

U.S. Department of Energy Idaho Operations Office

Idaho National Laboratory (INL) Site Greenhouse Gas (GHG) Monitoring Plan - 40 CFR 98

July 2010



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Prepared for the U.S. Department of Energy DOE Idaho Operations Office

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1. PURPOSE, SCOPE, and APPLICABILITY

The purpose of this Greenhouse Gas (GHG) Monitoring Plan is to meet the monitoring plan requirements of Title 40 of the Code of Federal Regulations Part 98.3(g)(5). This GHG Monitoring Plan identifies procedures and methodologies used at the Idaho National Laboratory Site (INL Site) to collect data used for GHG emissions calculations and reporting requirements from stationary combustion and other regulated sources in accordance with 40 CFR 98, Subparts A and other applicable subparts. INL Site Contractors determined subpart applicability through the use of a checklist (Appendix A). Each facility/contractor reviews operations to determine which subparts are applicable and the results are compiled to determine which subparts are applicable to the INL Site. This plan is applicable to the 40 CFR 98-regulated activities managed by the INL Site contractors: Idaho National Laboratory (INL), Idaho Cleanup Project (ICP), Advanced Mixed Waste Treatment Project (AMWTP), and Naval Reactors Facilities (NRF).

2. ROLES AND RESPONSIBILITIES

Data collection in accordance with this GHG Monitoring Plan will be completed by assigned coordinators (Table 1) from each of the INL Site contractors and consolidated into the annual Site GHG Emissions Report by designated INL resources. INL will submit a Sitewide report to the Department of Energy – Idaho (DOE-ID) for submittal to the U.S. Environmental Protection Agency (EPA) - Region 10 by March 31st of each year for the previous calendar year. Each point of contact will obtain certification from the appropriate certifying official.

Table 1: Roles and Responsibilities

DOE-ID and INL Site Contractor Points of Contact (Positions)	Responsibility
DOE-ID: Designated representative for INL Site	INL Site Annual GHG Emission Report certification, signing, and submittal to Region 10 of EPA. Transmittal to EPA Region 10 no later than March 31st of each year.
INL: INL Air Permitting and Reporting Lead	Develop a reporting and deliverable schedule and distribute by December 1 st of current reporting year. Review INL operations to determine which subparts are applicable during annual review of GHG Monitoring Plan. Data collection and contractor data certification for the INL Site. INL Site report preparation, contractor certification
	and submittal to DOE-ID. Report submitted to DOE-ID no later than March 1 st .
AMWTP: Environmental Engineering Lead, Air	Review AMWTP operations to determine which subparts are applicable during annual review of GHG Monitoring Plan. Data collection, contractor data certification, and transmittal of AMWTP information to INL contractor per annual schedule.

DOE-ID and INL Site Contractor Points of Contact (Positions)	Responsibility		
ICP: ICP Air Quality Technical Representative	Review ICP operations to determine which subparts are applicable during annual review of GHG Monitoring Plan. Data collection, contractor data certification, and transmittal of ICP information to INL contractor per annual schedule.		
NRF: Environmental Engineering, Air	Review NRF operations to determine which subparts are applicable during annual review of GHG Monitoring Plan. Data collection, contractor data certification, and transmittal of NRF information to INL contractor per annual schedule.		

Each facility/contractor at the INL Site is responsible for collecting fuel use and emission information as required in 40 CFR 98.3, submitting certified data for each of their sources to the INL Environmental Support and Services for rollup into a single report submission for the INL Site, and maintaining appropriate data support records as described in 40 CFR 98.36 - 37.

The reporting period for the Annual INL Site GHG Emissions Report is from January 1 through December 31 of each calendar year. The deliverable will consist of a consolidated INL compliance certification of individual facility/contractor compliance of GHG emission monitoring data and supporting documentation. Each facility/contractor will monitor and report their applicable fuel use and emissions data from their applicable stationary combustion sources, including accounting for missing data information and calculating estimates. Monitoring data will be certified and submitted to INL contractor Environmental Support and Services Directorate by February 15th, for roll up of the INL Site monitoring data. DOE-ID will certify the consolidated report as required by regulation and transmit to EPA Region 10

