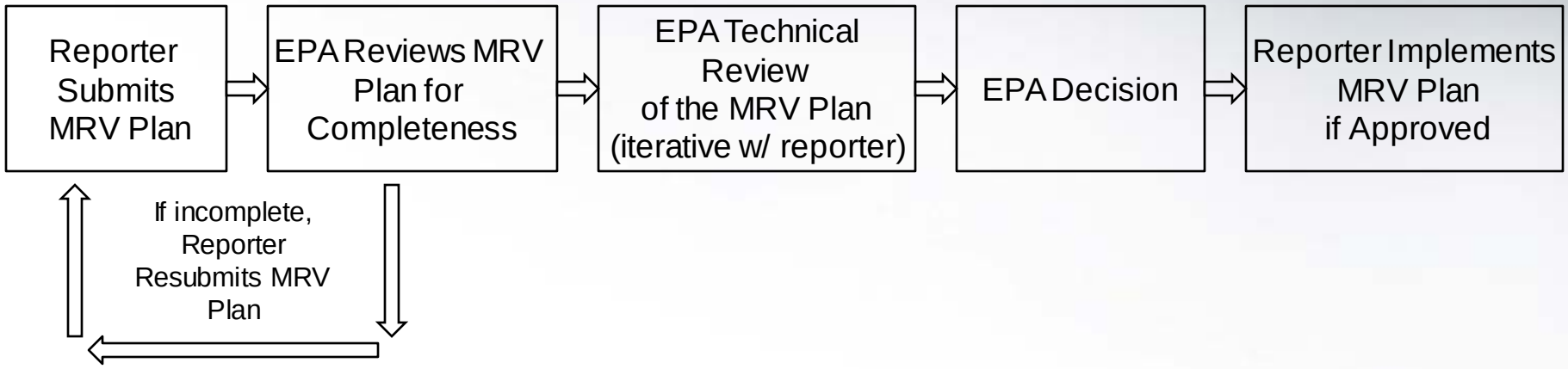
- You must retain all required records for at least 3 years.

Recordkeeping Element	Subpart RR	Subpart UU
Information required by 98.3(g) of subpart A	X	X
Quarterly records of CO_2 received, including all parameters measured to calculate CO_2 received	X	X
Quarterly records of CO_2 injected, including all parameters measured to calculate CO_2 injected	X	
Quarterly records of CO_2 produced, including all parameters measured to calculate CO_2 produced	X	
Information used to calculate the CO_2 emitted by surface leakage from leakage pathways	X	
Information used to calculate CO_2 emitted as equipment leakage or vented emissions	X	
Other records specified in EPA approved site-specific MRV plans	X	

X denotes if a recordkeeping element must be maintained under either subpart RR, UU, or both.

V. Subpart RR Geologic Sequestration Monitoring, Reporting, and Verification (MRV) Plan

MRV Plan Review



Note: MRV plan resubmittals follow the same process

Contents of MRV Plan

- Delineation of the maximum monitoring area (MMA) and active monitoring areas (AMAs)
- Identification of potential surface leakage for pathways in the MMA
- A strategy for detecting and quantifying surface leakage of CO_2
- A strategy for establishing the expected baseline for monitoring CO_2 surface leakage
- Site-specific variables for the mass balance equation
- Well ID number(s)
  - For UIC permit holders and permit applicants – well ID number(s)
  - For offshore wells not subject to SDWA - any well(s) ID number(s) and any ID(s) used for the legal instrument authorizing geologic sequestration
- Proposed date to begin collecting data for calculating total amount sequestered (Eqs RR-11 and RR-12)
  - Date must be after expected baselines are established and the leakage detection and quantification strategy is implemented in the initial AMA

Maximum Monitoring Area (MMA)

- **Maximum monitoring area** is the area expected to contain the free phase CO_2 plume until the CO_2 plume has stabilized plus an all-around buffer zone of at least one-half mile
  - Additional buffer area may be needed depending on subsurface features
  - Initially determined from predictive models

Active Monitoring Area (AMA)

- **Active monitoring area** is the area that will be monitored over a specific time interval from the first year of the period (n) to the last year in the period (t).
  - This allows operators to phase in monitoring so that during any given time interval, only that part of the MMA in which leakage might occur needs to be monitored.
- The boundary of the active monitoring area is established by superimposing two areas:
  1. The area projected to contain the free phase CO_2 plume at the end of year t, plus an all around buffer zone of one-half mile or greater if known leakage pathways extend laterally more than one-half mile.
  2. The area projected to contain the free phase CO_2 plume at the end of year t+5.

