
Greenhouse Gas Reporting Program (GHGRP) Subparts LL & MM

Registration Guidance Document



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Compliance and Innovative Strategies Division
Office of Transportation and Air Quality
U.S. Environmental Protection Agency

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In response to the FY2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110–161), EPA has issued the Greenhouse Gas Reporting Program (GHGRP) under 40 CFR Part 98, which requires reporting of greenhouse gas (GHG) emissions from large sources and suppliers in the United States. Under Part 98, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions are required to submit annual reports to EPA. Part 98 was published in the Federal Register (www.regulations.gov) on October 30, 2009 under Docket ID No. EPA-HQ-OAR-2008-0508-2278 and became effective December 29, 2009.

Subpart LL consists of producers, importers, and exporters of products listed in Table MM–1 of Subpart MM that are coal-based (coal-to-liquid products). A producer of coal-to-liquid products is any owner or operator who converts coal into liquid products (e.g., gasoline, diesel) using the Fischer-Tropsch or an alternative process. Suppliers of coal-to-liquid products that meet the applicability criteria in the General Provisions (40 CFR 98.2) must report GHG emissions.

Subpart MM consists of petroleum refineries and importers and exporters of petroleum products and natural gas liquids as listed in Table MM–1 of Subpart MM. A petroleum refinery for the purpose of Subpart MM is any facility engaged in producing petroleum products through the distillation of crude oil.

This guidance document is intended to assist parties regulated under the GHGRP Subparts LL & MM register with Central Data Exchange (CDX) under OTAQReg. This document should be used in conjunction with the appropriate GHGRP registration web page (<http://www.epa.gov/otaq/regs/fuels/fuelsregistration.htm>) and the CDX User Guide (<http://www.epa.gov/otaq/regs/fuels/420b10022.pdf>).

For questions regarding the rule (40 CFR Part 98) or where you should register, please email GHGMRR@epa.gov or see the [Greenhouse Gas Reporting Program](#) web page.

For questions regarding registration in CDX with the OTAQReg program, please email EPAFuelsPrograms@epa.gov.

Companies may be required to register for BOTH e-GGRT and OTAQReg. You will only need one user name and password per user; this will log you in to both registration and reporting systems.

The rest of this document will support registration for the three types of users under Subparts LL & MM:

- [First Time User](#)
 - This user does NOT have an e-GGRT log-in.
 - This user does NOT have an existing CDX log-in.
 - This company is NOT registered with another [Part 80 program](#)
- [New User with Existing Company/Facility](#)
 - This user does NOT have an e-GGRT log-in.
 - This user does NOT have an existing CDX log-in.
 - This company IS registered with another [Part 80 program](#)
- [Existing User](#)
 - This user has EITHER an e-GGRT log-in OR existing CDX log-in.
 - This company may be registered with another [Part 80 program](#)

Also included are templates for all supplemental documents required for registration. Please note all registration paperwork must be mailed to EPA in order to complete the registration process.

- Appendix A: Digital Signature Agreement (DR/ADR)
- Appendix B: CDX Submitter Delegation Letter (DR/ADR)
- Appendix C: Certificate of Representation (DR/ADR)
- Appendix D: DR/ADR/Agent Company Authorization Form
- Appendix E: DR/ADR/Agent Facility Authorization Form

Mail completed forms to:

US Mail:

U.S. Environmental Protection Agency
Fuels Programs Registration (6406J)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Commercial Delivery:

U.S. Environmental Protection Agency
Fuels Programs Registration
Room 647C; 202-343-9038
1310 L Street, NW
Washington, DC 20005

First Time User

These instructions should be used in conjunction with the **First Time User instructions** provided on the [Fuels Programs Registration](#) page.