3. PROCESSES AND METHODOLOGIES USED TO COLLECT DATA FOR GHG CALCULATIONS

The INL Site will be using Tier I calculation methodologies for reporting GHG emissions from stationary fuel combustion sources. The data to be collected for the Tier I calculations for stationary sources subject to 40 CFR 98 consist primarily of the following information records (Table 2). These records are created, collected, and managed according to INL Site contractor-specific controlled procedures. These contractor-specific documents and procedures include operation specific procedures and maintenance procedures/preventative maintenance work orders and applicable environmental and chemical management procedures. The contractor-controlled documents include applicable quality assurance and record keeping requirements and implementation instructions for compliance with 40 CFR 98. Contractors will supply supporting documentation that includes a list of reference documents/procedures used to collect data for generation of the Annual INL Site GHG Emissions Report.

Table 2: GHG Data Collection for Annual INL Site GHG Emission Reporting

Stationary Source Unit Type	Fuel Use Information
Boilers (Diesel, Propane)	Individual unit meters (fuel usage meters),
	Fuel delivery receipts
Generators, Compressors, Pumps (non-emergency,	Individual fuel usage or run time unit meters,
non-portable, diesel, propane, or gasoline)	Fuel delivery receipts
Small heater/building units (propane): (i.e.: space	Fuel delivery receipts
heating, hot water heaters)	•
Incinerator (solid biomass fuel)	Individual unit meters (fuel usage meters)

According to 40 CFR 98.36(c)(1), data collected from each stationary source or aggregated source for the annual INL Site GHG Emission Report shall include:

- Unit/Group identification number(s);
- Code representing type of unit;
- Maximum heat input rating in million British Thermal Units per hour (MMBTU/hr) (for boilers and process heaters only);
- Cumulative maximum rated heat input capacity of the group (if aggregating units);
- Relative units of measure for other combustion sources (i.e.: HP rating, BTU rating);
- Customer meter number (for any units that combust natural gas);
- Type of fuel combusted; and
- Annual calendar year amount of fuel combusted (in gallons for liquids, short tons for solids, and standard cubic feet for gaseous).

According to 40 CFR 98.36(c)(1), the INL Site may use aggregation of units as an alternative to reporting GHG emissions from individual units. In order to aggregate emissions, the INL Site must contain two or more units, each of which has a maximum rated heat input capacity of 250 MMBTU/hr or less. Data can be collected by a group of units, rather than by each individual unit.

Each year facility/contractor data packages will be submitted to INL Environmental Support and Services Directorate by the second Thursday in February. An electronic file containing the reporting data and attachments should be provided to the INL Air Permitting and Reporting Lead with INL Environmental Support and Services for compiling the data into the Annual INL Site GHG Emissions Report.

Certification Statement

GHG emission report submittals will be certified in accordance with respective contract requirements to the INL Environmental Support and Services Directorate. Each facility/contractor will certify that the data is true, accurate and complete to the best of their knowledge (see Appendix B example).

3.1 Estimating Missing Data

In the event of missing data, the following approaches will be used to estimate missing data values.

Individual Unit Meters

If individual unit meters malfunction or are not within calibration, fuel usage calculations will be made from the best available information, such as:

- 1. Available fuel receipt information (for units with dedicated supply/storage tanks)
- 2. Recorded equipment operation hour run times, size of each combustion unit, and manufacturer information on hourly consumption rate at identified loading. Manufacturer information will be consulted to determine fuel consumption from horsepower (hp) ratings, if applicable. If no manufacturer information is available, average fuel usage data will be used.

Fuel Delivery Receipts

If fuel delivery receipts are unavailable or missing for a particular delivery, estimates of fuel usage will be made from the best available information, such as:

- 1. Average of fuel receipt deliveries for the specific unit for the reporting period, in the case of missing receipts from a particular delivery, or
- 2. Recorded equipment operation hour run times and manufacturer information on hourly consumption rate at identified loading.

4. QUALITY ASSURANCE/MAINTENANCE

There are no monitoring and quality assurance/quality control requirements identified in 40 CFR 98.34 for Tier I calculations; therefore, ensuring facility/contractor data quality and maintaining and calibrating measurement devices in accordance with manufacturer's recommendations satisfy the quality assurance criteria for this INL Site GHG Monitoring Plan. As previously identified, supporting documentation will be provided that identifies procedures used to collect data for the annual INL Site GHG Monitoring Report. In accordance with 40 CFR 98.3(h)(i)(1), the facility/contractor will ensure the quality of the data used for GHG emissions calculations by properly calibrating and maintaining fuel meter measurement devices in accordance with manufacturer's recommendations and the fuel meter measurement devices must be calibrated to an accuracy of five percent. Information provided in INL Site contractor data submittals will be contractor certified as being true, accurate and complete, having been prepared in accordance with all applicable requirements.