Potential Leakage Pathways

- MRV plan must identify the likelihood, magnitude, and timing of potential leakage from each pathway
- Example pathways:
  - Wells
    - Injection well(s)
    - Monitoring wells
    - Active/abandoned oil and gas wells
  - Faults, fractures, and bedding plane partings
  - Confining zone competency, extent and dip

Leakage Detection Strategy

- Leakage detection systems may include
  - Continuous measurements (e.g., injection well, IZ/ACZ pressure in monitoring wells) or,
  - Regular periodic surveys (water chemistry, airborne surveys, MIT)
- Detection capability should be described in the MRV plan
- Considerations could include:
  - Resolution, accuracy, precision, areal coverage, and time for leak to reach measurement point
  - The ability for the monitoring method to discriminate expected conditions from potential leaks

Leakage Verification Strategy

- Leakage verification allows reporter to confirm the location and source of leakage that has been detected
- MRV plan may describe the methods and criteria for determining how an anomalous reading or condition will be evaluated to determine if it represents a leak, and to verify the location and source of the leak
- Examples:
  - Taking a second measurement with a redundant device or a different device of higher accuracy or precision,
  - Using a denser sample grid or taking more frequent measurements

Leakage Quantification Strategy

- MRV plan must include a discussion of how leaks will be quantified once they are detected and verified
- Multiple monitoring technologies and quantification techniques can address different leakage pathways and leakage calculation methods
- Description of strategy should include:
  - The methods and expected accuracy of the quantification techniques
  - Distinguishing leakage from expected baseline

Strategy for establishing the expected baseline

- Expected baselines allow the reporter to discern whether the results of monitoring are attributable to leakage of injected CO_2
- Parameters may be environmental such as subsurface pressure, soil flux rates, etc., or operational, such as the injection pressure and the annular pressure in the well
- The MRV plan should describe how the baselines will be determined and how they could be used to detect monitoring anomalies

Entrained CO_2 in produced fluids

- Fluids produced at GS facilities may contain CO_2 that is not captured in the gas phase CO_2 measurement downstream of the gas-liquid separator
  - Dissolved gas in the oil or water phase of the produced fluids
  - Dissolved in water extracted from the IZ
- Equation RR-9 describes the mass balance of CO_2 at the gas-liquid separator including amount of CO_2 in the produced oil and water
  - In the MRV plan, the reporter should estimate the percentage of entrained CO_2 in produced oil or other fluid
  - For example, this can be determined using industry standard laboratory analyses

When Does Reporting Begin?

- Subpart RR
  - Submit annual reports to EPA by September 28, 2012 reporting basic information on CO_2 received in 2011.
  - Once EPA-approved MRV plan is implemented, add data to annual reports on the amount of CO_2 that is geologically sequestered based on mass balance approach and annual monitoring activities.
- Subpart UU
  - Submit annual reports to EPA by September 28, 2012 reporting basic information on CO_2 received in 2011.

Subpart RR Schedule

- Facilities that are subject to Subpart RR must submit a proposed MRV plan, MRV plan submission extension request, or R&D exemption request according to the following schedule:

Date that the well or group of wells were issued final UIC permit:	**e-GGRT Certificate of Representation (COR) submittal due:**	**Proposed MRV plan, MRV plan submission extension request, R&D exemption request due to EPA:**
On or before December 31, 2010	By May 1, 2011	By June 30, 2011 (180 day extension allowed)
On or after January 1, 2011	60 days prior to submission of proposed MRV plan, MRV plan extension request, or R&D exemption request (whichever is earliest)	Within 180 days of receiving UIC permit

- See Slide 6 for determining applicability to Subpart RR

More Information

Website

- For more information, visit EPA's website at: http://www.epa.gov/ghgreporting/reporters/index.html
  - Implementation information for each subpart
  - FAQs
  - Preamble and rule
  - Technical background documents on source categories
  - Comment response documents
  - Training and Webinar schedule
  - Other technical assistance materials
  - Hotline
- For a copy of these slides, visit: http://www.epa.gov/ghgreporting/reporters/training/index.html