- This user does NOT have an e-GGRT log-in.
- This user does NOT have an existing CDX log-in.
- This company is NOT registered with another [Part 80 program](#)

Supplemental Instructions:

- Step 5** Disregard bullet indicating “Office of Transportation and Air Quality EPA Moderated Transaction System (OTAQEMTS)”
- Step 9** The following are definitions for the initial user roles (clarified for GHGRP):
- Submitter: Can submit reports on behalf of the company/facility, select if DR/ADR/Agent
 - Company Editor: Can edit and create registrations for the company
 - Company Viewer: Can view company information, but not edit
 - Nominator: not applicable
- Step 11** Select Program Type and Business Activity:
- Program Type: Diesel
 - Business Activities: Refiner and/or Non Renewable Fuels Importer
 - Please select Non Renewable Fuels Importer if your company has the importer or exporter role per §98.6
- Please note, these categories are temporary; the system is in the process of an update to include appropriate GHGRP selections. Select these categories even if you are not diesel/refiner.
- Step 12** Facility registration (in OTAQReg) is required for Refiners only.
For new refiners that are registering a facility for the first time please select the following when filling out facility details:
- Facility Type: Diesel/Biodiesel
 - Facility Activities: Refiner and Other (indicate GHGRP in the text field)
- Please note, these categories are temporary; the system is in the process of an update to include appropriate GHGRP selections. Select these categories even if you are not diesel/refiner.

Company/facilities must be activated in CDX by EPA in order for additional users (DR/ADR/Agents) to associate with that company. Initial company registration should be completed by the DR who then will submit a complete registration package. Once the company/facilities are activated by EPA, the ADR and Agent(s) can associate.

Registration Package:

1. Create CDX and OTAQReg account, create new company and facilities (if applicable)
2. CDX registration report
3. Digital Signature Agreement (Appx. A)
4. CDX Submitter Delegation Letter (Appx. B)
5. Certificate of Representation (Appx. C)
6. DR/ADR/Agent Company Authorization Form (Appx. D), 1 per company
7. DR/ADR/Agent Facility Authorization Form, if applicable (Appx. E), 1 per facility

All facilities, if applicable, can be registered in Step 1.

Please note all registration paperwork must be mailed to EPA in order to complete the registration process.

New User with Existing Company

These instructions should be used in conjunction with the **New User with Existing Company** instructions provided on the [Fuels Programs Registration](#) page.

- This user does NOT have an e-GGRT log-in.
- This user does NOT have an existing CDX log-in.
- This company IS registered with another [Part 80 program](#)

Supplemental Instructions:

Step 12 The following are definitions for the initial user roles (clarified for GHGRP):

- Submitter: Can submit reports on behalf of the company/facility, select if DR/ADR/Agent
- Company Editor: Can edit and create registrations for the company
- Company Viewer: Can view company information, but not edit
- Nominator: not applicable

Associating with a company for the first time will also associate you with all of its registered facilities (if applicable). You may not edit any part of the company and/or facility information until you have submitted the appropriate paperwork and it has been activated by EPA.

Registration Package:

1. Create CDX and OTAQReg, associate with existing company (this will associate user with all facilities as well)
2. CDX registration report
3. Digital Signature Agreement (Appx. A)
4. CDX Submitter Delegation Letter (Appx. B)
5. Certificate of Representation (Appx. C)
6. DR/ADR/Agent Company Authorization Form (Appx. D), 1 per company
7. DR/ADR/Agent Facility Authorization Form, if applicable (Appx. E), 1 per facility

If there are any facilities that are not currently registered, they can only be added after this information is submitted to EPA. Steps 5-7 should reflect all facilities that are required to comply with Subparts LL and/or MM, even if they are not fully registered in CDX/OTAQReg.

Please note all registration paperwork must be mailed to EPA in order to complete the registration process.

Existing Users

These instructions should be used in conjunction with the Existing Users instructions provided on the [Fuels Programs Registration](#) page.