5. MONITORING PLAN REVISIONS

As described in 40 CFR 98.3(g)(5)(iii), revisions to this INL Site GHG Monitoring Plan will be made as necessary to reflect changes in production processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime. Per DOE-ID requirements, the INL Site GHG Monitoring Plan will be reviewed annually (last quarter of calendar year).

6. RECORDS

In accordance with 40 CFR 98.3(g)(5)(iv), "[u]pon request by the [EPA], the owner or operator shall make all information that is collected in conformance with the INL Site GHG Monitoring Plan available for review during an audit. Electronic storage of the information in the plan is permissible, provided that the information can be made available in hard copy upon request during an audit."

According to 40 CFR 98.3(g), records required to be maintained for a minimum of three years include:

- Procedures used to ensure the accuracy of the estimates of fuel usage and boiler efficiency (as applicable, per 40 CFR 98.34(g))
- Unit Fuel usage meter data, as applicable
- Unit Fuel delivery receipts, as applicable
- Unit Combustion source operational run times, as applicable
- Missing Data Calculations, as applicable
- Unit Fuel meter calibration and maintenance records, as applicable
- Annual Site contractor data submittals, with contractor certifications
- Annual Site GHG Emissions Report and transmittals, with certifications

7. REFERENCES

40 CFR 98, Subparts A and C, "General Stationary Fuel Combustion Sources." Environmental Protection Agency, Code of Federal Regulations, current issue.

Appendix A

GHG Source Applicability Checklist

Gree	nhouse Gas	Monitoring Plan - S	ource Ap	olicabilit	y Deteri	<u>mina</u> 1	ion Checklist	Date:	
C	ontractor:			Facility	y/Bldgs:				
Do any	y of your facili le and emergency	ties operate non-electric equipment are exempt from	c stationary reporting req	combusti uirements)	on source	57 (40	CFR 98 Subpart C)	Yes	□No
	If yes, mark fu	el types used:	Diesel		Gasolin	e	Propane	Natural Gas	☐ Biomass
,		If other, plea	se list:						
	If yes, mark ed	quipment types used:	General	or [Boiler] Water/ Space Heate	er 🔲 Furnace	Incinerator
		If other, plea	se list:						
Do an	v of your facili	ties operate electricity o	eneration (ınits subje	ect to the	requir	ements of the		
Acid R	ain Program c	or required to monitor a	nd report C	O ₂ emissio					
(portab	le and emergency	equipment are exempt from	reporting req	uirements)				Yes	□ No
Do an	y of your facili	ties produce adipic acid	l using oxid	ation? (40	CFR 98 Su	bpart .	E)	Yes	□ No
		ties manufacture prima nental cells or research and d				rt F)		Yes	□ No
Do an	y of your facili	ties operate ammonia r	nanufacturi	ng proces	s units? (4	10 CFR	98 Subpart G)	Yes	☐ No
Do an	y of your facili	ties manufacture portla	nd cement	(40 CFR 9	8 Subpart	H)		Yes	☐ No
ferron		ties produce ferroalloys on, ferrotitanium, ferro)						al)?	□ No
Do an	v of vour facili	ties manufacture flat gl	ass, contain	er alass, p	ressed or	blowr	glass, or wool		
		98 Subpart N) (does not inc						Yes	No
Do an	y of your facili	ties produce HCFC-22 a	nd/or destr	uct HFC-2	3? (40 CFF	198 Su	bpart O)	Yes	☐ No
Do an	y of your facili	ties produce hydrogen	gas sold as	a product	to other	entitie	s? (40 CFR 98 Subpart	P) Yes	☐ No
Do an	y of your facili	ties produce iron and st	teel? (40 CFI	98 Subpa	rt Q)		-	Yes	□ No
Do an	y of your facili	ties operate as primary	or seconda	y lead sm	elters? (4	CFR 9)8 Subpart R)	Yes Yes	☐ No
Do an	y of your facili m hydroxide,	ties manufacture lime p hydrated lime, dolomiti	oroducts (e.c	3. calcium , dolomitie	oxide, hig c hydrate	jh-cak)? (40 (tium quicklime, CFR 98 Subpart S)	Yes	☐ No
Do an	y of your facili	ties produce magnesiu or rolling operations? (-	m or use mo	lten mag	nesium in	alloyi	ng, casting, drawing	☐ Yes	□ No
Do an	y of your facili	ties operate equipment odochrosite, or sodium	that uses c	arbonates	(limesto	ne, ma	gnesite, dolomite,	Yes	□ No
		ties produce nitric acid						Yes	□ No
		ities produce petrocher ene, ethylene dichloride						Yes	☐ No
		ties operate as a petrol						Yes	□No
		ties operate a wet-proc					(40 CFR 98 Subpart Z) Yes	□ No
-		ties manufacture pulp						Yes	No
		ities produce silicon car					8 Subpart BB)	Yes	□ No
ļ		ities manufacture soda					 	Yes	No
<u> </u>	<u></u>	ities produce titanium c						Yes	□No

