

Department of Defense Clean Air Act (CAA) Services Steering Committee Climate Change: Greenhouse Gases and the CAA



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Overview

- Background on Department of Defense (DoD) Greenhouse Gas (GHG) Reporting
- Role of the DoD Clean Air Act Services Steering Committee
- Current GHG Issues



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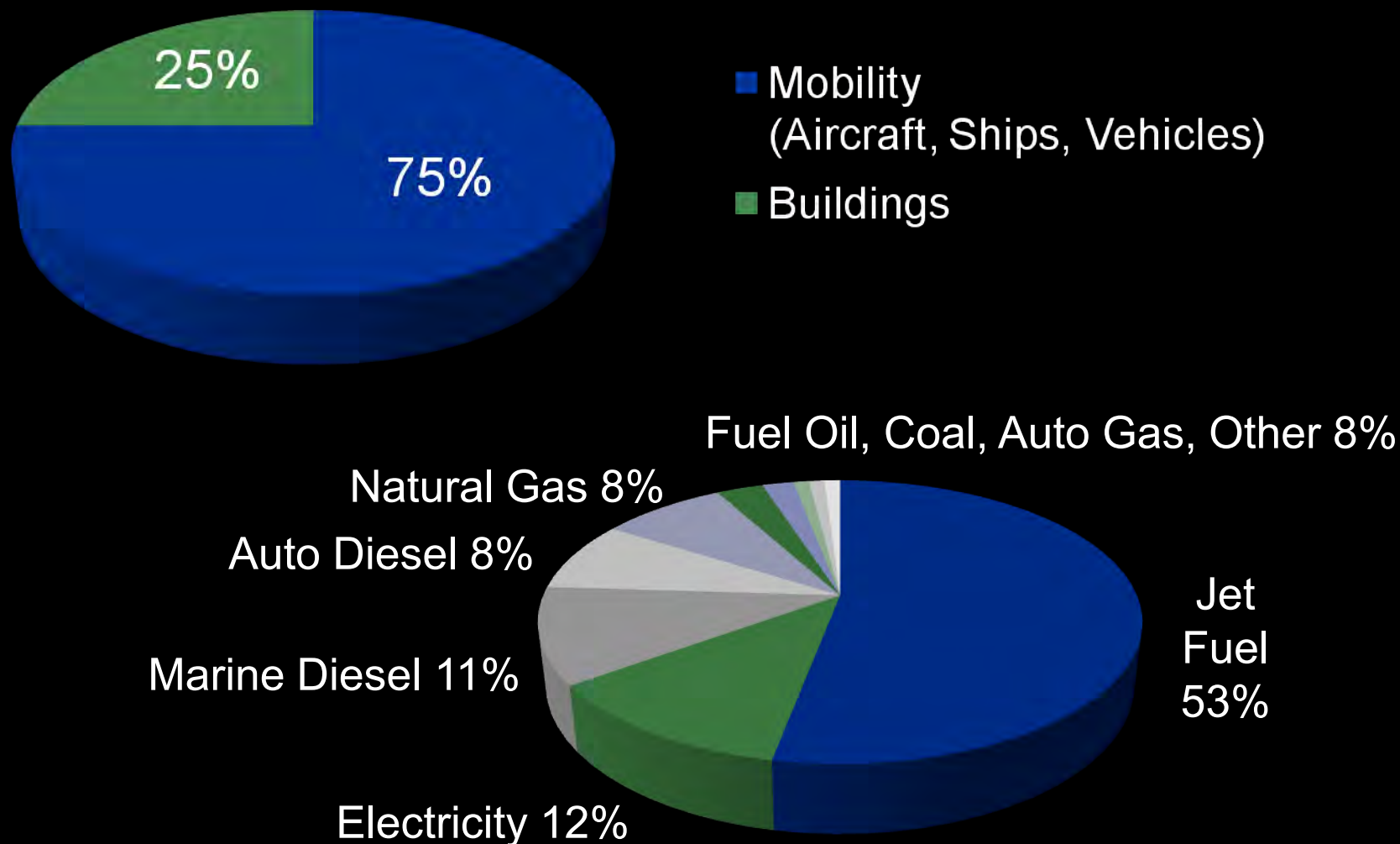