- This user has EITHER an e-GGRT log-in OR existing CDX log-in.
- This company IS registered with another [Part 80 program](#)

Supplemental Instructions:

Step 9

The following are definitions for the initial user roles (clarified for GHGRP):

- Submitter: Can submit reports on behalf of the company/facility, select if DR/ADR/Agent
- Company Editor: Can edit and create registrations for the company
- Company Viewer: Can view company information, but not edit
- Nominator: not applicable

Step 10

Please verify that the following selections have been made:

- Company Information
 - Program Type: Diesel
 - Business Activities: Refiner and/or Non Renewable Fuels Importer
 - Please select Non Renewable Fuels Importer if your company has the importer or exporter role per §98.6
- Facility registration (in OTAQReg) is required for Refiners only. For new refiners that are registering a facility for the first time please select the following when filling out facility details:
 - Facility Type: Diesel/Biodiesel
 - Facility Activities: Refiner and Other (indicate GHGRP in the text field)

Please note, these categories are temporary; the system is in the process of an update to include appropriate GHGRP selections. Select these categories even if you are not diesel/refiner.

Registration Package:

1. If Company Editor, update and company and facility information as needed (in CDX/OTAQReg)
2. CDX registration report, if updates were made in CDX
3. Digital Signature Agreement (Appx. A), if not already submitted
4. CDX Submitter Delegation Letter (Appx. B)
5. Certificate of Representation (Appx. C)
6. DR/ADR/Agent Company Authorization Form (Appx. D), 1 per company
7. DR/ADR/Agent Facility Authorization Form, if applicable (Appx. E), 1 per facility

If there are any facilities that are not currently registered, they can be added in Step 1, if user is a company editor. Steps 5-7 should reflect all facilities that are required to comply with Subparts LL and/or MM, even if they are not fully registered in CDX/OTAQReg.

Please note all registration paperwork must be mailed to EPA in order to complete the registration process.

A complete registration package for a company and associated facilities (if applicable) will contain the following:

1. CDX New Registration Report (for new associations only)
 - a. Required for EACH DR/ADR/Agent, that is new to OTAQReg
2. Digital Signature Agreement (Appx. A)
 - a. Required for EACH DR/ADR that will submit reports
 - i. if user does not currently have one in place for OTAQReg
 - b. EACH signed by the appropriate DR/ADR
3. CDX Submitter Delegation Letter (Appx. B)
 - a. Required for EACH DR/ADR
 - b. Signed by the RCO
 - c. Can have one letter that lists ALL DR/ADR for one company and associated facilities
4. Certificate of Representation (COR) (Appx. C)
 - a. Required for EACH DR/ADR
 - b. Required for EACH facility, if DR/ADR is for multiple facilities, one COR is required for EACH
 - c. EACH initialed and signed by appropriate DR/ADR
5. DR/ADR/Agent Company Authorization Form (Appx. D)
 - a. 1 template per company
 - b. No signature required
6. DR/ADR/Agent Facility Authorization Form, if applicable (Appx. E)
 - a. 1 template per facility
 - b. No signature required

Appendix A: Digital Signature Agreement

For users that will submit reports electronically on behalf of their company/facility.

In accepting the electronic signature issued by the United States Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), on behalf of:

(Company Name)

Address: _____

City/State/Zip Code: _____

Facility Name: _____

I, _____

(Name of the electronic signature holder)

- (1) Agree to protect the signature from use by anyone except me, and to confirm system security with third parties where necessary. Specifically, I agree to maintain the secrecy of the code where the signature is based on a secret code;
- (2) Understand that the Immediate Supervisor or Witnessing Official who signs below will be contacted by the US EPA and asked to validate my employment at the Corporation Name listed above;
- (3) Understand and agree that I will be held as legally bound, obligated, or responsible by my use of my electronic signature as I would be using my hand-written signature, and that legal action can be taken against me based on my use of my electronic signature in submitting an electronic document to the US EPA's CDX;
- (4) Agree never to delegate the use of my electronic signature or make my signature available for use by anyone else;
- (5) Understand that whenever I electronically sign and submit an electronic document to the US EPA's CDX, acknowledgments and a copy of my submissions will be made available to me;
- (6) Agree to review the acknowledgments and copies of documents I electronically sign and submit to the US EPA's CDX;
- (7) Agree to report to the US EPA, within twenty-four hours of discovery, any evidence of the loss, theft, or other compromise of any component of my electronic signature;
- (8) Agree to report to the US EPA, within twenty-four hours of discovery, any evidence of discrepancy between an electronic document I have signed and submitted and what the US EPA's CDX has received from me;
- (9) Agree to notify the US EPA if I cease to represent the regulated entity specified above as signatory of that organization's electronic submissions to the US EPA's CDX, as soon as this change in relationship occurs and to sign a surrender certification at that time.