Greenhouse G	as Monitoring Plan - Source Applicability Determination Checklist (cont	<u>d.)</u> Date	
Contractor:	Facility/Bldgs:		
	cilities operate underground coal mines or under development with an operational sification system? (40 CFR 98 Subpart FF - not reportable until 2011)	Yes	□ No
Do any of your fact (40 CFR 98 Subpar	cilities operate zinc smelters or secondary zinc recycling facilities? t GG)	Yes	☐ No
and landfill gas de	cilities operate municipal solid waste landfills (includes landfill gas collection systems estruction devices)? (40 CFR 98 Subpart HH) ardous waste, construction and demolition, or industrial landfills)	Yes	□No
following operation	cilities operate industrial wastewater treatment systems (only applicable at the ons - pulp and paper manufacturing, food processing, ethanol production, or g)? (40 CFR 98 Subpart II - not reportable until 2011)	Yes	□ No
Do any of your fac	cilities operate manure management systems? (40 CFR 98 Subpart JJ)	Yes	□ No
Do any of your fac	cilities produce, import, or export coal-based liquid fuels? (40 CFR 98 Subpart LL)	Yes	□ No
Do any of your fac (40 CFR 98 Subpar	cilities produce, import, export, or supply petroleum products? t MM)	Yes	□No
	cilities operate as natural gas liquids fractionators or local natural gas distribution FR 98 Subpart NN)	Yes	□ No
	cilities produce a fluorinated greenhouse gas or nitrous oxide, import fluorinated s or nitrous oxide in bulk, or export fluorinated greenhouse gases or nitrous oxide 8 Subpart OO)	Yes	□No
stream for purpos of a CO_2 stream ir of CO_2 ? (40 CFR 96 (storage of CO_2 above distribution of CO_2 ; pu	cilities contain production process units or production wells that capture a CO_2 less of supplying CO_2 for commercial applications or capture and maintain custody no roder to sequester or otherwise inject it underground? Bulk importer or exporter $B \cdot Subpart PP$) a ground or in geologic formations; use of CO_2 in enhanced oil an gas recovery; transportation or unification, compression, or processing of CO_2 ; on-site use of CO_2 captured on site; and CO_2 imported tent are excluded from reporting requirements)	Yes	□ No
Do any of your factor equal to 300,00 (dedicated construction dust, rocks and/or soll bricks, mortar, cement	cilities operate industrial landfills with a total landfill design capacity greater than 00 metric tons? (40 CFR 98 Subpart TT - not reportable until 2011) on and demolition waste landfills industrial landfills that only receive inert wastes (fly ash, cement kiln from excavation and construction activities, glass, non-chemically bound sand, clay, gypsum, pottery cull, furnace slag, refractory materials, plastics, and other waste materials that have a volatile solids reight percent (on a dry basis) or less) are excluded from reporting requirements)	Yes	□No
Comments:			

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eenhouse Gas Monitoring	an - Source Applicability Determination Checklist (contd.) Date
Contractor:	Facility/Bldgs:
I certify that, based or in accordance with	asonable inquiry, the information provided in this submittal has been prepared applicable requirements and is to the best of my knowledge and belief, true, accurate, and complete.
Print Name:	
Signature	Date
Signature	
	Submit by E-mail

Note: The following subparts are [reserved] and will be incorporated into this checklist once they are finalized in 40 CFR 98:
Subpart B, Subpart I, Subpart L, Subpart M, Subpart W, Subpart DD, Subpart KK, Subpart QQ, Subpart RR, and Subpart SS.