Background on DoD GHG Reporting

- Executive Order 13423 (Jan. 2007) directs Federal Agencies to reduce GHG emissions through reduction of “energy intensity”
- GHGs: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆
- Annually, DoD reports energy/fuel use data to the Department of Energy
- Annually, DoD reports military “bunker fuels” (international ship/aviation fuel use) to the Environmental Protection Agency
- DoD developed a GHG inventory - June 2000
 - For 1990 (base year) and 1996
 - Comprehensive: Included DoD-wide GHG emissions & sinks



DoD Energy Consumption



Source: DoD Annual Energy Management Report (FY 2007)

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DoD Clean Air Act Services Steering Committee

- Purpose: DoD/Joint Services committee established in 1990 to coordinate compliance with the requirements of the Clean Air Act (CAA) across the DoD Components.
- Goals:
 - Develop technical, legal and policy analyses of CAA compliance requirements.
 - Review and comment on CAA implementing regulations.
 - Share information and data on CAA initiatives.
 - Monitor emerging issues and legislation.
 - Propose technical compliance guidance.
 - Develop and recommend policy.
- Thirteen subcommittees work various CAA issue areas.



Timeline: Role of the Climate Change Subcommittee

- Subcommittee has traditionally tracked climate change issues
- Sept. 2006, California Global Warming Solutions Act (AB32)
- April 2007, Supreme Court Decision (Mass. vs. EPA) on GHGs as air pollutants under the CAA
- Dec. 2007, FY2008 Consolidated Appropriations Act directed EPA to publish a mandatory GHG inventory reporting rule under the CAA
- July 2008, in response to the Supreme Court Decision, EPA published an Advanced Notice of Proposed Rulemaking (ANPR) to solicit public input on potential regulation of GHG emissions under the CAA



Timeline (cont'd): Role of the Climate Change Subcommittee

- Feb. 2009, EPA Revisits CA waiver request (vehicle GHG emissions)
- April 2009, EPA Proposed Rule: Mandatory Reporting of GHGs
- April 2009, EPA Finding of Endangerment for GHGs under CAA Sec. 202(a)
- April 2009, EPA Annual U.S. GHG Emissions and Sinks Inventory
- April 2009, EPA Analysis of Waxman-Markey Discussion Draft: The American Clean Energy and Security Act of 2009
- April 2009, President's Earth Day Message
Central Theme: Climate Change



DoD Response to EPA GHG Rulemaking:

EPA ANPR on Regulation of GHGs under the CAA; DoD Response:

- Retain national security protections/exemptions for engines and fuels for tactical vehicles, equipment and weapon systems (aircraft, vessels)
- Allow use of certain GHGs in mission-critical applications
- Seriously evaluate impact of General Conformity requirements
- Retain equitable treatment of stationary sources at military installations IAW EPA's guidance (1996)