(EPA Program ID(s), e.g. Dun and Bradstreet Number)

(Print Name)

(Signature of electronic signature holder)

(Date)

(Official Title)

Appendix B: CDX Submitter Delegation Letter

**Required if DR/ADR is not the Responsible Corporate Officer. Printed on company letterhead.
Please use THIS template, NOT the template that prints from CDX.**

This is required even if user(s) have this in place for other Part 80 or part 79 programs.

To Whom it May Concern:

Please be advised that I <<Responsible Corporate Officer Full Name>>, <<Title>>, delegate <<Delegate Full Name>>, <<Title>> to submit any and all information to the United States Environmental Protection Agency in relation to Greenhouse Gas Reporting Rule, Subparts LL and/or MM.

I acknowledge that the delegated person may appoint an Agent to submit on <<his/her>> behalf.

I authorize delegate <<Delegate Full Name>> to set up a CDX account and apply for and obtain a digital certificate enabling <<him/her>> to electronically sign and certify reports submitted to the EPA, on my behalf. <<Delegate Full Name>> understands the reports and information <<He/She>> is submitting.

In addition, I acknowledge that I and the delegated person are responsible for the information submitted in accordance with 40 CFR 98, Subparts LL and/or MM.

Signed,

<<Wet ink Signature>>

<<Responsible Corporate Officer Full Name>>, <<Title>>,

Date:<<MM/DD/YYYY>>

Appendix C: Certificate of Representation

Required for EACH DR/ADR for EACH company and/or facility. Printed on company letterhead.

DR/ADR information:

1. Name of DR/ADR:
2. Address:
3. E-mail address:
4. Fax:
5. Name of company/facility (1 COR EACH):
6. List of owners/operators as required under 40 CFR 98.4(i)(3):

“I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the facility or supplier, as applicable.”

Initials DR/ADR: _____

“I certify that I have all the necessary authority to carry out my duties and responsibilities under 40 CFR part 98 on behalf of the owners and operators of the facility or supplier, as applicable, and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.”

Initials DR/ADR: _____

“I certify that the owners and operators of the facility or supplier, as applicable, shall be bound by any order issued to me by the Administrator or a court regarding the facility or supplier.”

Initials DR/ADR: _____

“If there are multiple owners and operators of the facility or supplier, as applicable, I certify that I have given a written notice of my selection as the ‘designated representative’ or ‘alternate designated representative’, as applicable, and of the agreement by which I was selected to each owner and operator of the facility or supplier.”

Initials DR/ADR: _____

DR/ADR Signature:

Date:

Appendix D: DR/ADR/Agent Company Authorization Form

Required for each company. Printed on company letterhead.

Ultimate Parent Company (highest-level and largest % owner per 98.3(c)(11))	
Company Name:	
EPA 4-digit ID:	
NAICS Code(s):	
Street Address (no PO Boxes):	
City:	
State:	
Zip/Postal Code:	
Owner or Operator(s):	
Responsible Corporate Officer:	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	
Designated Representative (DR):	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	
Alternate DR (ADR):	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	
Agent (repeat as necessary):	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	

Appendix E: DR/ADR/Agent Facility Authorization Form

Required for each facility under Subparts LL & MM. Printed on company letterhead.

Facility Name:	
EPA 5-digit ID(s):	
Facility Registry System (FRS)#:	
Street Address (no PO Boxes):	
City:	
State:	
Zip/Postal Code:	
Owner or Operator(s):	
Designated Representative (DR):	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	
Alternate DR (ADR):	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	
Agent (repeat as necessary):	
First Name:	
Last Name:	
Phone:	
E-mail:	
re-type E-mail:	
Fax:	