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Click here to access form for completion

Appendix B

Example Certification Sheet

INSERT Facility Name

2010 Annual GHG Emissions Reporting for the Reporting Period January 01, 2010 through December 31, 2010

I certify that, based on reasonable inquiry, the information provided in this submittal has been prepared in accordance with all applicable requirements and is to the best of my knowledge and belief, true, accurate, and complete.

Program / Project Director:	(INSERT Typed Name)	Date:
Or		
Program / Project Manager:	(INSERT Typed Name)	Date:

Greenhouse Gas Monitoring Plan - Source Applicability Determination Checklist	Date:	
Contractor: Facility/Bldgs:		
Do any of your facilities operate non-electric stationary combustion sources? (40 CFR 98 Subpart C) (portable and emergency equipment are exempt from reporting requirements)	☐ Yes	□ No
If yes, mark fuel types used: Diesel Gasoline Propane	☐ Natural Gas	Biomass
If other, please list:		
If yes, mark equipment types used: Generator Boiler Water/ Space Heate	r 🗌 Furnace	☐ Incinerator
If other, please list:		
Do any of your facilities operate electricity generation units subject to the requirements of the Acid Rain Program or required to monitor and report CO ₂ emissions year round? (40 CFR 98 Subpart D (portable and emergency equipment are exempt from reporting requirements)	☐ Yes	□ No
Do any of your facilities produce adipic acid using oxidation? (40 CFR 98 Subpart E)	Yes	☐ No
Do any of your facilities manufacture primary aluminum? (40 CFR 98 Subpart F) (does not include experimental cells or research and development process units)	☐ Yes	□ No
Do any of your facilities operate ammonia manufacturing process units? (40 CFR 98 Subpart G)	☐ Yes	☐ No
Do any of your facilities manufacture portland cement? (40 CFR 98 Subpart H)	Yes	☐ No
Do any of your facilities produce ferroalloys (ferrochromium, ferromanganese, ferromolybdenum, ferronickel, ferrosilicon, ferrotitanium, ferrotungsten, ferrovanadium, silicomanganese, or silicon meta (40 CFR 98 Subpart K)	al)?	□ No
Do any of your facilities manufacture flat glass, container glass, pressed or blown glass, or wool fiberglass? (40 CFR 98 Subpart N) (does not include experimental furnaces or research and development process units)	☐ Yes	□ No
Do any of your facilities produce HCFC-22 and/or destruct HFC-23? (40 CFR 98 Subpart O)	Yes	□ No
Do any of your facilities produce hydrogen gas sold as a product to other entities? (40 CFR 98 Subpart	P)	☐ No
Do any of your facilities produce iron and steel? (40 CFR 98 Subpart Q)	☐ Yes	☐ No
Do any of your facilities operate as primary or secondary lead smelters? (40 CFR 98 Subpart R)	Yes	☐ No
Do any of your facilities manufacture lime products (e.g. calcium oxide, high-calcium quicklime, calcium hydroxide, hydrated lime, dolomitic quicklime, dolomitic hydrate)? (40 CFR 98 Subpart S)	☐ Yes	□ No
Do any of your facilities produce magnesium or use molten magnesium in alloying, casting, drawing extruding, forming, or rolling operations? (40 CFR 98 Subpart T - not reportable until 2011)	☐ Yes	□ No
Do any of your facilities operate equipment that uses carbonates (limestone, magnesite, dolomite, siderite, ankerite, rhodochrosite, or sodium carbonate/soda ash)? (40 CFR 98 Subpart U)	Yes	□ No
Do any of your facilities produce nitric acid? (40 CFR 98 Subpart V)	☐ Yes	□ No
Do any of your facilities produce petrochemicals (i.e. include processes that produce acrylonitrile, carbon black, ethylene, ethylene dichloride, ethylene oxide, or methanol)? (40 CFR 98 Subpart X)	Yes	□ No
Do any of your facilities operate as a petroleum refinery? (40 CFR 98 Subpart Y)	☐ Yes	□ No
Do any of your facilities operate a wet-process phosphoric acid production line? (40 CFR 98 Subpart Z		□ No
Do any of your facilities manufacture pulp and paper? (40 CFR 98 Subpart AA)	Yes	□ No
Do any of your facilities produce silicon carbide for abrasive purposes? (40 CFR 98 Subpart BB)	Yes	□ No
Do any of your facilities manufacture soda ash? (40 CFR 98 Subpart CC)	Yes	No No
Do any of your facilities produce titanium dioxide? (40 CFR 98 Subpart EE)	☐ Yes	□No