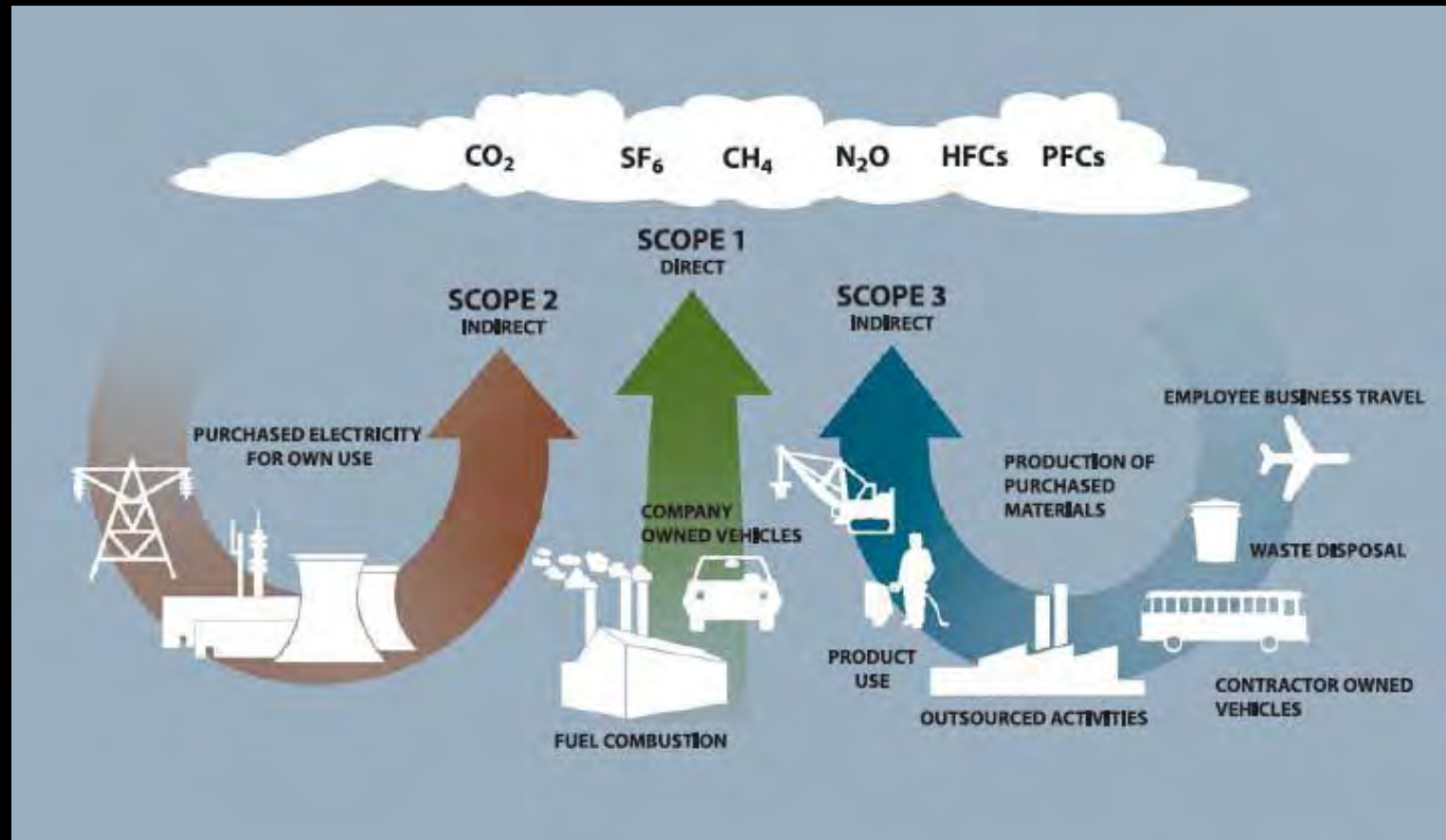
EPA Proposed Rule: Mandatory Reporting of GHGs

- DoD assessing potential DoD implications
- Conducting a preliminary assessment for DoD installations to estimate which DoD facilities may be subject to reporting requirements



Example of GHG Emissions Inventory Protocol

- Scope 1: Direct Emissions (boilers, vehicles, etc.)
- Scope 2: Indirect Emissions (electric, steam use, etc.)
- Scope 3: (*Optional*) Indirect Emissions (contractor mobile, business travel, employee commuting, etc.)



Source: WRI/WBCSD, *The Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard, Revised Edition, Chapter 4*

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EPA Proposed Rule: Mandatory Reporting of GHGs

Purpose: Collect data to better inform future policy decisions.

Who Reports? -- Applicability and Scope

- (Suppliers of fossil fuels or industrial GHGs, vehicle/engine manufacturers, and facilities exceeding applicable threshold)

Thresholds – Hybrid of Capacity-based and Emissions-based

- In general, facilities that emit 25k mtCO₂e or more GHG per year.

Reporting Methodology

- Hybrid of direct emissions measurement and facility-specific calculations

Frequency and Verification

- Annual; Reporter self-certifies; EPA verifies via QA/QC and enforces

For more info:

- <http://www.epa.gov/climatechange/emissionsghgrulemaking.html>



Current GHG Issues

1. EPA Rulemaking on GHGs under the authority of the CAA, CAASSC leads DoD coordination
2. Compliance with applicable requirements for mandatory GHG reporting under State regulatory programs
3. Supporting OSD in developing a uniform protocol for GHG reporting
4. Addressing GHGs and assessing potential Global Climate Change impacts under the National Environmental Policy Act (NEPA)