

Frequently Asked Questions
Regarding Mandatory Greenhouse Gas Emissions Reporting
For Major Sources
Under Parts 73 (20.2.73 NMAC) and 87 (20.2.87 NMAC)

What are Greenhouse Gases (GHG)?

For purposes of mandatory reporting to the New Mexico Environment Department, greenhouse gases (GHG) include the following compounds: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride.

What is Part 73 and which major sources are subject to it?

Part 73 is the New Mexico air quality regulation that has historically included requirements for reporting emissions of criteria pollutants. Emissions reports are due annually for major sources. As of January 1, 2008, this regulation will also include requirements for reporting of emissions of greenhouse gases (GHG). Major sources that report greenhouse gases under Part 87 are not required to report GHG under Part 73.

What is Part 87 and which major sources are subject to it?

Part 87 is a new air quality regulation, effective January 1, 2008. It puts in place specific requirements for reporting GHG emissions from electrical generating units (greater than or equal to 25 MW), petroleum refineries and cement manufacturing facilities. Other major sources may choose to report GHG emissions under Part 87 rather than Part 73.

Where can I get copies of the regulations and guidance documents?

Parts 73 and 87 will be posted by December 3, 2007 at
http://www.nmenv.state.nm.us/aqb/ghg/ghgrr_index.html

What GHG emissions will need to be reported for which reporting years?

For all major sources subject to Part 73 or Part 87:

- Emissions of CO₂ from the facility must be reported annually, beginning with emissions occurring in 2008
- Emissions of methane from the facility must be reported annually, beginning with emissions occurring in 2009
- Emissions of nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride from the facility must be reported annually, beginning with emissions occurring in 2010.

In addition, for sources subject to Part 87:

- Emissions of GHG that occur at another location as a result of the production of electricity, steam and heat purchased and consumed at the facility must be reported annually, beginning with emission occurring in 2009.

How do I calculate emissions of GHG?

The Department will release GHG Reporting Procedures in draft form by October 31 and final form by December 31 of the year prior to the emissions year. The draft reporting procedures for emissions occurring in 2008 are available at http://www.nmenv.state.nm.us/aqb/ghg/ghgrr_index.html.

What about de minimis emissions?

The GHG Reporting Procedures will include provisions for provide for simplified and limited documentation of emissions that are expected to be minimal relative to the facility's total GHG emissions.

What about GHG emissions from motor vehicles?

GHG emissions from motor vehicles at the facility are not required to be reported under Parts 73 or 87.

How and when do I report emissions of GHG under Part 73?

GHG emissions should be included in the facility's criteria pollutant emission inventory submittal, on the submittal date for that report in the Operating Permit.

How and when do I report emissions of GHG under Part 87?

GHG emissions may be included in the facility's criteria pollutant emission inventory submittal, on the submittal date for that report in the Operating Permit. Alternatively, GHG emissions may be reported by using the web-based GHG reporting tool being developed by the Department. This tool will be available before the end of 2008.

What if I register my GHG emissions under The Climate Registry or the California Climate Action Registry?

The GHG emissions inventory submittal requirements of Parts 73 and 87 may be met by making available to the Department the data that is required under those regulations and reported under The Climate Registry or the California Climate Action Registry.