Greenhouse Gas Monit	toring Plan - Source Applicability Determination Checklist (conto	<u>d.)</u> Date:	
Contractor:	Facility/Bldgs:		
Do any of your facilities ope pre-mining degasification s	erate underground coal mines or under development with an operational ystem? (40 CFR 98 Subpart FF - not reportable until 2011)	☐ Yes	☐ No
Do any of your facilities ope (40 CFR 98 Subpart GG)	erate zinc smelters or secondary zinc recycling facilities?	Yes	□ No
and landfill gas destruction	erate municipal solid waste landfills (includes landfill gas collection systems devices)? (40 CFR 98 Subpart HH) e, construction and demolition, or industrial landfills)	Yes	□ No
following operations - pulp	erate industrial wastewater treatment systems (only applicable at the and paper manufacturing, food processing, ethanol production, or R 98 Subpart II - not reportable until 2011)	☐ Yes	□ No
Do any of your facilities ope	erate manure management systems? (40 CFR 98 Subpart JJ)	Yes	☐ No
	oduce, import, or export coal-based liquid fuels? (40 CFR 98 Subpart LL)	☐ Yes	☐ No
	oduce, import, export, or supply petroleum products?	☐ Yes	□No
`	erate as natural gas liquids fractionators or local natural gas distribution	☐ Yes	☐ No
Do any of your facilities pro	oduce a fluorinated greenhouse gas or nitrous oxide, import fluorinated us oxide in bulk, or export fluorinated greenhouse gases or nitrous oxide	☐ Yes	□ No
Do any of your facilities cor	ntain production process units or production wells that capture a CO ₂		
stream for purposes of sup	plying CO ₂ for commercial applications or capture and maintain custody		
	sequester or otherwise inject it underground? Bulk importer or exporter		
of CO ₂ ? (40 CFR 98 Subpart			
(storage of CO ₂ above ground or distribution of CO ₂ ; purification, of	in geologic formations; use of CO ₂ in enhanced oil an gas recovery; transportation or compression, or processing of CO ₂ ; on-site use of CO ₂ captured on site; and CO ₂ imported		
	luded from reporting requirements)	Yes	□ No
or equal to 300,000 metric (dedicated construction and dem dust, rocks and/or soil from excav bricks, mortar, cement, furnace sl	erate industrial landfills with a total landfill design capacity greater than tons? (40 CFR 98 Subpart TT - not reportable until 2011) solition waste landfills, industrial landfills that only receive inert wastes (fly ash, cement kiln vation and construction activities, glass, non-chemically bound sand, clay, gypsum, pottery cull, ag, refractory materials, plastics, and other waste materials that have a volatile solids		
concentration of 0.5 weight perce	ent (on a dry basis) or less) are excluded from reporting requirements)	☐ Yes	□ No
Comments:			

<u> Greenhouse Gas</u>	Monitoring Plan - Source Applicability Determination Checklist (contd.)	Date:	
Contractor:	Facility/Bldgs:		
I certify the	at, based on reasonable inquiry, the information provided in this submitta dance with all applicable requirements and is to the best of my knowledg	l has bo	een prepared
in accor	accurate, and complete.		Jener, cracy
Print Nan	ne:		
Signatu	re:	Date:	
	Submit by E-mail		

Note: The following subparts are [reserved] and will be incorporated into this checklist once they are finalized in 40 CFR 98:

Subpart B, Subpart I, Subpart L, Subpart M, Subpart W, Subpart DD, Subpart KK, Subpart QQ, Subpart RR, and Subpart SS.